

Appendix 4

Visual Impact Assessment

**S16 PLANNING APPLICATION
APPROVED MID-LEVELS WEST OUTLINE ZONING PLAN NO. S/H11/15**

**Proposed Minor Relaxation of Building Height Restriction
for a Permitted Residential Development
in “Residential (Group B)” and “Residential (Group C) 4” Zones
at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels**

VISUAL IMPACT ASSESSMENT

June 2026

Applicant:

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Consultancy Team:

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PLANNING LIMITED
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Table of Contents

1 INTRODUCTION

- 1.1 Purpose
- 1.2 Report Structure

2 METHODOLOGY

- 2.1 Visual Impact Assessment Approach

3 BASELINE REVIEW

- 3.1 Site Location and Existing Condition
- 3.2 Existing Visual Elements in the Surrounding Context
- 3.3 Planning Context

4 PROPOSED DEVELOPMENT SCHEME

- 4.1 The Development Scheme
- 4.2 Design Merits
- 4.3 Access Arrangement and Internal Transportation Provision

5 IDENTIFICATION OF SENSITIVE VIEWERS AND SELECTION OF VIEWPOINTS

- 5.1 Identifying Visual Envelope and Sensitive Viewers
- 5.2 Selection of Viewpoints

6 ASSESSMENT OF VISUAL IMPACTS

- 6.1 General
- 6.2 VP1 – Bonham Road Rest Garden
- 6.3 VP2 – West End Park
- 6.4 VP3 – Kotewall Road Rest Garden
- 6.5 VP4 – Lugard Road Lookout
- 6.6 VP5 – Sun Yat Sen Memorial Park
- 6.7 VP6 – Strategic View Point in West Kowloon Cultural District

7 CONCLUSION AND SUMMARY

List of Figures

Figure 1.1	Site Location Plan
Figure 3.1	Key Visual Elements
Figure 3.2	Zoning Context Plan
Figure 4.1	Proposed Setback for Streetscape Improvement
Figure 5.1	Visual Envelope and Location of Viewpoints
Figure 6.1	Viewpoint 1 - Bonham Road Rest Garden
Figure 6.2	Viewpoint 2 - West End Park
Figure 6.3	Viewpoint 3 - Kotewall Road Rest Garden
Figure 6.4	Viewpoint 4 - Lugard Road Lookout
Figure 6.5	Viewpoint 5 - Sun Yat Sen Memorial Park
Figure 6.6	Viewpoint 6 - West Kowloon District (Strategic Viewpoint)

List of Tables

Table 4.1	Technical Schedule
Table 4.2	Proposed Floor Use of Tower 1
Table 4.3	Proposed Floor Use of Tower 2
Table 4.4	Internal Transport Facilities Provision
Table 5.1	Selected Visually Sensitive Viewpoints
Table 5.2	Identified Visually Sensitive Viewpoints with Preliminary Analysis
Table 7.1	Visual Impact Assessment Summary

S16 PLANNING APPLICATION
Approved Mid-Levels West OZP No. S/H11/15

**Proposed Minor Relaxation of Building Height Restriction
for a Permitted Residential Development
in “Residential (Group B)” and “Residential (Group C) 4” Zones
at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels**

Visual Impact Assessment

1 INTRODUCTION

1.1 Purpose

- 1.1.1 This Visual Impact Assessment (“VIA”) report is prepared on behalf of Gainlong Limited and Honour Future Limited (“the Applicants”) in support of a S16 Planning Application for the Proposed Minor Relaxation of Building Height Restriction for a Permitted Residential Development (“Proposed Development”) at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels (“Application Site”/the “Site”) (**Figure 1.1** refers). The Site falls within areas zoned “Residential (Group B)” (“R(B)”) and “Residential (Group C) 4” (“R(C)4”) on the Approved Mid-levels West Outline Zoning Plan No. S/H11/15 (“Approved OZP”).
- 1.1.2 This VIA evaluates, in accordance with the Town Planning Board (“TPB”) Guidelines No. 41A – Guidelines on Submissions of Visual Impact Assessment for Planning Applications to the Town Planning Board (“TPB PG-No. 41A”), the anticipated visual impact of the Proposed Development on public viewers relevant to the Site and concludes with recommendation on mitigation measures if necessary.

1.2 Report Structure

Following this Introductory Section, the methodology adopted in this assessment will be set out in Section 2. The baseline review of the assessment area is included in Section 3. Section 4 includes the Indicative Development Scheme and discussion on the design considerations. Visual envelope, Visually Sensitive Receivers (VSRs) and their representative viewpoints will be identified and analysed in Section 5, followed by assessment of the visual impacts, if any in Section 6. Section 7 concludes this VIA.

Proposed Minor Relaxation of Building Height Restriction for a Permitted Residential Development
in "Residential (Group B)" and "Residential (Group C) 4" Zones
at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels
S16 Planning Application

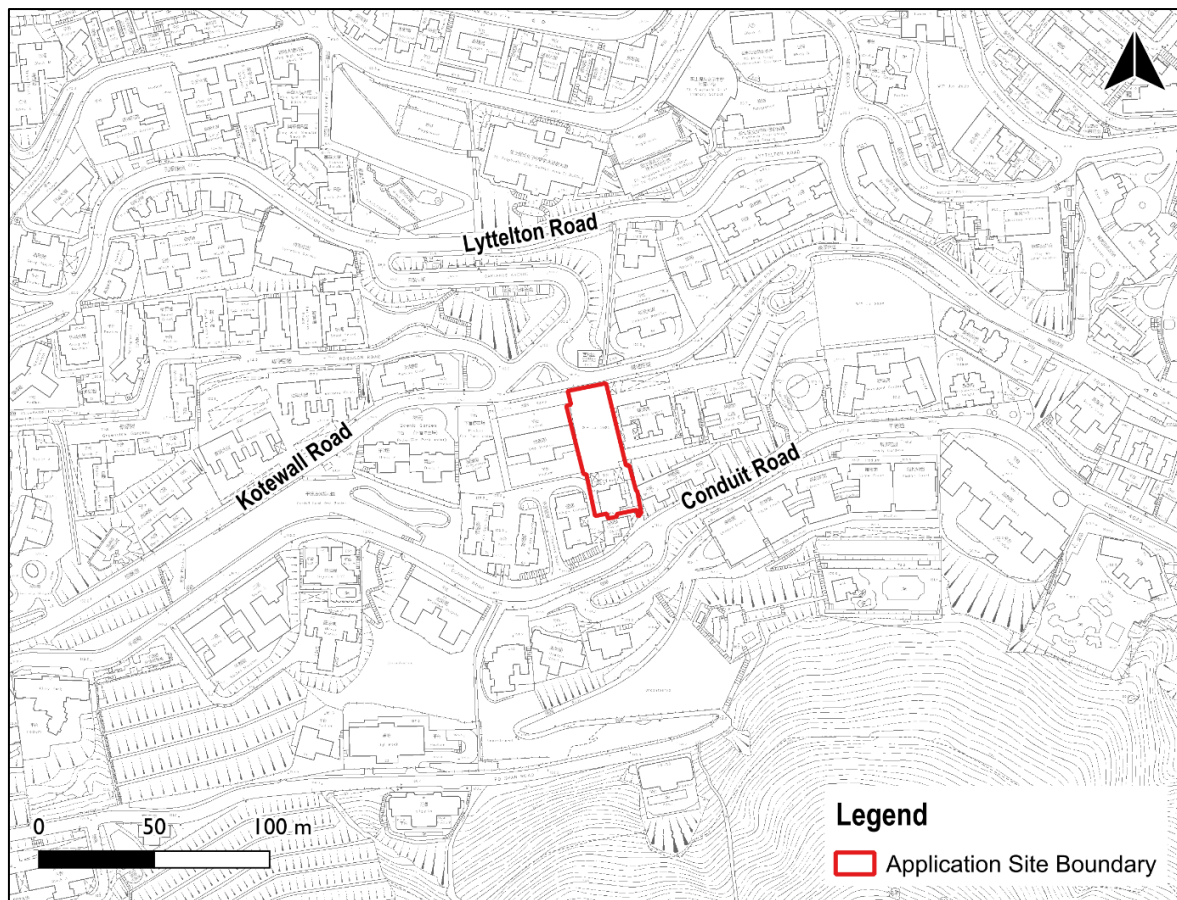


Figure 1.1 Site Location Plan

2 METHODOLOGY

2.1 Visual Impact Assessment Approach

- 2.1.1 This VIA aims at evaluating the potential visual impact of the Proposed Development with the minor relaxation of building height restriction for a permitted residential development by assessing the visual impact of Proposed Development on public viewers / sensitive viewers as compared with the existing and OZP conforming conditions.
- 2.1.2 According to TPB PG-No. 41A, the overall visual impact shall be assessed based on i) the sensitivity of the key public viewers; ii) 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. Visual Impacts could be either beneficial or adverse.
- 2.1.3 Visual sensitivity of public viewers / sensitive viewers is determined taking into account the activity of the sensitive viewers, the duration and distance over which the Proposed Development would remain visible, and the public perception of the value attached to the view being assessed. Visual sensitivity is qualitatively graded from high, medium or low.
- 2.1.4 Visual changes 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** and loss of views to key public viewing points; and
 - the effects of **Visual Changes** from key public viewing points with direct sightlines to the Proposed Development.
- 2.1.5 The magnitude of visual changes will be qualitatively graded as Substantial, Moderate, Slight or Negligible.
- 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 surroundings and the planning context of the Site.
 - The Indicative Development Scheme for the Site will be briefly presented.
 - The Visual Envelope ("VE") will be determined based on the size and distance of the Proposed Development and appropriate public viewpoints ("VPs") to

represent the view from public viewers will be identified.

- Each VP and potential visual impacts of the Indicative Development Scheme on the public viewers will be analysed based on the photomontages prepared from the selected VPs.
- The overall visual impact will be assessed based on the five levels of significance.

3 BASELINE REVIEW

3.1 Site Location and Existing Condition

- 3.1.1 The Application Site, with an area of about 1,674.6m², is located at 1 & 1A Kotewall Road and 64 Conduit Road at the Mid-levels. Sandwiched between Kotewall Road in the north and Conduit Road in the south. The building at Kotewall Road level (at +109.98mPD) had already been demolished, while the existing building at Conduit Road level (at +141.52mPD) is currently unoccupied.
- 3.1.2 Having said that the southern portion of the Site fronts onto Conduit Road, the existing formation level ties with the adjoining building (i.e. King's Garden) at about +132.6mPD).

3.2 Existing Visual Elements in the Surrounding Context

- 3.2.1 The visual outlook of the area is shaped by a combined composition of all the visual elements which come into sight of the viewers. Surrounded by a mountain backdrop, the Site is embedded within clusters and clusters of medium-to-high-rise residential developments in a high-density setting.
- 3.2.2 Key visual elements in the surrounding context of the Site including those with positive visual qualities (i.e. "visual attractors") and those with negative visual qualities (i.e. "visual detractors") are summarised below:

Positive Visual Elements (Visual Attractors):

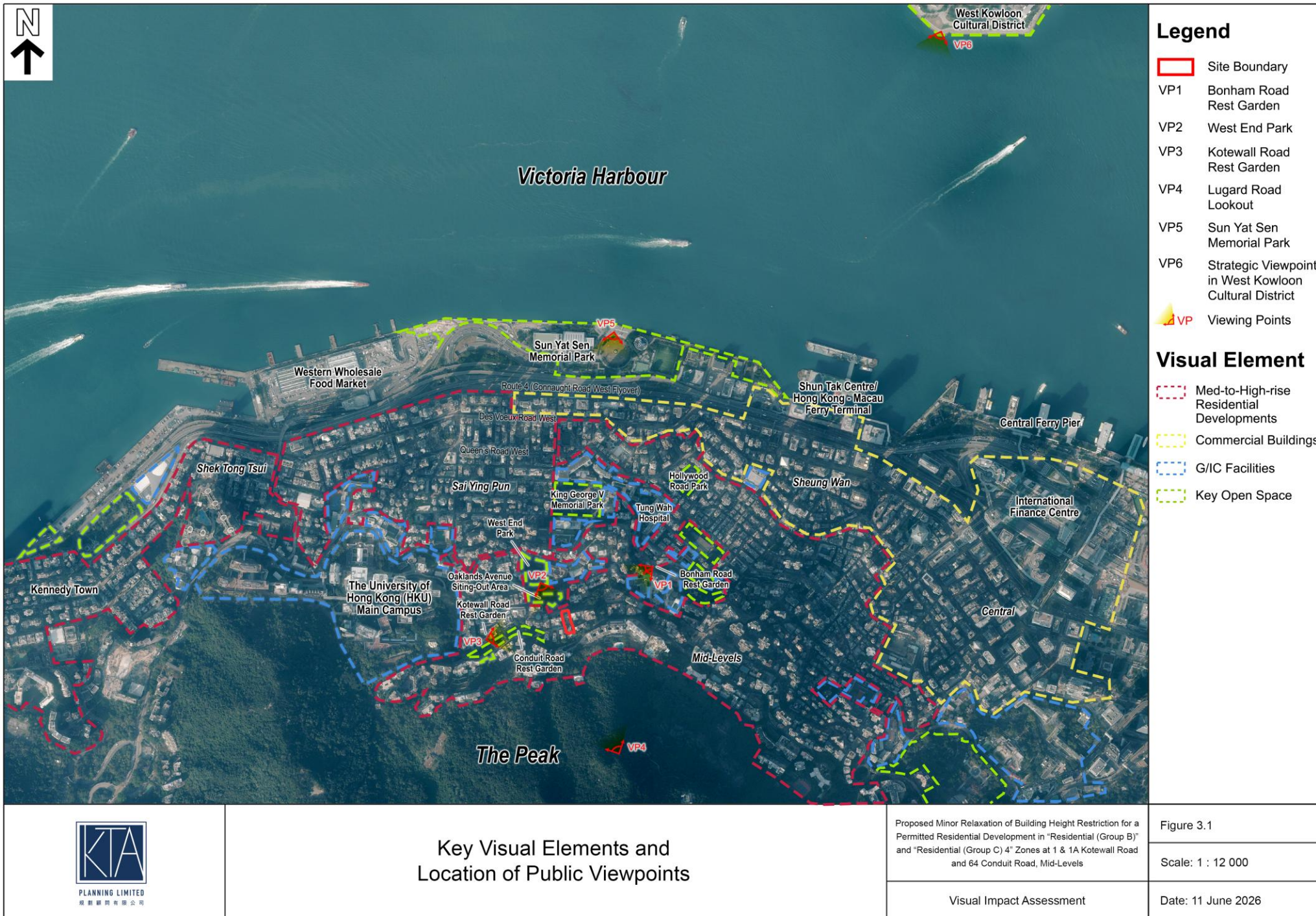
- To the north is the Victoria Harbour, which is a key natural visual resource in the Kowloon Peninsula that offers visual openness and waterfront view along the coastline of northern Hong Kong Island and southern Kowloon Peninsula.
- To the south of the Site is The Peak (about +550mPD). Its mountain ridgeline forms a natural landscape element and backdrop for the Site. There is public aspiration in protecting views towards The Peak.
- Lush vegetation along Conduit Road and Kotewall Road contributes to a green character for the area.
- There are a number of open recreational spaces in the area including Conduit Road Rest Garden, Oaklands Avenue Sitting-out Area, West End Park, Conduit Road Children's Playground and Kotewall Road Rest Garden which offer some visual openness to the area.
- The varied building height profile of surrounding medium- to high-rise residential developments, together with the stepped topography of the Mid-Levels, creates a visually interesting townscape that integrates with the natural hillside setting.

Negative Visual Elements (Visual Detractors):

- To the north of the Site is dense clusters of medium- to high-rise residential developments in the immediate surroundings, including Imperial Court (about +272.4mPD), Villa Veneto (about +222.1mPD) and Dragonview Court (about

+231.1mPD). Such area with high-density urban fabric may result in visual enclosure and reduced permeability in certain localised views.

- Tall retaining walls along parts of Kotewall Road and Conduit Road may negatively affect the oppressiveness and visual appeal in the streetscape at ground level.
- A number of high-rise commercial developments in Central and Sheung Wan area, including No. 118 Connaught Road West (about +139.6mPD), Cosco Tower (about +204.9mPD) and China Merchants Tower (about +151.2mPD) are located to the north and northeast of the Site. The high-rise commercial developments may affect the visual openness of the area and create visual obstruction to the viewers in the surrounding area.



3.3 Planning Context

Statutory Planning Context

- 3.3.1 The Application Site falls within an area zoned “Residential (Group B)” and “Residential (Group C) 4” on Approved Mid-Levels West Outline Zoning Plan No. S/H11/15 (**Figure 3.2** refers). According to the Statutory Notes of the Approved OZP, planning intention of the “R(B)” zone is “*primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board*”. For “R(C)4” zone, the intention is “*primarily for low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.*”

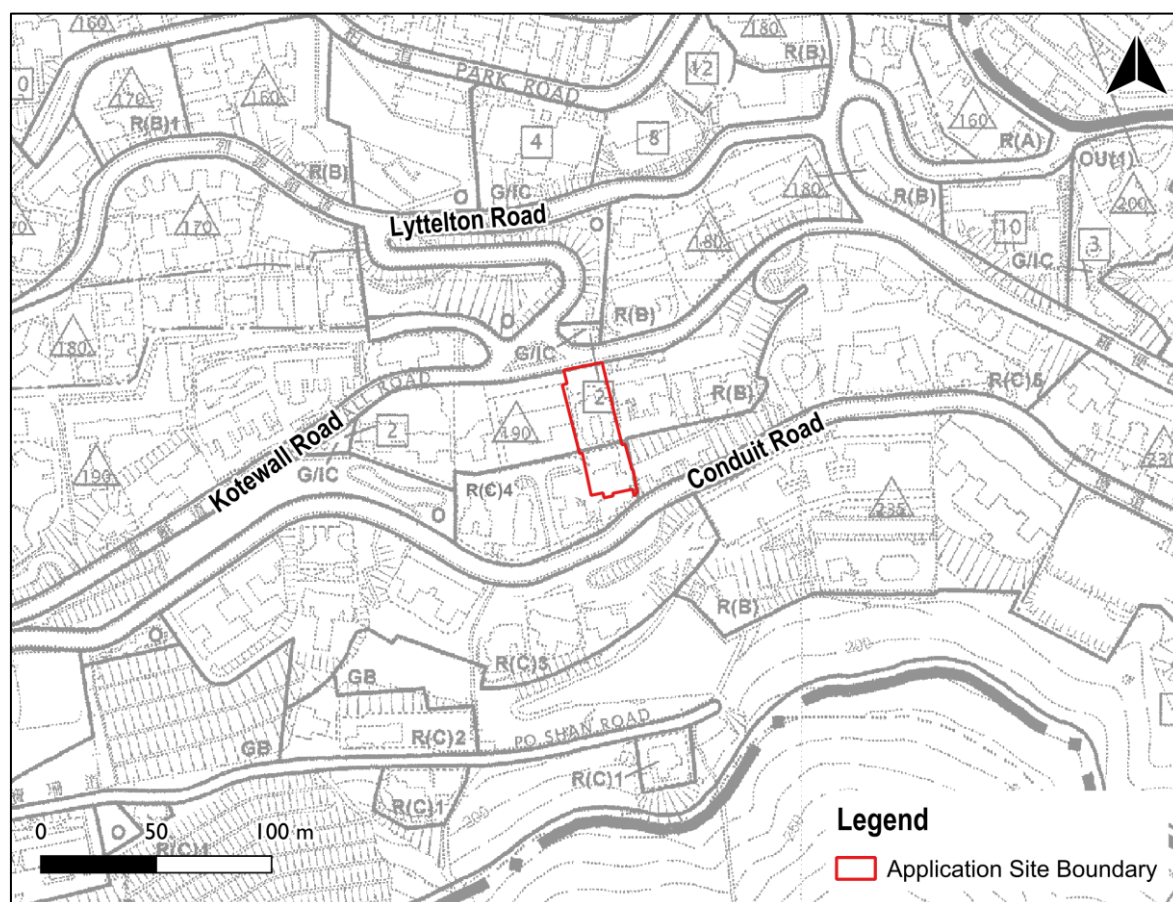


Figure 3.2 Zoning Context Plan

- 3.3.2 Under the “Remarks” section of the Statutory Notes attached to the Approved OZP, the northern portion of the Site, which is zoned “R(B)”, is subject to plot ratio and building height restrictions of 5 and 190mPD respectively. Meanwhile, the southern portion of the Site, which is zoned “R(C)4”, is subject to building height restrictions of 156mPD. It is also stated that based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio, GFA and building height restrictions may be considered by the Town Planning Board on application

under section 16 of the Town Planning Ordinance.

- 3.3.3 According to the Statutory Notes of the Approved OZP, the proposed ‘Flat’ use is a Column 1 Use that is always permitted under the subject “R(B)” and “R(C)4” zones.

Non-Statutory Planning Context

- 3.3.4 As stated in the Explanatory Statement (“ES”) of the Approved OZP, in order to prevent excessively tall or out-of-context buildings, to preserve the existing views of the ridgeline and Victoria Harbour and to provide better control on the building heights of developments in the Area, building height restrictions are imposed for the “C”, “R(A)”, “R(B)”, “R(C)6”, “R(C)8”, “G/IC” and “OU” zones on the Plan. The stepped building height concept recommended in the Urban Design Guidelines with lower buildings along the lower altitude and near major district open spaces has been adopted, taking into account the local area context, the local wind environment, and the need to maintain visually compatible building masses in the wider setting. In view of the topography of the Area, there are 27 height bands ranging from 115mPD to 320mPD for the “C”, “R(A)”, “R(B)”, “R(C)6” zones – generally increasing progressively from Caine Road/Bonham Road, Kennedy Road and uphill. The proposed building height bands help preserve views to the ridgelines, achieve a stepped height profile, and maintain visual permeability and wind penetration and circulation as far as possible.
- 3.3.5 Moreover, a minor relaxation clause in respect of building height restrictions is incorporated into the Notes of the Plan in order to provide incentive for developments/redevelopments with design merits/planning gains. Each planning application will be considered on its own merits and the relevant criteria for consideration of such application are as follows:
- (a) amalgamating smaller sites for achieving better urban design and local area improvements;
 - (b) accommodating the bonus plot ratio granted under the Buildings Ordinance in relation to surrender/dedication of land/area for use as a public passage/street widening;
 - (c) providing better streetscape/good quality street level public urban space;
 - (d) providing separation between buildings to enhance air and visual permeability; and
 - (e) other factors such as site constraints, need for tree preservation, innovative building design and planning merits that would bring about improvements to townscape and amenity of the locality and would not cause adverse landscape and visual impacts.

4 PROPOSED DEVELOPMENT SCHEME

4.1 The Development Scheme

- 4.1.1 Schematic drawings for the Proposed Residential Development are presented in **Appendix I** of this Supporting Planning Statement. The Application Site, with a total area of approximately 1,674.6m², yields a total GFA of approximately 8,373m² based on a plot ratio of 5. A total of 46 residential units with an average flat size of about 182m² would be provided under the Proposed Residential Development.
- 4.1.2 The Proposed Residential Development comprises two residential blocks. The taller northern block ("**Tower 1**"), fronts onto Kotewall Road at a lower ground level (approximately +109.98 mPD), would have a total of 31 floors (+225.5mPD). Within this Tower 1, loading and unloading spaces are located on LG2/F, covered car-parking spaces are provided on LG1/F and G/F, and open-air car-parking spaces together with clubhouse facilities are situated on 1/F. Residential units are proposed from 2/F and onwards. The lower southern block ("**Tower 2**"), fronts onto Conduit Road at a higher ground level (approximately +141.52mPD), would have a total of 3 floors with a maximum roof height of not more than +144.56mPD. In Tower 2, sheltered car-parking spaces and lift lobby are provided on the ground floor, while residential units are located on the first and second floors. The estimated population of the Proposed Residential Development is about 304 and the completion year would be 2030. **Tables 4.1** to **4.3** below summarise the key development parameters and proposed floor uses.
- 4.1.3 In order to address the substantial level difference between the two blocks and to ensure convenient and barrier-free movement for residents throughout the development, a dedicated passenger lift is proposed along the retaining structure. The lift will directly connect the first floor of Tower 1 with the ground floor of Tower 2.

Table 4.1 Technical Schedule

	Proposed Development Scheme
Total Site Area	About 1,674.6m ²
Domestic Plot Ratio	5
Domestic GFA	8,373m ²
No. of Unit	46
Average Flat Size	182m ²
Building Height* (main roof level)	
• Tower 1	Not more than +225.5mPD
• Tower 2	Not more than +144.56mPD
No. of Storeys	
• Tower 1	31
• Tower 2	3
Site Coverage	Not more than 33.3%
No. of Block	2
Private Open Space	Not less than 1m ² per person

* According to Join Practice Note No.5, the maximum building height at top roof would be 230.5mPD (the height of roof-top structure should be equal to or less than 10% of the building height or 15m).

Table 4.2 Proposed Floor Use of Tower 1

Floor	Proposed Use
LG2/F	Lift Lobby, E&M and Loading/Unloading Space
LG1/F to G/F	E&M and Covered Car Parking Spaces
1/F	Clubhouse, E&M and Open-air Car Parking Spaces
2/F to 32/F (4/F, 13/F, 14/F and 24/F omitted)	Residential Units
R/F	Flat Roof

Table 4.3 Proposed Floor Use of Tower 2

Floor	Proposed Use
G/F	Lift Lobby, E&M and Parking Spaces
1/F to 2/F	Residential Units
R/F	Flat Roof

4.2 Design Merits

- 4.2.1 The Proposed Residential Development has been thoughtfully designed to respond to the unique site constraints, topography and surrounding urban context in the Mid-Levels West area. The design adopts a sensitive, context-responsive approach that balances development potential with significant planning gains in urban design, environmental quality, and pedestrian amenity.

Sensible Building Height

- 4.2.2 The rearrangement of building height design would reduce the overall visual bulk when viewing from Conduit Road and provides generous building separation (approximately 35 metres between the two blocks internally), and improved setbacks to adjacent developments. *Tower 2* would bring an 11.44m reduction compared to the maximum permissible height under the OZP-compliant scheme, substantially enhancing visual and air permeability for neighbouring residents at Peace Court, Imperial Court, and King’s Garden.

Setback for Streetscape Improvement

- 4.2.3 A 5-metre building setback is proposed along the Kotewall Road frontage, which is currently dominated by tall retaining walls and blank facades. This setback not only mitigates the oppressiveness of the existing streetscape but also allows for meaningful greening, landscaping, and high-quality public realm enhancements at street level.



Figure 4.1 Proposed Setback for Streetscape Improvement

- 4.2.4 Provision of Sheltered Minibus Station**
- A key design feature of the Proposed Residential Development is the provision of a new shelter near the bus/minibus stop at the Conduit Road level. This will replace the existing open-air minibus stop, offering passengers protection from adverse weather conditions while waiting for public transport. The sheltered facility will be integrated into the ground floor of *Tower 2*, with convenient access for residents and the general public. This improvement significantly enhances passenger comfort, promotes greater use of public transport, and contributes to a more user-friendly and inclusive street environment along Conduit Road.

4.3 Access Arrangement and Internal Transportation Provision

- 4.3.1 For the access arrangement of the *Tower 1*, generally all vehicles will enter via 1 & 1A Kotewall Road and leave via Villa Veneto, except for vehicles using the accessible car parking space and LGV loading / unloading bays on LG2/F. These vehicles will share the same entrance but leave via 1 & 1A Kotewall Road instead of Villa Veneto. For the access arrangement of *Tower 2*, all vehicles will enter and leave via right-of-way shared with Peace Court, King's Garden, Wah Sen Court and Kiu Sen Court, and is connected to Conduit Road. The total internal transport facilities provision is shown in Table 3.2 below.

Table 4.4 Internal Transport Facilities Provision

Types of Facilities	Proposed Provision
Car Parking Spaces	
• Tower 1	31 nos.
• Tower 2	10 nos.
Total	41 nos.*
Motorcycle Parking Spaces	
• Tower 1	1 no.
Total	1 no.
Loading/Unloading Bays for Goods Vehicle	
• Tower 1	Light Goods Vehicle: 1 no.
Total	1 no.

5 IDENTIFICATION OF SENSITIVE VIEWERS AND SELECTION OF VIEWPOINTS

5.1 Identifying Visual Envelope and Sensitive Viewers

5.1.1 The Visual Envelope ("VE") or the zone of visual influence of the proposed relaxation of BHR is determined by the existing topography and building in the vicinity of the Site. As prescribed in the Town Planning Board Guidelines No. 41A, size of the Potential Redevelopment, the distance of the development and its potential visibility from selected viewing points, and the actual site and surrounding topographical conditions are considered as the key factors on selecting VE.

5.1.2 The VE covers the area where direct sight towards the Proposed Development is presented in **Figure 5.1**. As prescribed in the TPB PG-NO. 41A, the viewers will tend to see the building as part of a group rather than as a single building when the viewing distance equals to three times the height of the building from the Site (i.e. the 3H zone). Therefore, 3H zone could also be used as a reference in determining the assessment area. Since the actual maximum building height of the Proposed Development will be about 115m, the assessment area covers a radial area of about 345m from the façade of the Proposed Development. Since protecting private view is not the duty of the TPB, this VIA focuses primarily on public VSR only and no private VSR, such as residents of private development and users of developments with restricted/exclusive accesses (e.g. school and office, etc.) will not be identified.

5.2 Selection of Viewpoints

5.2.1 Representative VPs within the VE were selected for assessing the visual impact to the sensitive viewers. Selected VPs shall cover public views from easily accessible and popular area from different directions. When selecting VPs, priority shall be given to major public open space, public focal points, open spaces, existing/future pedestrian node, key pedestrian/vehicular corridor, and existing major vistas will be considered as major visual sensitive viewpoints.

5.2.2 In this VIA, a total of six VPs are selected for further assessment on the visual impact of the Proposed Development, which are summarized in **Table 5.1** and shown in **Figure 5.1**. The VPs included both close-up and distant views which cover the views from different directions.

Table 5.1 Selected Visually Sensitive Viewpoints

Viewpoint No.	Description
VP1	Bonham Road Rest Garden
VP2	West End Park
VP3	Kotewall Road Rest Garden
VP4	Lugard Road Lookout
VP5	Sun Yat Sen Memorial Park
VP6	Strategic View Point in West Kowloon Cultural District

VP1 – Bonham Road Rest Garden

- 5.2.3 Bonham Road Rest Garden is located about 310m to the northeast of the Application Site. This public rest garden is situated along Bonham Road, one of the main carriageways in the Mid-levels West area, and is often used by local residents for leisure activities. It offers views towards the surrounding residential developments and slopes. The public viewers of this VP are mainly pedestrians, and local residents engaging in leisure and passive recreational activities. Therefore, the sensitivity of the public viewers at this VP is medium.

VP2 – West End Park

- 5.2.4 West End Park is located about 115m to the northwest of the Application Site, acting as a close-up viewpoint within the Mid-levels residential context. It is in close proximity to Sai Ying Pun MTR Station and easily accessible by nearby residents, offering localized views of the streetscape and built forms. The public viewers of this VP would be local residents, pedestrians, and users of the open space for leisure and recreational activities. The sensitivity of the public viewers at this VP is medium to high.

VP3 – Kotewall Road Rest Garden

- 5.2.5 Kotewall Road Rest Garden is situated close to the Application Site along the same road, serving as a small public amenity space for pedestrians and residents in the immediate vicinity. Located about 245m to the west of the Site, this VP provides street-level perspectives of the local built environment. The public viewers of this VP are mainly local residents, users of the local open space and pedestrians walking along Kotewall Road. The sensitivity of the public viewers at this VP is low to medium.

VP4: Lugard Road Lookout

- 5.2.6 Lugard Road Lookout, located on The Peak at an elevation of about +410mPD at about 405m southeast to the Site, is a popular scenic viewpoint and part of the Hong Kong Trail. It offers panoramic views across Victoria Harbour, the Hong Kong Island urban skyline, Kowloon, and the Mid-levels area. It is frequently visited by local residents, hikers, and tourists for its expansive harbour and city vistas. Therefore, the sensitivity of the public viewers at this VP is high.

VP5: Sun Yat Sen Memorial Park

- 5.2.7 Sun Yat Sen Memorial Park is a major waterfront public park in Sai Ying Pun, providing open views towards the Mid-levels slopes and higher-rise developments on Hong Kong Island. It is used by local residents for recreation and offers direct access to the harbourfront. The public viewers of this VP would be visitors engaging in passive and active recreational activities. The sensitivity of the public viewers at

this VP is high.

VP6: Strategic View Point in West Kowloon Cultural District

- 5.2.8 This long-range strategic view point at about 2.1km to the northeast of the Site in the West Kowloon Cultural District provides a cross-harbour perspective towards Hong Kong Island, including the Mid-levels area. It is a key public location for viewing the overall urban skyline and is frequented by visitors to the cultural facilities and the promenade. The sensitivity of the public viewers at this VP is high.

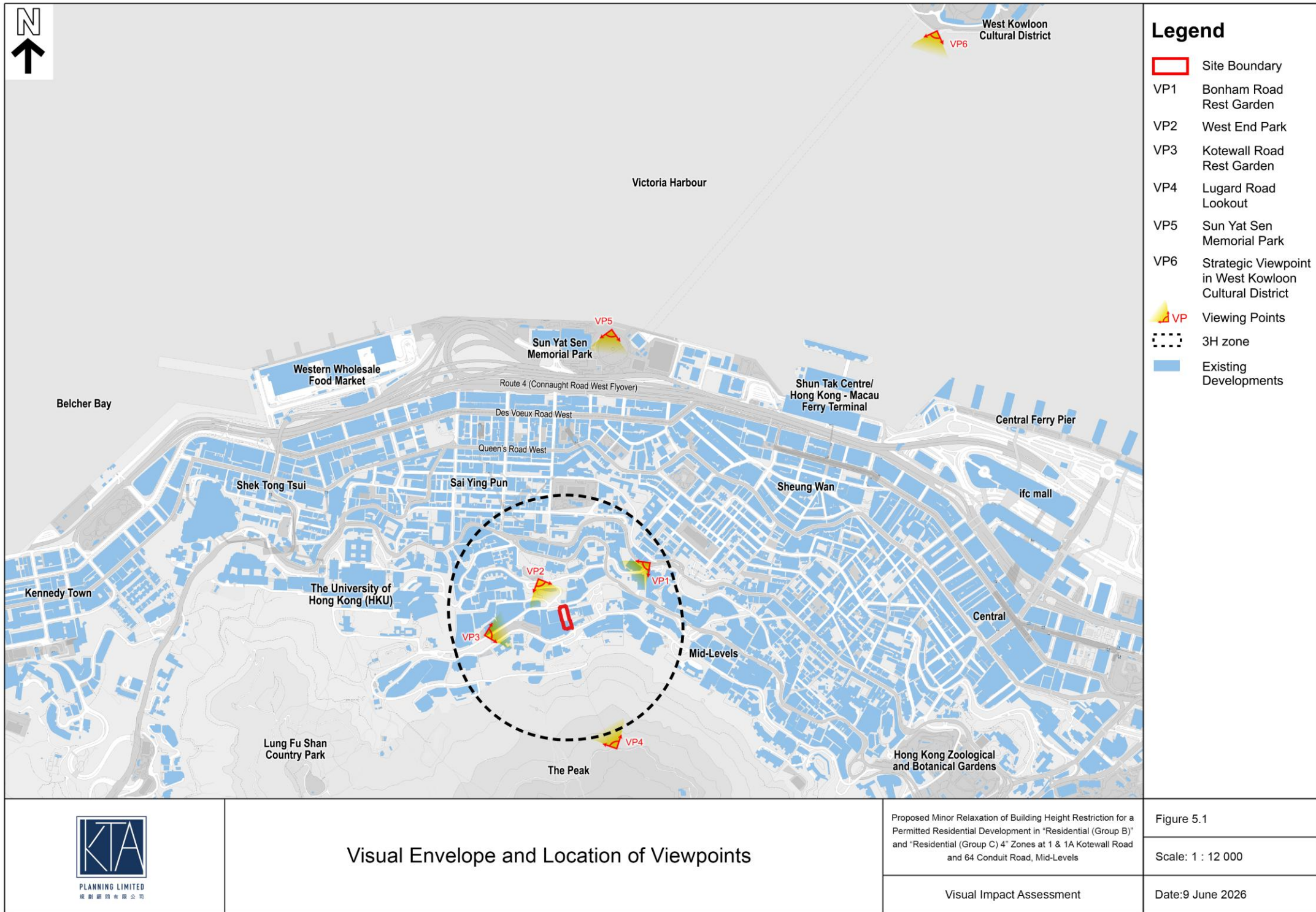


Table 5.2 Identified Visually Sensitive Viewpoints with Preliminary Analysis

Viewpoints (VPs)	Distance/ Direction (Approx.)	Height in mPD (Approx.)	Viewers	Nature of VP	Popularity by Public	Visual Sensitivity
VP1: Bonham Road Rest Garden	310m/ Northeast	+68.0	Pedestrians, local residents, recreational users	Passive Recreation	Occasional	Medium
VP2: West End Park	115m/ Northwest	+86.0	Recreational users	Passive Recreation	Occasional	Medium to High
VP3: Kotewall Road Rest Garden	245m West	+130.0	Local residents, commuters	Transient	Rare	Low to Medium
VP4: Lugard Road Lookout	405m/ Southeast	+410.0	Visitors, hikers, local residents	Passive Recreation/ Transient	Frequent	High
VP5: Sun Yat Sen Memorial Park	880m / North	+4.0	Recreational users, visitors	Passive and Active Recreation/ Transient	Frequent	High
VP6: Strategic View Point in West Kowloon Cultural District	2150m / Northeast	+5.0	Visitors, local residents	Passive Recreation/ Transient	Frequent	High

6 ASSESSMENT OF VISUAL IMPACTS

6.1 General

- 6.1.1 Since the primary objective of this VIA is for evaluating the visual impact of the Proposed Development at the Site. Hence, the assessments in relation to visual composition, visual obstruction, effects on public viewers and effects on visual resources are focused on the changes by the Proposed Development at the Site.

6.2 VP1 – Bonham Road Rest Garden

Visual Composition

- 6.2.1 VP1 is a mid-range viewpoint captures public views toward Ying Wa Girls' School and the junction of Bonham Road and Breezy Path. Prominent high-rise residential buildings frame both sides of the viewpoint and in the foreground, establishing a dense urban fabric that encloses a significant portion of the background open sky. A 3-block residential complex namely Jade Garden is currently being rebuilt. Upon completion, it would completely shield the Proposed Development and the Proposed Development (be it the OZP-Compliant Scheme or the Proposed Development Scheme) would become invisible from this viewpoint. Therefore, the effect of the Proposed Development on visual composition is considered negligible.

Visual Obstruction

- 6.2.2 As shown in **Figure 6.1**, existing buildings such as Bonham Court and the redevelopment of Jade Garden would completely block the view towards the Site amongst the dense Mid-levels West urban environment. Thus, the Proposed Development behind the redevelopment would bring no visual obstruction to the public viewers at this viewpoint.

Visual Change

- 6.2.3 Despite the increase in the maximum BH under the Proposed Development Scheme, compared to the OZP Compliant Scheme, the Proposed Development would still remain visibly lower than the redevelopment of Jade Garden in the foreground. The Proposed Scheme would not introduce noticeable changes to the visual composition and remains compatible with the surrounding built fabric. The main visual elements, including nearby streetscape and open sky, would not be affected. Thus, the magnitude of visual change from this VP is appraised as negligible.

Overall Visual Impact

- 6.2.4 In view of the assessments above, particularly the Proposed Development should be shielded off by the redevelopment of Jade Garden, the Proposed Development would induce no perceptible change to the baseline condition. It is concluded that the overall visual impact at VP1 would be negligible.



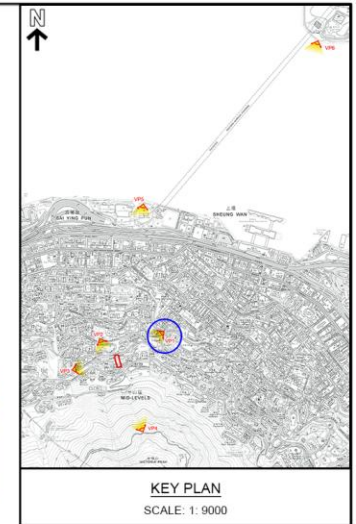
Existing Condition



OZP Compliant Scheme



Proposed Development



6.3 VP2 – West End Park

Visual Composition

- 6.3.1 The visual composition of this short-range VP mainly comprises of the retaining wall of Oaklands Avenue in the foreground; a row of roadside vegetation along Oaklands Avenue in the middle ground, as well as some high-rise Mid-levels residential developments behind and the open sky view as backdrop. The Proposed Development would be visually in between Imperial Court and Villa Veneto and blend in harmoniously with the adjoining residential developments along Kotewall Road and nearby streets in the background. Therefore, the residential nature of the area and overall visual composition in VP2 would remain.

Visual Obstruction

- 6.3.2 The Site is partially vacant and the remaining existing building at the Site has a building height of **5 storeys** only. Any redevelopment at the Site that adheres to the BH Restriction would inevitably obstruct the existing open sky view visually. However, the existing roadside vegetation on Oaklands Avenues would help to ease the potential visual impact. This is because the vegetation would block the views towards half of the Proposed Development Scheme. Having said that, the other half of the proposed building that extrudes over the roadside planting would obstruct views towards the open sky view. Therefore, the impact of visual obstruction to the established VP is slight.

Visual Change

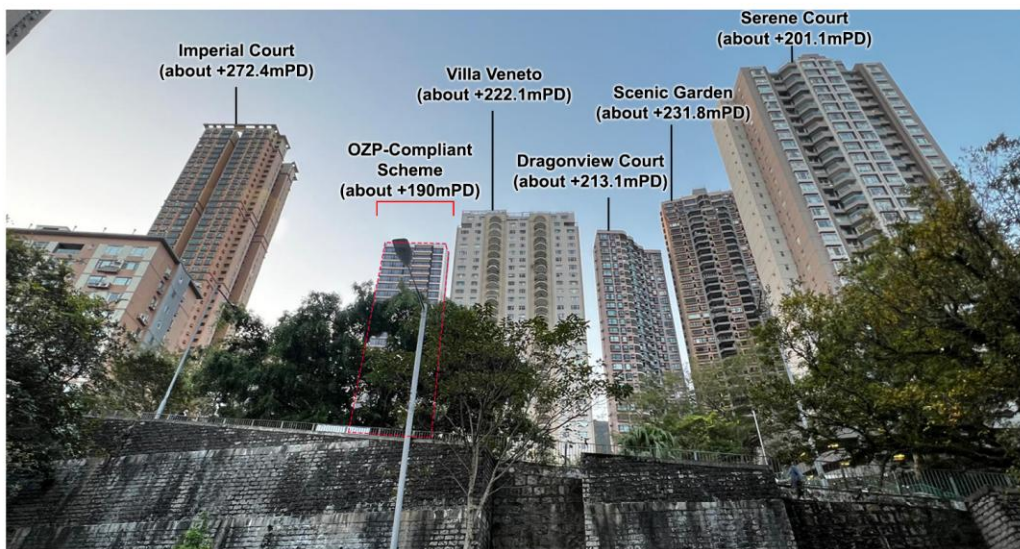
- 6.3.3 As mentioned above, the current redevelopment involves transforming two low-rise residential buildings into a high-rise development. Having visual change would be unavoidable, yet the perceptible visual change would be compatible with the existing high-rise residential area. Notwithstanding, the Proposed Development would also echo with the diverse BH profile. The Proposed Scheme at +225.5mPD continues remains compatible with the surrounding built fabric. Thus, the magnitude of visual change from this VP is appraised as slight.

Overall Visual Impact

- 6.3.4 With reference to **Figure 6.2**, the Proposed Development remains highly compatible with the high-density Mid-levels skyline and is substantially softened by the prominent mature tree canopy in the middle ground, the minor relaxation of building height will only cause slight visual impact compared with the OZP Compliant Scheme. The overall visual impact at VP2 is anticipated to be slight.



Existing Condition



OZP Compliant Scheme



Proposed Development

6.4 VP3 – Kotewall Road Rest Garden

Visual Composition

- 6.4.1 The visual composition of this medium-range VP comprises Kotewall Road in the foreground and dense vegetation (shrubs and tall trees) along the street in the middle ground. Since the Proposed Development is located immediately behind other existing residential development (i.e., Block 2 of Scenic Garden) in the background and they are both partially screened off by the lush green vegetation along Kotewall Road, the effect of Proposed Development on visual composition is considered negligible.

Visual Obstruction

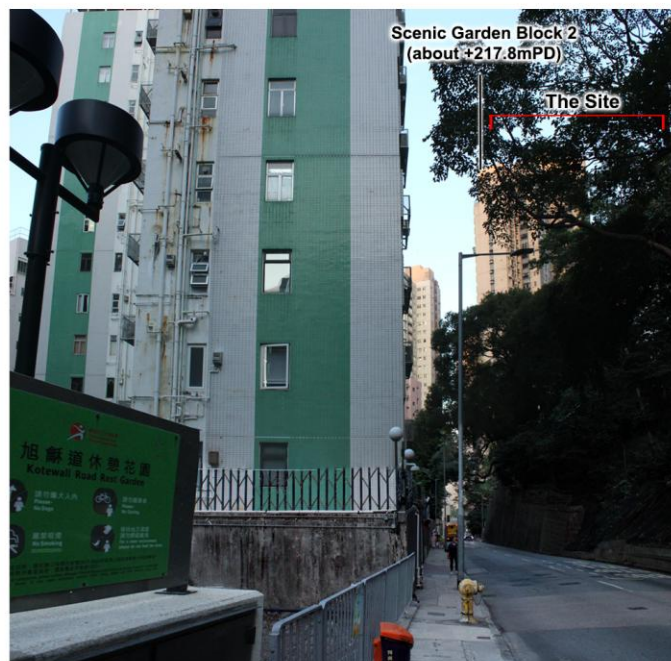
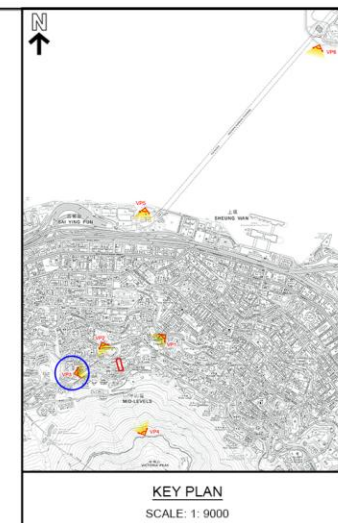
- 6.4.2 As illustrated in **Figure 6.3**, since the Proposed Development is located immediately behind other existing residential development and they are both partially screened off by the existing vegetation along Kotewall Road. The Proposed Development does not encroach upon any visible sky view or green hillside features from this VP. The effect of Proposed Development on visual obstruction of VP3 is considered negligible.

Visual Change

- 6.4.3 Regardless of the increase in BH between the OZP Compliant Scheme and Proposed Scheme, views towards the Proposed Development is currently and will continue to be completely blocked by other existing residential development thus would not be visible from this VP. As such, the visual change from this VP would be negligible.

Overall Visual Impact

- 6.4.4 Having considered that the Proposed Development is fully obscured behind the Scenic Garden, there would be no visual change to be observed from this public space no matter with or without minor relaxation of BH Restriction. Therefore, the overall visual impact at VP3 is concluded to be negligible.



Existing Condition



OZP Compliant Scheme



Proposed Development

6.5 VP4 – Lugard Road Lookout

Visual Composition

- 6.5.1 VP4 is an elevated long-range viewpoint at a strategic location offering a panoramic view which comprises the dense building clusters in Central and Western District in the foreground, Victoria Harbour in the middle ground and existing developments in Kowloon in the background, as well as continuous ridgelines of Tai Mo Shan and open sky view as backdrop. The Proposed Development would seamlessly merge with the adjacent high-rise residential cluster of the Mid-Levels. Therefore, there would be no significant change on the overall wider visual context in VP4. The effect of Proposed Development on visual composition is considered negligible.

Visual Obstruction

- 6.5.2 There is no blockage to the Victoria Harbour corridor, open sky view nor the continuous mountain ridgeline over Kowloon in the backdrop. The Proposed Development might have blocked the view towards West End Park, however this would happen to the OZP Compliant Scheme (+190mPD) as well since the redevelopment involves transforming two low-rise buildings (one being demolished) into a high-rise development. Thus, the effect on visual obstruction is considered slight.

Visual Change

- 6.5.3 As seen from **Figure 6.4**, at this elevated distance at The Peak, the minor increase in BH of the Proposed Scheme would be barely noticeable within the dense building clusters. The Proposed Development would remain visually compatible with the surrounding high-rise residential cluster and would not intrude into the harbour view corridor nor the mountain backdrop. The magnitude of visual change in VP4 is therefore considered slight.

Overall Visual Impact

- 6.5.4 It is concluded that the Proposed Development would be visible from this elevated and popular lookout point. It would be integrated seamlessly into the renowned urban fabric of Hong Kong Island. It would not disrupt any key strategic vistas, resulting in an overall visual impact at VP4 of slight.



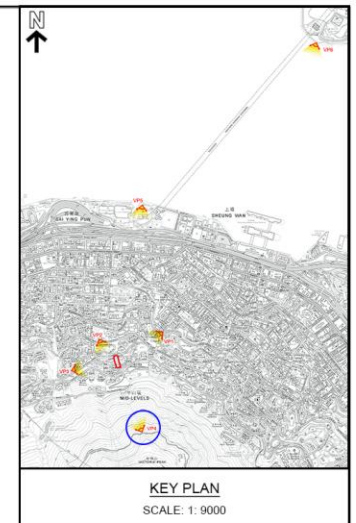
Existing Condition



OZP Compliant Scheme



Proposed Development



6.6 VP5 – Sun Yat Sen Memorial Park

Visual Composition

- 6.6.1 The visual composition of this long-range VP comprises manicured shrubs and trees within Sun Yat Sen Memorial Park in the foreground, existing high-rise and planned development in Sai Ying Pun in the middle ground, building clusters in the background and open sky view as the backdrop. Views towards the Proposed Development would be completely blocked off by the existing townscape (i.e., behind Wilmer Building). Therefore, the magnitude of the visual composition is considered negligible.

Visual Obstruction

- 6.6.2 With reference to **Figure 6.5**, since the Proposed Development would be screened off by existing buildings, the effect on visual obstruction of the Proposed Development is considered negligible.

Visual Change

- 6.6.3 Considering the view is already dominated by existing buildings, the height of the Proposed Development would make no contribution to the visual change; thus, the effect of visual change of the Proposed Development from VP5 is considered negligible.

Overall Visual Impact

- 6.6.4 As the existing high-rise townscape of Sai Ying Pun completely blocks the sightline between this low-level waterfront park and the Proposed Development, it is considered that there would not be any adverse impact from the visual perspective. The overall visual impact at VP5 is appraised as negligible.



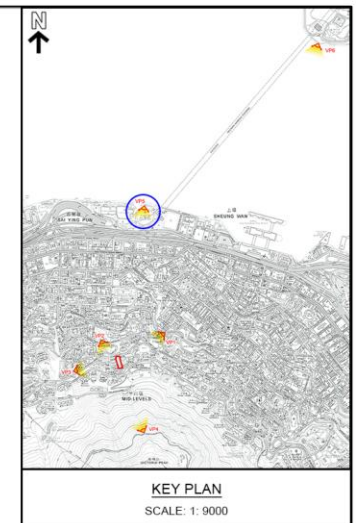
Existing Condition



OZP Compliant Scheme



Proposed Development



KEY PLAN
SCALE: 1: 9000



Viewpoint 5 – Sun Yat Sen Memorial Park

Proposed Minor Relaxation of Building Height
for a Permitted Residential Development
in "Residential (Group B)" and
"Residential (Group C) 4" Zones
at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-levels

Visual Appraisal

Figure 6.5

Date: 9 June 2026

6.7 VP6 – Strategic View Point in West Kowloon Cultural District

Visual Composition

- 6.7.1 The visual composition of this strategic VP in West Kowloon Cultural District consists of a panoramic view of the Hong Kong Island, with Victoria Harbour in the foreground, buildings of diverse BH profile dominating the middle ground, mountain ridgeline of Victoria Peak in the background, as well as open sky view for backdrop. The Proposed Development only forms a tiny part of the group of high-rise building on the Hong Kong Island (not to mention that it is actually located behind some existing developments). It only contributes to a minute portion, if any, in the broader Hong Kong Island urban townscape. Therefore, the magnitude of visual composition of the Proposed Development in this VP is considered negligible.

Visual Obstruction

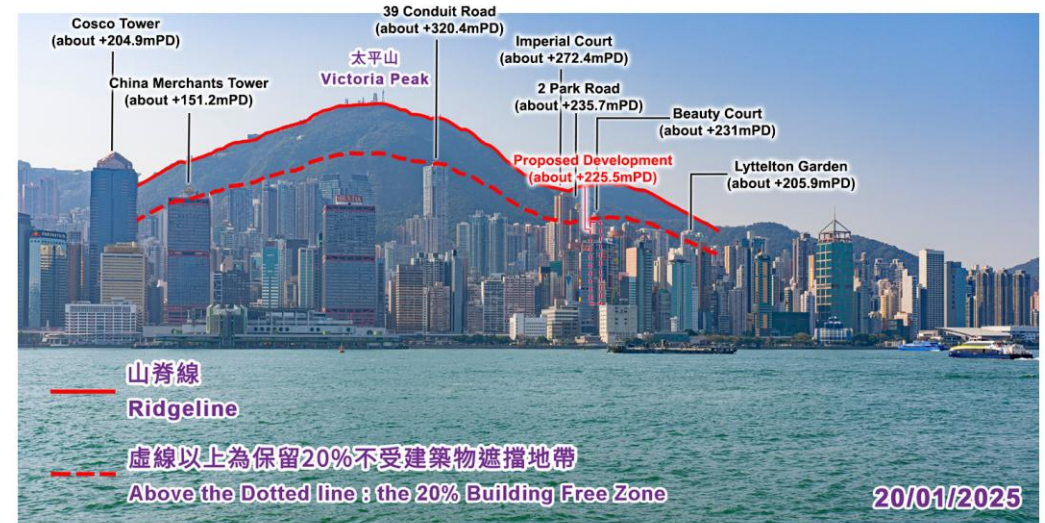
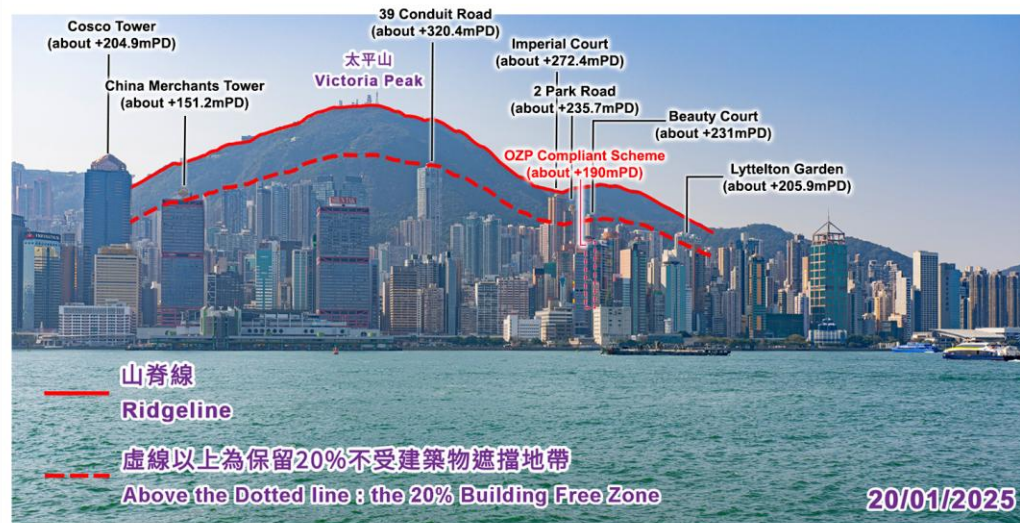
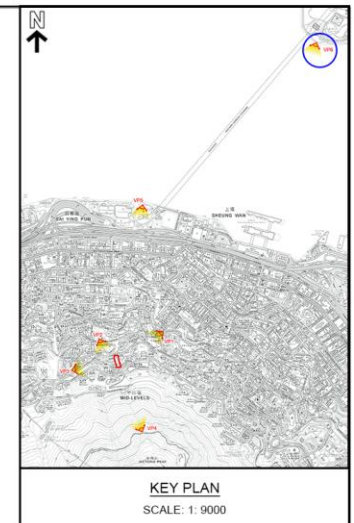
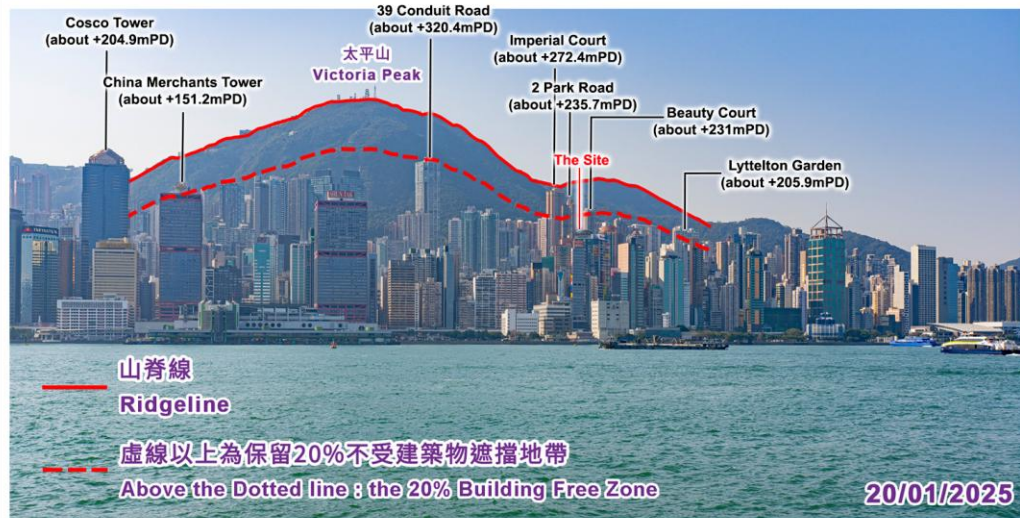
- 6.7.2 As shown in **Figure 6.6**, from this distant perspective, views towards the Proposed Development would be completely blocked by other high-rise developments. The height of the proposed building, be it at +190mPD in the OZP Compliant Scheme to +225.5mPD in the Proposed Development Scheme, would not give rise to any visual obstruction towards the mountain ridgeline nor the open sky view. Therefore, the effect of visual obstruction of the Proposed Development is considered negligible.
- 6.7.3 Chapter 11 of the Hong Kong Planning Standard and Guidelines (Urban Design Guidelines) recommends maintaining a 20% to 30% building free zone below the ridgelines when viewing from established strategic viewing points (SVPs) to safeguard the city's unique skyline and the ridgeline. Noting the importance of protecting the ridgeline when viewing from the opposite side of the Victoria Harbour, the Applicants have adopted a sensible approach when devising the Proposed Residential Development Scheme. The Applicants had thought of accommodating all the development potential at the Kotewall Road level, resulting in a taller development compared with the current proposal but having an open space between Peace Court, Imperial Court and King's Garden. Not least, the Applicants had also thought of accommodating all internal transport facilities underneath Tower 1 for easy management, better efficiency and to confine into a single ingress and egress point.
- 6.7.4 However, these would result in a building height that would encroach the 20% Building Free Zone and affect the protected ridgeline view. As a balanced approach, the Applicants chose to relocate some GFA from *Tower 1* and create a lower block at Conduit Road level coupled with a few car parking spaces. This pragmatic solution preserves the integrity of the ridgeline protection Building Free Zone, while achieves a good separation and openness for the adjoining properties. The result is a well-considered design that balances development needs, public aspirations on respecting the Building Free Zone and the amenity of the surrounding.

Visual Change

- 6.7.5 To compare between the OZP Compliant Scheme and the Proposed Scheme, the increase in BH would be unnoticeable within the context of existing and committed high-rises environment. In view of the fact that the Proposed Development would be hidden by existing developments and would blend in with the surrounding townscape harmoniously, the magnitude of visual change from VP6 is considered negligible.

Overall Visual Impact

- 6.7.6 From this cross-harbour strategic viewpoint, the proposed minor relaxation respects the ridgeline protection criteria and matches the dense urban matrix of the Hong Kong Island. Consequently, the overall visual impact at VP6 is determined to be negligible.



7 CONCLUSION AND SUMMARY

7.1.1 Based on the analysis on the appraisal of visual impact on visual composition, visual obstruction, and visual change, **Table 7.1** below presents the overall visual impact caused by the proposed minor relaxation of building height restriction as compared with the OZP Compliant Scheme from the public viewers perspective represented in each VP.

Table 7.1 Visual Impact Assessment Summary

VP	Description	Overall Visual Impact
VP1	Bonham Road Rest Garden	Negligible
VP2	West End Park	Slight
VP3	Kotewall Road Rest Garden	Negligible
VP4	Lugard Road Lookout	Slight
VP5	Sun Yat Sen Memorial Park	Negligible
VP6	Strategic Viewpoint in West Kowloon District	Negligible

7.1.2 VP1 and VP3 provide short- to mid-range street-level views to the Proposed Development from the northeast and west directions respectively. Photomontage analysis demonstrates that due to the dense urban screening from the existing buildings as well as the masking from mature roadside greenery, the Proposed Development is completely obscured from these public VPs. Consequently, the minor relaxation of the building height restriction creates no visual change to the baseline conditions, resulting in a negligible visual impact from these viewpoints.

7.1.3 VP2 and VP4 provide close-range and elevated medium-range views of the Proposed Development from the northwest and southeast orientations. While the Proposed Development introduces a localized vertical extension within a narrow structural gap at VP2 and slightly obstructs downhill greenery towards West End Park at VP4, various building consideration including the provision of 5m setback from Kotewall Road, not less than 35m building separation and provision of vertical greening has been adopted. Complemented by the prominent roadside greenery and seamless integration within the high-density residential fabric with diverse BH within the Mid-levels, the overall visual impact of the proposed minor relaxation of building height restriction is considered to be slight compared with the OZP Compliant Scheme.

7.1.4 VP5 and VP6 illustrate the popular long-range views toward the Proposed Development from low-level harborfront nodes along the Sai Ying Pun and West Kowloon promenades. From these VPs, the Proposed Development occupies an exceptionally minor visual footprint within, if any, the broader Mid-levels residential cluster. There are no encroachment to the public view corridors and the 20%

Building-Free Zone, thereby preserving the mountain ridgeline and the popular view of The Peak.

- 7.1.5 In view of the above, it is considered that the Proposed Development would be compatible with the surrounding visual character and high-density residential development in the Mid-levels. To alleviate potential visual impacts, the layout scheme has incorporated various architectural design consideration, including a voluntary 5m building setback along Kotewall Road to enhance street-level spatial relief and variations in the building height profile. Therefore, the proposed minor relaxation of the BHR to +225.5mPD is visually acceptable and highly unlikely to induce any significant adverse visual impacts.