

Appendix E

Visual Impact Assessment

Application for Planning Permission
Under Section 16 of the Town Planning
Ordinance (Cap. 131) for Proposed
Hotel Use and Minor Relaxation of Plot
Ratio and Building Height Restrictions
at “Other Specified Uses” Annotated
“Business” Zone at Tsun Wan Inland
Lot No. 46 S.C, Nos. 46-48 Pak Tin Par
Street, Tsuen Wan, New Territories

Visual Impact Assessment

Final | September 2025

This report takes into account the particular
instructions and requirements of our client.
It is not intended for and should not be relied
upon by any third party and no responsibility
is undertaken to any third party.

Job number 309824

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1. INTRODUCTION

- 1.1.1 This Visual Impact Assessment (VIA) is prepared in support of the S16 Planning Application (“the Application”) for proposed hotel use and minor relaxation of plot ratio (PR) and building height (BH) restrictions to redevelop the Application Site at Tsun Wan Inland Lot No. 46 S.C, on Nos. 46-48 Pak Tin Par Street, Tsuen Wan, New Territories (“the Application Site”). The Application Site is currently zoned as “Other Specified Uses” annotated “Business” (“OU(B)”) on the Approved Tsuen Wan Outline Zoning Plan No. S/TW/39 (“the OZP”).
- 1.1.2 According to the Notes of the OZP, ‘Hotel’ is a Column 2 use under Schedule I for building other than industrial or industrial-office building in the “OU(B)” zone, which requires planning permission from the Town Planning Board (TPB). The Application Site is also subject to a maximum PR of 9.5 or the PR of the existing building, and a maximum BH of 100mPD or the height of the existing building, whichever is the greater. As specified in the Remark (6) of the Notes for the “OU(B)” zone, minor relaxation of PR or BH restrictions may be considered by the TPB on application under Section 16 of the Town Planning Ordinance (TPO). The Application Site is the subject of two previous approved applications, including the more recent A/TW/529 which was approved with conditions for relaxation of PR restriction to 11.4 and associated relaxation of BH restriction from 100mPD to 108.305mPD for permitted office, shop and services and eating place uses.
- 1.1.3 Abutting Pak Tin Par Street, the Application Site is located within Chai Wan Kok Industrial/Business Area predominated by industrial buildings (IBs) and commercial buildings. It is currently a vacant site that was previously occupied by a pre-1987 IB until its demolition. The Application seeks approval for a proposed hotel use, minor relaxation of PR restriction by 20% (from 9.5 to 11.4) in response to the Revitalisation Scheme of Industrial Buildings (“IB Revitalisation Scheme 2.0”), and associated minor relaxation of BH restriction by about 18.9% (from 100mPD to 118.931mPD) (“the Proposed Development”). To enhance pedestrian connectivity and comfort, a 1m voluntary setback from Pak Tin Par Street is proposed with canopy above for weather protection. With ample greenery provision, terracing podium design and curving building façade design, the Application Site would positively contribute to the visual amenity of Chai Wan Kok Industrial/Business Area.
- 1.1.4 According to the Explanatory Statement of the OZP, BH restrictions are imposed to *“prevent excessively tall or out-of-context buildings and to provide better control on the building heights of developments in the Area”*. It is also stated that *“beyond the town centre, the stepped building height concept has been adopted taking into account the hilly topography, local characteristics, local wind environment, compatibility of building masses in the wider settings, as well as the need to strike a balance between public interest and private development right”*.
- 1.1.5 According to Point (e) of Para. 2.3 of the Town Planning Board Guidelines (**TPB PG**) No. 41, a VIA is required for any proposal that *“involves modification of development parameters of a site to deviate from the statutory planning restrictions applicable to the site or the neighbourhood, and the modification will amount to pronounced increase in development scale and intensity and visual changes from key public viewing points”*. The visual impacts of the Proposed Development are therefore evaluated against the approved

scheme in the recent planning approval (A/TW/529) at the Application Site, surrounding building(s) under construction and other approved development(s), in order to ensure compatibility of the Proposed Development.

1.1.6 The outline for the VIA is set out below:

- **Section 2** outlines the visual context of the Application Site and its Surrounding Area;
- **Section 3** describes the main design principles of the Proposed Development;
- **Section 4** identifies the Assessment Area and provides an analysis of the viewing points;
- **Section 5** assesses the visual impacts; and
- **Section 6** concludes the VIA.

2. VISUAL CONTEXT OF THE APPLICATION SITE AND SURROUNDING AREAS

2.1 Visual Context in the Local Area

- 2.1.1 The Application Site is located within the Chai Wan Kok Industrial/Business Area zoned “OU(B)”. A mixed cluster of industrial buildings (IBs), industrial-office buildings and commercial buildings are found in the surroundings. The Application Site abuts Pak Tin Par Street to its north, which connects to Tai Chung Road to its east and Sha Tsui Road to its south (**Figure 1** refers).
- 2.1.2 The Application Site is a vacant site that was previously occupied by a pre-1987 industrial building, the 13-storey Ideal Plaza, before its demolition in 2022. The Application Site enjoys generally high accessibility to various public transport modes, including a bus stop within 150m walking distance and MTR Tsuen Wan Station with about 850m walking distance from the Application Site. With a high accessibility, the Application Site demonstrates great potentials for quality commercial floor space provision in support of the transformation of Chai Wan Kok Industrial/Business Area from industrial to commercial and non-industrial uses, which align with the recommendations of the 2014 and 2020 Area Assessments of Industrial Land in the Territory.
- 2.1.3 Since the launch of the IB Revitalisation Scheme 2.0, a number of redevelopment projects for pre-1987 IBs in the Chai Wan Kok Industrial/Business Area with proposed minor relaxation of PR and/or BH restrictions were approved with conditions by the TPB.

Table 2.1 S16 Applications for Proposed Minor Relaxation of PR Restriction by up to 20% for Redevelopment of Industrial Buildings in Chai Wan Kok Industrial/ Business Area

Application No.	Location	Proposed Use	Proposed Minor Relaxation of PR and/or BH Restrictions	Decision
A/TW/508	18-20 Pun Shan Street	Non-polluting industrial use (Column 1 use)	PR: from 9.5 to 11.4 (+20%) BH: No change	Approved with condition(s) on 17 Jan 2020
A/TW/509	8-14 Sha Tsui Road	Non-polluting industrial use (Column 1 use)	PR: from 9.5 to 11.4 (+20%) BH: No change	Approved with condition(s) on 13 Dec 2019
A/TW/517 ^[1]	46-48 Pak Tin Par Street	Non-polluting industrial use (Column 1 use)	PR: from 9.5 to 11.4 (+20%) ^[2] BH: No change	Approved with condition(s) on 9 Oct 2020
A/TW/518	Lot 301 RP in D.D. 355, Pun Shan Street	Non-polluting industrial use (Column 1 use)	PR: from 9.5 to 11.4 (+20%) BH: No change	Approved with condition(s) on 22 Jan 2021

Application No.	Location	Proposed Use	Proposed Minor Relaxation of PR and/or BH Restrictions	Decision
A/TW/522	18-20 Pun Shan Street	Information Technology and Telecommunications Industries (Data Centre Development) (Column 1 use)	PR: from 9.5 to 11.4 (+20%) BH: from 100mPD to 116.2mPD (+16.2%)	Approved with condition(s) on 23 July 2021
A/TW/529 ^[1]	46-48 Pak Tin Par Street	Office, Shop and Services and Eating Place uses (Column 1 uses)	PR: from 9.5 to 11.4 (+20%) ^[2] BH: from 100mPD to 108.305mPD (+8.3%)	Approved with condition(s) on 28 Jan 2022

Note:

[1] They are the previous applications at the Application Site.

[2] The PR of the then existing IB was 9.832 based on the approved building plans according to the Buildings Department. Hence, the PR increase based on the PR of existing IB would be 16%.

2.1.4 The vicinity of the Application Site is characterised as below:

- To the **immediate north** of the Application Site across Pak Tin Par Street is The Mills within the same “OU(B)” zone, which is a previous IB revitalised into a tourist attraction with retail, food and beverage and recreation facilities that showcases local textile history¹. To the **immediate northeast** of the Application Site are IBs in the same “OU(B)” zone and Chinachem Tsuen Wan Plaza with retail and office uses zoned “Commercial(6)” (“C(6)”).
- To the **immediate east** of the Application Site is a 20-storey office building (known as International Enterprise Centre 3) within the same “OU(B)” zone.
- To the **immediate south** of the Application Site are mainly IBs within the same “OU(B)” zone.
- To the **immediate west** of the Application Site is a cluster of IBs and commercial buildings within the same “OU(B)” zone, including a 26-storey IB (known as Cheung Hing Shing Centre) with BH of 113.1mPD and a 23-storey office building (known as Global Plaza). To the **immediate northwest** across Pak Tin Par Street is the 21-storey Cheung Fung Industrial Building, which is zoned “OU(B)” with BH of 105.7mPD.

2.2 Visual Context in the Wider Area

2.2.1 The wider area of the Application Site is also described as following (**Figure 1** refers).

- To the **further north** across Cheung Pei Shan Road are a cluster of residential developments along Tsuen King Circuit zoned “Residential (Group A)” (“R(A)”), which includes Discovery Park with a large-scale shopping complex and residential

¹ Hong Kong Tourism Board. Source: <https://www.discoverhongkong.com/eng/explore/neighbourhoods/tsuen-wan/weaving-a-story-of-tsuen-wan-s-past.html>

towers with BH up to 156.7mPD, government facilities such as the Tsuen King Circuit Indoor Recreation Centre zoned “Government, Institution or Community” (“G/IC”) and vegetated slopes zoned “Open Space” (“O”) and “Green Belt” (“GB”).

- To the **further east** of the Application Site across Tai Chung Road is the Tsuen Wan town centre, with residential developments zoned “R(A)”, government facilities such as Heung Che Street Market zoned “G/IC”, commercial buildings such as Nam Fung Centre zoned “C” and MTR Tsuen Wan Station. Large-scale mixed-use developments such as Vision City on Citywalk could also be found there.
- To the **further south** across Sha Tsui Road is a mix of IBs and commercial buildings zoned “OU(B)”, including a 32-storey office tower (known as King Palace Plaza) with BH of 155.2mPD. There are also two IBs (known as Cable TV Tower and One midtown) that are zoned “OU(B)1” with BH of 181.2mPD and 165.9mPD respectively. Chai Wan Kok Rest Garden and Tsuen Wan Waterfront Promenade zoned “O” and MTR Tsuen Wan West Station are also located to the further south of the Application Site.
- To the **further west** of the Application Site across Sha Tsui Road is a juxtapose of industrial and commercial buildings zoned “OU(B)”, such as The Octagon which is an office tower with BH of 147.1mPD, and TML Tower which is an IB with BH of 146.8mPD.

3. THE PROPOSED DEVELOPMENT

3.1 General Planning and Design Principles

- 3.1.1 In respecting the planning and design intentions as specified in the “OU(B)” zone in the OZP as well as aligning with the Government’s policy initiatives of the IB Revitalisation Scheme 2.0, promoting tourism and attracting and nurturing talents and students, the general planning and design principles of the Proposed Development are proposed as follows:
- 3.1.2 **Redeveloping the Application Site in Response to the IB Revitalisation Scheme 2.0 and Latest Policy Initiatives of Promoting Tourism and Attracting Talents and Students** – Previously occupied by a pre-1987 IB and subject of two approved planning applications, the Application Site is proposed for hotel use with minor relaxation of PR under the IB Revitalisation Scheme 2.0, in response to the latest Government’s policy initiatives to attract talents and students and promote tourism, which are expected to drive up the demand for hotel and hotel-like accommodations in future. The proposed hotel is located at a convenient location with close proximity to transport nodes and tourist attractions such as The Mills, offering accommodation facilities to support the transformation of Tsuen Wan into a future tourist destination, which echoes the concept of “Tourism is Everywhere” as advocated in the 2025 Policy Address to boost tourism.
- 3.1.3 **Synergising with the Surrounding Commercial Development in Support of the Ongoing Transformation of Chai Wan Kok** – Sitting within the Chai Wan Kok Industrial/Business Area with an ongoing transformation to accommodate diverse commercial uses, the Application Site is adjoined by International Enterprise Centre 3 and The Mills, which are previous IBs converted into an office and a historical landmark with retail and recreation facilities respectively. The Application Site is located at a convenient location with close proximity to the surrounding commercial developments, rendering it ideal for provision of accommodation facilities that are expected to synergise with surrounding commercial developments, which aligns with the planning intention of the “OU(B)” zone to provide quality business spaces, and complements the transformation of Chai Wan Kok in line with the recommendation of the 2020 Area Assessments of Industrial Land in the Territory.
- 3.1.4 **No Development within the Western Strip of the Application Site to Respect the Existing Right of Way** – The western strip of the Application Site is currently a right-of-way (ROW), which serves escape route for the people discharged from the adjoining Goodwill Industrial Building at Nos. 36-44 Pak Tin Par Street. With due consideration of the above, no erection of structures would be proposed within the ROW.
- 3.1.5 **Provision of a Voluntary Full-Height Setback from Pak Tin Par Street with Canopy above to Enhance Pedestrian Environment** – A voluntary 1m full-height setback would be provided along Pak Tin Par Street to facilitate footpath widening and streetscape enhancement. At the eastern portion at G/F near the entrance of the Proposed Development, a further setback from Pak Tin Par Street is proposed to enhance pedestrian circulation. In addition, a 1m-wide canopy is proposed above G/F along the setback area to provide weather protection for pedestrians.

- 3.1.6 **Ample Greenery Provision and Desirable Architectural Design to Enhance Visual Quality, Microclimate Conditions and Thermal Comfort** – While the site area of the Application Site is below 1,000 m² which is not subject to the minimum requirement of site coverage of greenery under the PNAP APP-152, about 26.76% of greenery coverage is voluntarily proposed at the lower floors facing Pak Tin Par Street and the existing ROW which would be visible from the street level, enhancing visual amenity and mitigating urban heat island effect. Specifically, a landscaped sky garden with lush greenery would be provided at 4/F to improve visual amenity. Simultaneously, desirable architectural designs such as the terracing podium design from Pak Tin Par Street, a 2m setback of the tower from Pak Tin Par Street and curved building façades are also proposed to create visual interest while improving microclimate.
- 3.1.7 **Achieving Optimal Design to Accommodate the Additional PR with Insignificant Increase in BH Compatible with the Surrounding** – The proposed minor relaxation of BH restriction is mainly to accommodate the additional 20% increase in PR in response to the IB Revitalisation Scheme 2.0, as well as to overcome the unique site constraints, such as the elongated shape of the Application Site with limited frontage abutting Pak Tin Par Street which leads to a difficulty in complying with the prescribed window requirements, and the need to respect the existing ROW. The proposed minor relaxation of BH restriction is also considered necessary to accommodate the quality architectural design, with terracing podium design and the incorporation of a landscaped sky garden at 4/F. Due efforts have been made to minimise the BH increase, such as co-locating plant rooms and back-of-house facilities with hotel facilities at the same floors and proposing a reasonable floor-to-floor-height to serve the operational need for hotel accommodation in the market, while respecting the stepped BH profile descending from the developments uphill in Tsuen King Circuit to Chai Wan Kok to the waterfront area in Tsuen Wan.

3.2 Key Development Parameters

- 3.2.1 The Application seeks approval for a proposed hotel with minor relaxation of PR restriction from 9.5 to 11.4 (+20%) in response to the IB Revitalisation Scheme 2.0 and associated minor relaxation of BH restriction from 100mPD to 118.931mPD (+18.9%). A comparison between the key development parameters of the Proposed Development, the development parameters under the Approved Scheme of the previous Application No. A/TW/529 (“Approved Scheme”), and the OZP are provided in **Table 3.1** below.

Table 3.1 Comparison of Key Development Parameters between the Proposed Development, Approved Scheme and the OZP

Development Parameters	Proposed Development (a)	Approved Scheme under Application No. A/TW/529 (b)	Difference (a) – (b)	Development Parameters under the OZP
Site Area	About 721.59 m ²	About 721.59 m ²	<u>N/A</u>	<u>N/A</u>
Proposed Use	‘Hotel’ is a Column 2 use	‘Office’, ‘Shop and Services’ and ‘Eating Place’ are Column 1 uses	Column 2 Use (Requiring Permission from the TPB)	‘Office’, ‘Shop and Services’ and ‘Eating Place’ are Column 1 uses ‘Hotel’ is a Column 2 use
Plot Ratio (PR)	Not more than 11.4	Not more than 11.4	-	Not more than 9.5
Gross Floor Area (GFA)	About 8,226.13 m ² ^[1]	About 8,226.13 m ²	-	About 6,855.11 m ²
Building Height	Not more than 118.931mPD	Not more than 108.305mPD	+10.626m	Not more than 100mPD
No. of Storeys	28 (Including G/F for car parking and loading/unloading space)	27 (Including three basement levels and G/F for car parking and loading/unloading space)	+1	<u>N/A</u>
Site Coverage (SC)	Below 15m: Not more than 100% ^[1] Above 15m but below 20m: Not more than 100% ^[2] Above 20m: Not more than 60% ^[2]	Below 15m: Not more than 86.3% Above 15m: Not more than 58.76%	Below 15m: +13.7% Above 15m but below 20m: +41.24% Above 20m: +1.24%	<u>N/A</u>
No. of Blocks	1	1	-	<u>N/A</u>
No. of Hotel Rooms	About 299	<u>N/A</u>	-	<u>N/A</u>
Average Hotel Room Size	About 29.19 m ²	<u>N/A</u>	-	<u>N/A</u>
Floor-to-Floor Height (FTFH)	G/F: 6.4 m 1/F to 2/F: 4.3 m 3/F: 4.75 m Sky Garden: 6 m (excluding structure & services zone) Refuge Floor: 2.3 m (excluding structure & services zone) Typical Hotel Floor: about 3.6 m	B3/F: 5.65m B1/F to B2/F: 3.95m G/F: 5.5 m 1/F: 4.55m Typical Shop and Services / Eating Place floor: 4.55m E&M floor: 2.55m Sky Garden cum Refuge Floor: 5.1 m Typical Office Floor: 4.1 m Top Office Floor: 4.375 m	-	<u>N/A</u>
Greenery Provision	About 26.76% of total site area	About 26.76% of total site area	-	<u>N/A</u>
Internal Transport Provision				
No. of Private Car Parking Space	3	55	-52	<u>N/A</u>
No. of Motorcycle Parking Space	1	6	-5	N/A

Development Parameters	Proposed Development (a)	Approved Scheme under Application No. A/TW/529 (b)	Difference (a) – (b)	Development Parameters under the OZP
No. of Loading/Unloading (L/UL) Bay	HGV: 1 LGV: 1	HGV: 1 LGV: 4	- -3	N/A
No. of Lay-by	Taxi and Private Cars: 2 Single-deck Tour Buses: 1	Taxi and Private Cars: 0 Single-deck Tour Buses: 0	+2 +1	N/A
Anticipated Completion Year	About 2030	2025	-	<u>N/A</u>

Remarks:

- (1) Refer to Cap.123F Building (Planning) Regulations and PNAP APP-19, canopy from the face of building should be disregarded for Site Coverage and PR Calculation (GFA exemption subject to BD's comment in detailed design stage).
- (2) The podium height is proposed to be 20m above the ground level. According to the PNAP APP-101, modification of the Building (Planning) Regulation 20(3) which restricts the full site coverage of non-domestic podium would be proposed on the grounds that the increase in podium height of the proposed building would give a better aesthetic or environmental effect, and the building is of special design.

4. ASSESSMENT AREA & SELECTION OF VIEWING POINTS

4.1.1 According to the TPB PG No. 41, the Assessment Area is defined by approximately three times of overall building height of the Proposed Development, i.e. 113.586m (118.931mPD with 5.345mPD at ground level). Thus, a radius of about 340.758m from the boundary of the Application Site defines the boundary of the Assessment Area, within which key public viewing points (VPs) are selected for assessment accordingly (**Figure 2** refers).

4.1.2 When assessing the potential visual impacts of the Proposed Development, the classification of VPs is categorised as follows:

Table 4.1 Classification of Visual Sensitivity

Receivers	Main Activities	Sensitivity
Recreational	Those viewers who would view the Application Site while engaging in recreational activities	High
Travellers	Those viewers who would view the Application Site from vehicles or on foot	Medium
Occupational	Those viewers who would view the Application Site from their workplaces	Low

4.1.3 The Application Site is the subject of two previous Approved Applications, with the latest one being Planning Application No. A/TW/529 with proposed relaxation of PR restriction to 11.4 under the IB Revitalisation Scheme 2.0 and BH restriction from 100mPD to 108.305mPD . In view of the planning history of the Application Site, this VIA will compare the visual impacts between the Proposed Development and the Approved Scheme under Planning Application No. A/TW/529 through the eight selected VPs adopted in the Approved Planning Application . They include short-, medium- and long-range VPs that are considered as the most affected by any development on the Application Site (**Figure 2** refers). They include:

4.1.4 **VP1: Footbridge across Tai Chung Road near the intersection with Sha Tsui Road –** To the southeast of the Application Site, this VP is taken at a footbridge across Tai Chung Road that connects the residential developments along Sha Tsui Road to the industrial and commercial buildings in Chai Wan Kok. The nature of this VP is transient. It represents short-range views of pedestrians approaching the Chai Wan Kok Industrial / Business Area. The visual sensitivity of this VP is considered **medium**.

4.1.5 **VP2: Footbridge across Tai Chung Road near the intersection with Hoi Shing Road –** To the further south of the Application Site, this VP is taken at a footbridge across Tai Chung Road that connects the residential and commercial developments along Hoi Shing Road and Yeung Uk Road to the industrial and commercial buildings in Chai Wan Kok and open space including Chai Wan Kok Rest Garden and Hoi Shing Garden. Although the nature of this VP is transient, it represents medium-range visual impacts of pedestrians using the footbridge and is frequented by pedestrians for various purposes, including commercial and recreational activities. Thus, the visual sensitivity of this VP is considered **high**.

- 4.1.6 **VP3: Tsuen Wan Promenade near the intersection between Hoi On Road and Hoi Hing Road** – Situated to the southwest of the Application Site, this VP is taken at a popular gathering point along the Tsuen Wan Promenade, which is furnished with various leisure facilities and occasionally utilised as a temporary event space. This VP represents long-range views of pedestrians along the Tsuen Wan Promenade and users engaging in recreational activities. The visual sensitivity of this VP is considered **high**.
- 4.1.7 **VP4: Tsuen King Circuit Recreation Ground and Rest Garden** – Located to the northwest of the Application Site, this VP is taken at the entrance of Tsuen King Circuit Recreation Ground and Rest Garden opposite to Tsuen King Circuit Playground, where a variety of recreational facilities such as sports courts and children’s playgrounds are provided. It represents long-range views of playground users in the upper part of Tsuen King Circuit at the hillside. The visual sensitivity of this VP is considered **high**.
- 4.1.8 **VP5: Pavilion near the car park in Muk Min Ha Tsuen** – This VP locates to the northeast of the Application Site at the hillside of Fu Yung Shan. Adjacent to the car park in Muk Min Ha Tsuen, the pavilion serves as a gathering and resting place for the residents. This VP represents long-range views of pedestrians living in Muk Min Ha Tsuen and users engaging in passive recreational activities. Since it is located in a relatively remote area with patronage mainly from the surrounding Muk Min Ha Tsuen, the visual sensitivity of this VP is considered **medium**.
- 4.1.9 **VP6: On-street loading/unloading area along Pak Tin Par Street** – Located to the west of the Application Site, this VP is taken at the sidewalk by the on-street loading/unloading area. The nature of this VP is transient. It represents short-range views of road users and pedestrians along Pak Tin Par Street. The visual sensitivity of this VP is considered **low**.
- 4.1.10 **VP7: Pavilion along Cheung Pei Shan Road** - Located to the north of the Application Site, this VP is taken at a pavilion along an elevated walkway separated from the adjacent footpath along Cheung Pei Shan Road. It represents medium-range views of pedestrians and users staying in the pavilion for passive recreational activities. Hence, the visual sensitivity of this VP is considered **high**.
- 4.1.11 **VP8: Footbridge across Tai Chung Road near the intersection with Pak Tin Par Street** – To the east of the Application Site, this VP is taken at a footbridge across Tai Chung Road that connects Tsuen Wan Station, Discovery Park and other residential developments along Hoi Pa Street to the industrial and commercial buildings in Chai Wan Kok. The nature of this VP is transient. It represents short-range visual impacts of pedestrians arriving from Tsuen Wan Station and approaching the Chai Wan Kok Industrial/Business Area. The visual sensitivity of this VP is considered **medium**.

5. ASSESSMENT OF VISUAL IMPACT

- 5.1.1 This Section evaluates the visual impact of the Proposed Development by comparing with the Approved Scheme under Application No. A/TW/529. Reference is made to TPB PG No. 41 and the visual appraisal for the Proposed Development is carried out on the aspects of ‘visual composition’, ‘visual obstruction’, ‘effect on public viewers’ and ‘effect on visual resources’². The overall visual impacts of the Proposed Development as compared to the Approved Scheme (Application No. A/TW/529) are appraised based on the classifications of visual impacts as set out in the TPB PG No. 41, which include ‘enhanced’, ‘partly enhanced/partly adverse’, ‘negligible’, ‘slightly adverse’, ‘moderately adverse’ and ‘significantly adverse’³.

VP1: Footbridge across Tai Chung Road near the intersection with Sha Tsui Road (Figure 3 refers)

- 5.1.2 This short-range kinetic VP represents pedestrians passing by the footbridge above Sha Tsui Road near the intersection with Sha Tsui Road. Future development at the Application Site is completely screened off by the existing IB (known as Superluck Industrial Centre Phase 2) in the foreground under both the Approved Scheme and the Proposed Development.
- 5.1.3 **Effects on Visual Composition** – The IB named as Superluck Industrial Centre Phase 2 forms the foreground, while the middle-ground is composed of other IBs and commercial buildings along Tai Chung Road. The open sky and the residential development known as Discovery Park form the background of this VP. Due to attenuation of distance, the Application Site under both the Approved Scheme and Proposed Development would be fully screened off by Superluck Industrial Centre Phase 2 in the foreground. Thus, the impact on visual composition is considered **negligible**.
- 5.1.4 **Effects on Visual Obstruction, Public Viewers and Visual Resources** – As the Application Site would be fully screened off by Superluck Industrial Centre Phase 2 in the foreground under both Approved Scheme and Proposed Development, there will be **negligible** impacts on visual obstruction, public viewers and visual resources with the Proposed Development from this VP.
- 5.1.5 In conclusion, the Proposed Development would generate **negligible** impacts to the area from this VP as compared to the Approved Scheme.

VP2: Footbridge across Tai Chung Road near the intersection with Hoi Shing Road (Figure 4 refers)

- 5.1.6 This medium-range kinetic VP represents pedestrians passing by the footbridge above Sha Tsui Road near the intersection with Hoi Shing Road. Similar to VP1, the Application Site is fully hidden by the existing IB (known as Wah Chun Industrial Centre) in the foreground under both the Approved Scheme and the Proposed Development.

² Para. 4.10 of the TPB PG No. 41 refers.

³ Para. 4.11 of the TPB PG No. 41 refers.

- 5.1.7 **Effects on Visual Composition** – The IBs named as Wah Chun Industrial Centre, Wing Hing Industrial Building and Glee Industrial Building form the foreground, while the middle-ground comprises other IBs along Tai Chung Road and the commercial building named as King Palace Plaza with BH of about 155.2mPD. The open sky and the residential development known as Discovery Park constitute the background of this VP. Due to attenuation of distance, both the Approved Scheme and Proposed Development would be fully screened off by Wan Chun Industrial Centre in the foreground. Thus, the visual composition is considered **negligible**.
- 5.1.8 **Effects on Visual Obstruction, Public Viewers and Visual Resources** – As the Application Site is fully screened off by Wan Chun Industrial Centre in the foreground under both Approved Scheme and Proposed Development, there would be **negligible** impacts on visual obstruction, public viewers and visual resources with the Proposed Development from this VP.
- 5.1.9 To summarise, the Proposed Development would generate **negligible** impacts to the area from this VP as compared to the Approved Scheme.

VP3: Tsuen Wan Promenade near the intersection between Hoi On Road and Hoi Hing Road (Figure 5 refers)

- 5.1.10 This long-range VP represents pedestrians along the Tsuen Wan Promenade and users engaging in recreational activities. The Application Site is fully screened off by existing IBs under both the Approved Scheme and the Proposed Development.
- 5.1.11 **Effects on Visual Composition** – The Tsuen Wan Promenade and its recreational facilities form the foreground, while the middle-ground consists of IBs and commercial buildings along Hoi Shing Road, including Cable TV Tower with BH of 181.2mPD and One Midtown with BH of 165.9mPD. The open sky, Tsuen Wan Plaza and Clague Garden Estate form the background of this VP. The Application Site is fully screened off under both the Approved Scheme and the Proposed Development by Cable TV Tower and One Midtown. Thus, there would be **negligible** impacts on visual composition.
- 5.1.12 **Effects on Visual Obstruction, Public Viewers and Visual Resources** – As the Application Site is fully screened off by Cable TV Tower and One Midtown in the middle-ground under both the Approved Scheme and Proposed Development, there would be **negligible** impacts on visual obstruction, public viewers and visual resources with the Proposed Development from this VP.
- 5.1.13 In short, the Proposed Development would generate **negligible** impacts to the area from this VP as compared to the Approved Scheme.

VP4: Tsuen King Circuit Recreation Ground and Rest Garden (Figure 6 refers)

- 5.1.14 This long-range VP represents users engaging in recreational activities in Tsuen King Circuit Playground. The Application Site is fully hidden by existing residential towers of the Tsuen Wan Centre and the Chai Wan Kok Catholic School under both the Approved Scheme and Proposed Development.
- 5.1.15 **Effects on Visual Composition** – Trees and shrubs at the entrance of Tsuen King Circuit Recreation Ground and Rest Garden form the foreground, while the middle-ground

comprises Tsuen King Circuit Playground and Chai Wan Kok Catholic School. The residential development known as Tsuen Wan Centre forms the background. Due to attenuation of distance, the Application Site under both the Approved Scheme and Proposed Development would be fully screened off by Chai Wan Kok Catholic School in the middle-ground and Tsuen Wan Centre in the background. Thus, the visual composition is considered **negligible**.

5.1.16 **Effects on Visual Obstruction, Public Viewers and Visual Resources** – As the Application Site is fully screened off by Chai Wan Kok Catholic School in the middle-ground and Tsuen Wan Centre in the background under both the Approved Scheme and Proposed Development, there would be **negligible** impacts on visual obstruction, public viewers and visual resources with the Proposed Development from this VP.

5.1.17 In summary, the Proposed Development would generate **negligible** impacts to the area from this VP as compared to the Approved Scheme.

VP5: Pavilion near the car park in Muk Min Ha Tsuen (Figure 7 refers)

5.1.18 This long-range VP represents pedestrians living in Muk Min Ha Tsuen and users engaging in passive recreational activities (sitting out). The Application Site is completely screened off by the existing CDW Building and Discovery Park under both the Approved Scheme and the Proposed Development.

5.1.19 **Effects on Visual Composition** – Fu Yung Shan Road forms the foreground while the vegetation along the slope constitutes the middle-ground. The background is composed of the open sky, Tsuen Wan Government Offices, industrial-office buildings named as Mega-trade Centre and CDW Building, and residential towers of Discovery Park with BH up to 156.7mPD. The Application Site under both the Approved Scheme and Proposed Development would be fully screened off by both CDW Building and Discovery Park in the background. Thus, the visual composition is considered **negligible**.

5.1.20 **Effects on Visual Obstruction, Public Viewers and Visual Resources** – As the Application Site is fully screened off by CDW Building and Discovery Park in the background under both Approved Scheme and Proposed Development, there would be **negligible** impacts on visual obstruction, public viewers and visual resources with the Proposed Development from this VP.

5.1.21 In conclusion, the Proposed Development would generate **negligible** impacts to the area from this VP as compared to the Approved Scheme.

VP6: On-street loading/unloading area along Pak Tin Par Street (Figure 8 refers)

5.1.22 This short-range VP represents road users and pedestrians near the on-street loading/unloading area along Pak Tin Par Street. Part of the Application Site would be visible in the middle-ground under both the Approved Scheme and the Proposed Development, while majority part would be screened off by the adjoining Goodwill Industrial Building and iTech Tower.

5.1.23 **Effects on Visual Composition** – The visual composition of this VP consists of Cheung Fung Industrial Building and iTech Tower on both sides of Pak Tin Par Street in the foreground. The middle-ground comprises Pak Tin Par Street at the centre with IBs, the

Mills and the Proposed Development on both sides, while the background is composed of the open sky and TCL Tower. Minor increase in BH of the Proposed Development as compared to the Approved Scheme would not be visible from this VP. In addition, the Proposed Development includes modern building design similar to the Approved Scheme such as the curved building façade at the upper floors and greenery at the landscaped sky garden, which enhances visual amenity of this VP dominated by the monotonous IBs. Thus, compared with the Approved Scheme, the Proposed Development would bring **negligible** impacts on visual composition.

- 5.1.24 **Effects on Visual Obstruction** – As compared with the Approved Scheme, the increase in BH of the Proposed Development would not be visible from this VP. Hence, there would be no additional obstruction of the open sky view above Pak Tin Par Street. The Proposed Development would therefore bring **negligible** impacts on visual obstruction and permeability.
- 5.1.25 **Effects on Public Viewers** – This VP indicates that the Proposed Development is well-blended with the IBs along Pak Tin Par Street, and the proposed increase in BH as compared to the Approved Scheme would not be visible from this VP and draw public attention. Similar to the Approved scheme, the landscaped sky garden with greenery is also provided at 4/F which is visible from this VP and enhances visual amenity of the area. Hence, the Proposed Development would bring **negligible** impacts on public viewers.
- 5.1.26 **Effects on Visual Resources** – Since the additional increase in BH is not visible from this VP, there would be no impacts on the open sky view at the background as compared to the Approved Scheme. The open vista towards Tai Chung Road would be preserved. Therefore, the Proposed Development would bring **negligible** impacts to visual elements and resources.
- 5.1.27 In short, since the BH increase is not visible from this VP, the Proposed Development would generate **negligible** impacts to the area as compared to the Approved Scheme.

VP7: Pavilion along Cheung Pei Shan Road (Figure 9 refers)

- 5.1.28 This medium-range VP represents pedestrians and users engaging in passive recreational activities in the pavilion. A small part of the Application Site would be visible under both the Approved Scheme and the Proposed Development.
- 5.1.29 **Effects on Visual Composition** – Cheung Pei Shan Road and roadside trees form the foreground of this VP, while the Mills and Cheung Fung Industrial Building across the road constitute the middle-ground. The background consists of the open sky, Wah Lik Industrial Centre, International Enterprise Centre 3 and the Application Site under both the Approved Scheme and Proposed Development. Nevertheless, only a small part of the Application Site would be seen, while most part would be completely screened off by Cheung Fung Industrial Building. In addition, Cheung Fung Industrial Building at the middle-ground is significantly taller than the Application Site under both Approved Scheme and Proposed Development due to attenuation of distance from this VP. While the minor increase in BH of the Proposed Development as compared to the Approved Scheme would be visible, the difference is considered visually insignificant due to the visual dominance of the Cheung Fung Industrial Building in the foreground. Thus, the Proposed Development would bring **negligible** impacts on visual composition as compared with the Approved Scheme.

- 5.1.30 **Effects on Visual Obstruction** – While there is a minor increase in BH under the Proposed Development observed from this VP as compared to the Approved Scheme, majority of the Proposed Development will be screened off by Cheung Fung Industrial Building which makes the additional obstruction to the open sky view unobvious. Thus, the Proposed Development would bring **slightly adverse** impacts on visual obstruction and permeability as compared to the Approved Scheme.
- 5.1.31 **Effects on Public Viewers** – With only a minor increase in BH of the Proposed Development as compared to the Approved Scheme, the difference would not draw public attention as the Proposed Development is visually integrated with the existing Cheung Fung Industrial Building in the middle-ground and International Enterprise Centre 3 in the background. The Proposed Development would remain significantly shorter than Cheung Fung Industrial Building due to attenuation of distance and compatible with the rest of the IBs in the surrounding area. Hence, the Proposed Development would bring **negligible** impacts on public viewers as compared to the Approved Scheme.
- 5.1.32 **Effects on Visual Resources** – From this VP, a small portion of sky view along the edge of Cheung Fung Industrial Building would be obstructed in both the Approved Scheme and Proposed Development. While the increase in BH in the Proposed Development would result in minor further obstruction of the sky view, it is noted that the wider open sky view in the left-hand side of this VP remains unaffected. Hence, the Proposed Development would bring **negligible** effects to visual elements and resources as compared to the Approved Scheme.
- 5.1.33 In summary, while there would be a small obstruction to the sky view due to the minor increase in BH, there would be negligible impacts on the visual composition, public viewers and visual resources. Overall speaking, the Proposed Development would bring **negligible** impacts to the area from this VP as compared to the Approved Scheme.

VP8: Footbridge across Tai Chung Road near the intersection with Pak Tin Par Street (Figure 10 refers)

- 5.1.34 This short-range VP represents pedestrians arriving from Tsuen Wan Station and approaching the Chai Wan Kok Industrial/Business Area. A small part of the Application Site would be visible under both the Approved Scheme and Proposed Development in a small gap between two existing buildings.
- 5.1.35 **Effects on Visual Composition** – From this VP, TCL Tower and International Enterprise Centre 3 form the foreground, with the Application Site appearing in the small gap between the two buildings under both the Approved Scheme and the Proposed Development. Tai Chung Road and other IBs along the road constitute the middle-ground, while the background consists of Clague Garden Estate and the open vista towards the waterfront in Tsuen Wan. While there is an increase in BH in the Proposed Development as compared to the Approved Scheme, the visual impact is considered trivial since only a tiny part of the Application Site would be visible in the small gap between TCL Tower and International Enterprise Centre 3, while the remaining part would be completely screened off from this VP. In addition, the Proposed Development is much shorter than TCL Tower and International Enterprise Centre 3 in the foreground due to attenuation of distance, which allows the Proposed Development to blend with the existing buildings.

Thus, the Proposed Development would bring **negligible** impacts on visual composition as compared to the Approved Scheme.

- 5.1.36 **Effects on Visual Obstruction** – While there is an increase in BH under the Proposed Development, the additional obstruction of the sky view would only take place in the small gap between TCL Tower and International Enterprise Centre 3. No obstruction of the wider open sky view in the background would be resulted. Thus, the Proposed Development would bring **negligible** impacts on visual obstruction and permeability as compared to the Approved Scheme.
- 5.1.37 **Effects on Public Viewers** – While the proposed increase in BH as compared to the Approved Scheme would be visible from this VP, the difference is unlikely to be observed by public as most of the Application Site would be hidden by the existing TCL Tower and International Enterprise Centre 3 in the foreground. The Proposed Development would remain significantly shorter than the two buildings from this VP due to attenuation of distance, rendering the BH increase visually insignificant. Hence, the Proposed Development would bring **negligible** impacts on public viewers.
- 5.1.38 **Effects on Visual Resources** – From this VP, only the sky view in the tiny gap between TCL Tower and International Enterprise Centre 3 would be obstructed in both the Approved Scheme and Proposed Development. The open sky view in the left-hand side, which is a key visual resource of the VP, would not be affected. Since the open vista towards the waterfront in Tsuen Wan would be preserved, the Proposed Development is expected to bring **negligible** impacts on visual elements and resources.
- 5.1.39 In short, given that the Proposed Development would be visually integrated with the existing buildings and result in no obstruction of the open sky view, there would be **negligible** impacts to the area from this VP as compared to the Approved Scheme.

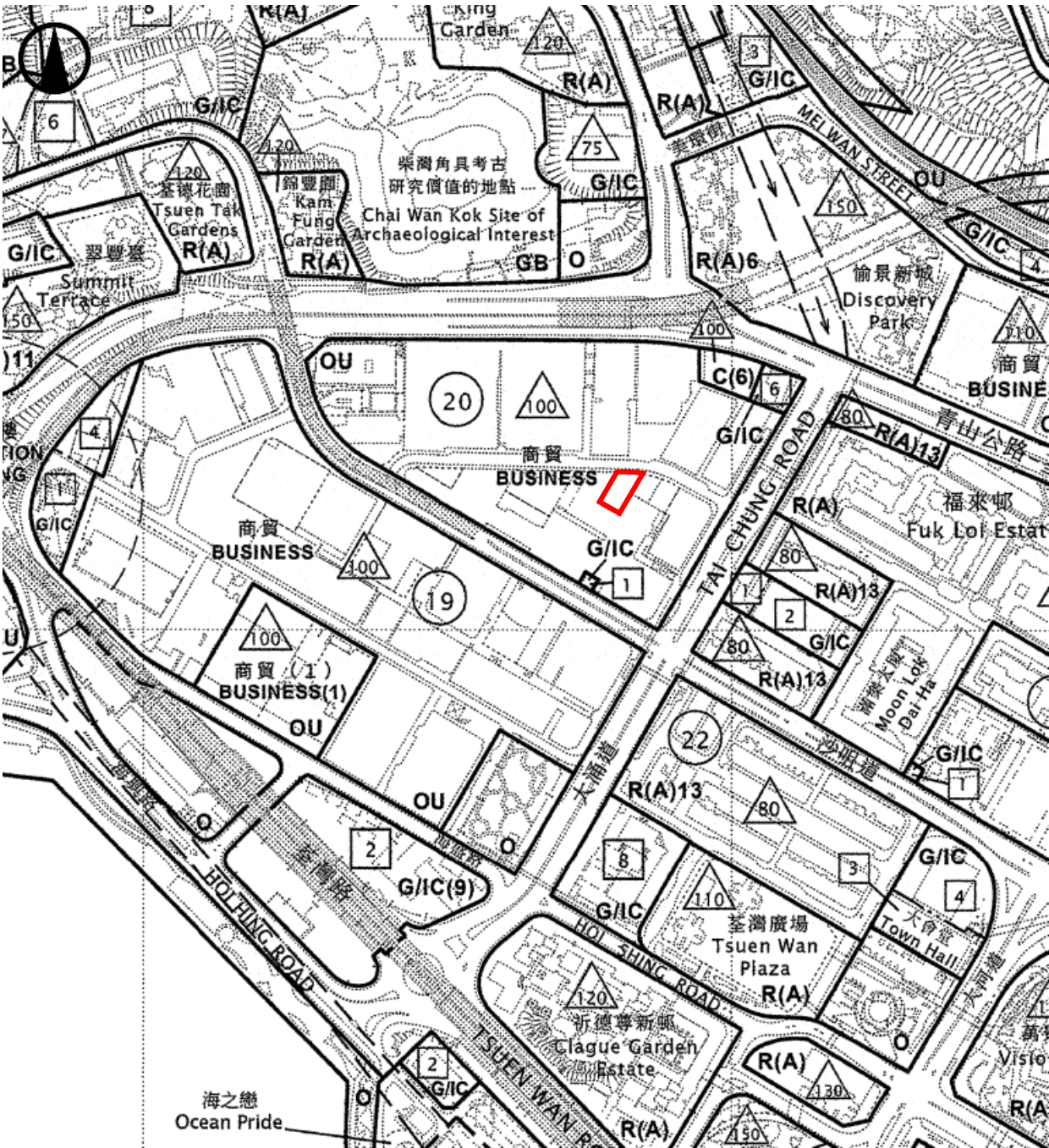
Table 5.1 Visual Impact Assessment Summary

VP	Visual Sensitivity	Appraisal Components				Conclusion
		Visual Composition	Visual Obstruction	Effect on Public Viewers	Effect on Visual Resources	
VP1 Footbridge across Tai Chung Road near the intersection with Sha Tsui Road	Medium	Negligible	Negligible	Negligible	Negligible	Negligible
VP2 Footbridge across Tai Chung Road near the intersection with Hoi Shing Road	High	Negligible	Negligible	Negligible	Negligible	Negligible
VP3 Tsuen Wan Promenade near the intersection between Hoi On Road and Hoi Hing Road	High	Negligible	Negligible	Negligible	Negligible	Negligible
VP4 Tsuen King Circuit Recreation Ground and Rest Garden	High	Negligible	Negligible	Negligible	Negligible	Negligible
VP5 Pavilion near the car park in Muk Min Ha Tsuen	Medium	Negligible	Negligible	Negligible	Negligible	Negligible
VP6 On-street loading/unloading area along Pak Tin Par Street	Low	Negligible	Negligible	Negligible	Negligible	Negligible
VP7 Pavilion along Cheung Pei Shan Road	High	Negligible	Slightly Adverse	Negligible	Negligible	Negligible
VP8 Footbridge across Tai Chung Road near the intersection with Pak Tin Par Street	Medium	Negligible	Negligible	Negligible	Negligible	Negligible

6. CONCLUSION

- 6.1.1 The VIA is prepared in support of the S16 Planning Application for proposed hotel use and minor relaxation of PR restriction (from 9.5 to 11.4, +20%) at Tsun Wan Inland Lot No. 46 S.C, Nos. 46-48 Pak Tin Par Street, Tsuen Wan, New Territories, which is currently vacant and was previously occupied by a pre-1987 IB. The Application also seeks for minor relaxation of BH restriction (from 100mPD to 118.931mPD, +18.9%) to accommodate the proposed 20% increase in PR restriction, as well as incorporate desirable architectural design such as the full-height setback from Pak Tin Par Street, curved building façade, the provision of a landscaped sky garden and terracing podium design.
- 6.1.2 Various planning and design merits are introduced to enhance the pedestrian connectivity and comfort on street level, while ample greening provision has been optimised to contribute to landscape amenity and micro-climate conditions. Besides the voluntary 1m full-height setback provision from Pak Tin Par Street with canopy for weather protection, the Proposed Development also provides lush greenery at the lower floors visible from the street level to enhance visual amenity and pedestrian comfort. In addition, efforts have been made as far as possible to minimise the increase in BH while ensuring the provision of quality hotel space that establishes a desirable precedent in expediting the ongoing transformation of Chai Wan Kok Industrial/Business Area, and responds to the policy to meet increasing demand arising from tourists, talents and students in Hong Kong.
- 6.1.3 A total of eight VPs were assessed in this Visual Impact Assessment, covering short, medium and long-range distances. All of them are identified with negligible impacts under the Proposed Development as compared to the Approved Scheme under Planning Application No. A/TW/529. In summary, the Proposed Development is considered to be fully acceptable in terms of visual impacts and compatibility with the surrounding built environment, building form and scale.

FIGURES



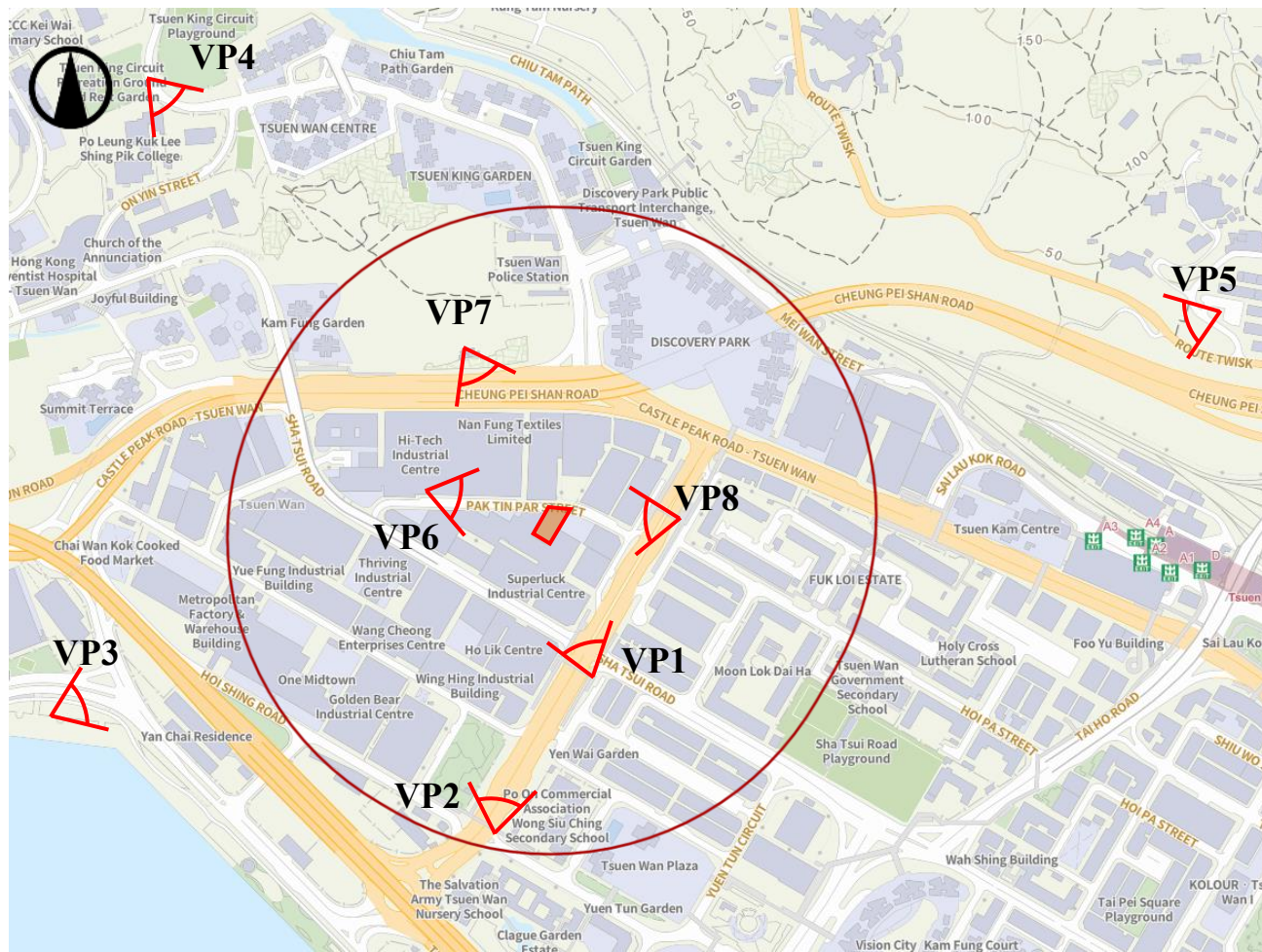
LEGEND

 Application Site

ZONING

- C Commercial
- R(A) Residential (Group A)
- G/IC Government, Institution or Community
- GB Green Belt
- OU Other Specified Uses
- O Open Space

Figure No.	Scale	Figure Title
1	-	Location Plan
ARUP	Date	Source
	September 2025	Extracted from the Approved Tsuen Wan Outline Zoning Plan (No. S/TW/39)



LEGEND



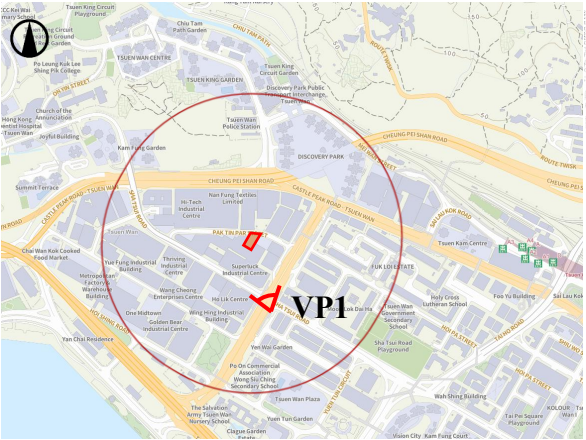
Application Site



Assessment Area (3 x 113.586m = 340.758m)

- ❖ **VP1:** Footbridge across Tai Chung Road near the intersection with Sha Tsui Road
- ❖ **VP2:** Footbridge across Tai Chung Road near the intersection with Hoi Shing Road
- ❖ **VP3:** Tsuen Wan Promenade near the intersection between Hoi On Road and Hoi Hing Road
- ❖ **VP4:** Tsuen King Circuit Recreation Ground and Rest Garden
- ❖ **VP5:** Pavilion near the car park in Muk Min Ha Tsuen
- ❖ **VP6:** On-street loading/unloading area along Pak Tin Par Street
- ❖ **VP7:** Pavilion along Cheung Pei Shan Road
- ❖ **VP8:** Footbridge across Tai Chung Road near the intersection with Pak Tin Par Street

Figure No.	Scale	Figure Title
2	-	Assessment Area and Location of Viewing Points
ARUP	Date September 2025	Source GeoInfo Map

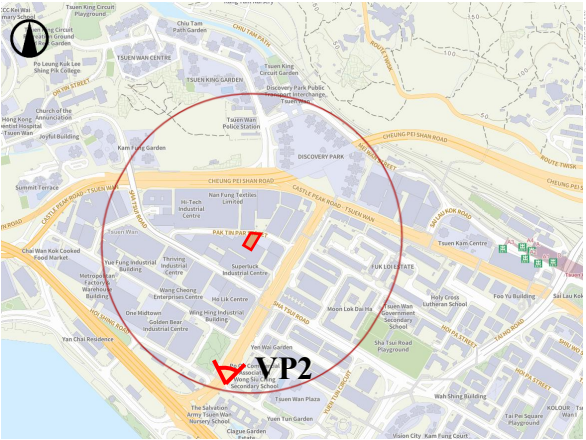


Approved Scheme under Application No. A/TW/529
(Image extracted from VIA of the Application No. A/TW/529)



Proposed Development

Figure No.	Scale	Figure Title
3	-	Viewing Point 1 - Footbridge across Tai Chung Road near the intersection with Sha Tsui Road
ARUP	Date	Source
	September 2025	Photomontage for illustrative purpose only



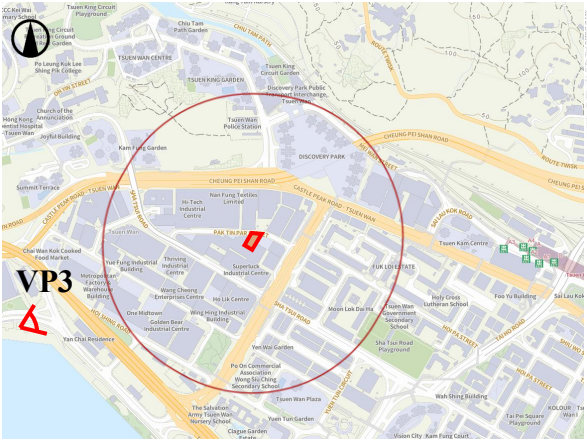
Approved Scheme under Application No. A/TW/529

(Image extracted from VIA of the Application No. A/TW/529)



Proposed Development

Figure No.	Scale	Figure Title
4	-	Viewing Point 2 - Footbridge across Tai Chung Road near the intersection with Hoi Shing Road
ARUP	Date	Source
	September 2025	Photomontage for illustrative purpose only



Approved Scheme under Application No. A/TW/529
(Image extracted from VIA of the Application No. A/TW/529)



Proposed Development

Figure No. 5	Scale -	Figure Title Viewing Point 3 - Tsuen Wan Promenade near the intersection between Hoi On Road and Hoi Hing Road
ARUP	Date September 2025	Source Photomontage for illustrative purpose only

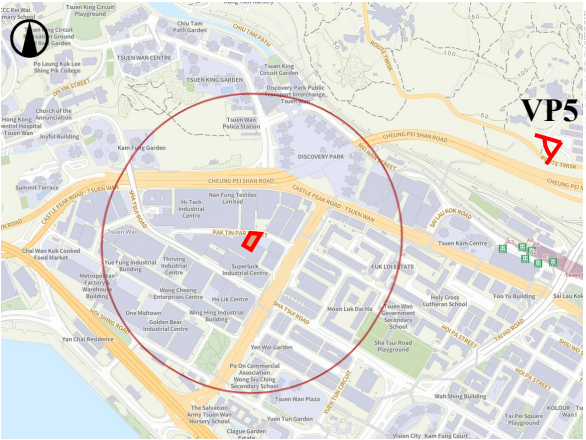


Approved Scheme under Application No. A/TW/529
(Image extracted from VIA of the Application No. A/TW/529)

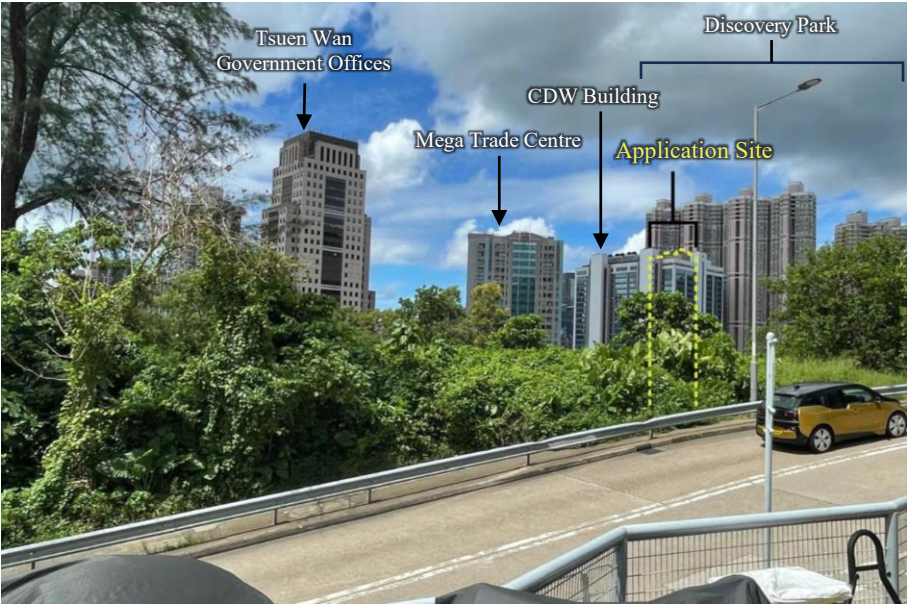


Proposed Development

Figure No.	Scale	Figure Title	Viewing Point 4 - Tsuen King Circuit Recreation Ground and Rest Garden
6	-	Source	
ARUP	Date	September 2025	Photomontage for illustrative purpose only

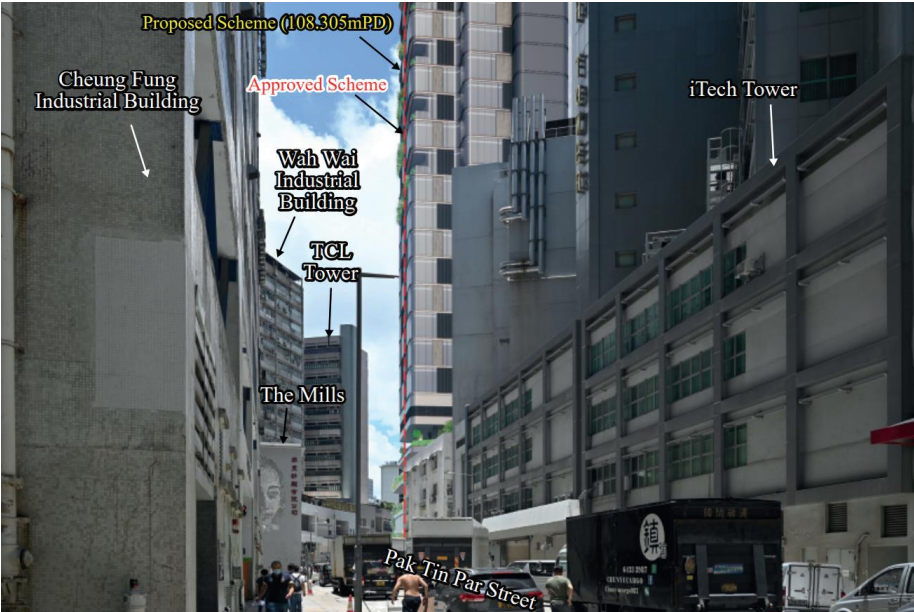
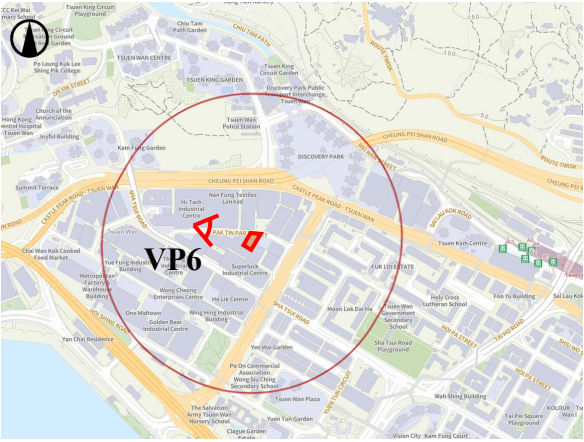


Approved Scheme under Application No. A/TW/529
(Image extracted from VIA of the Application No. A/TW/529)



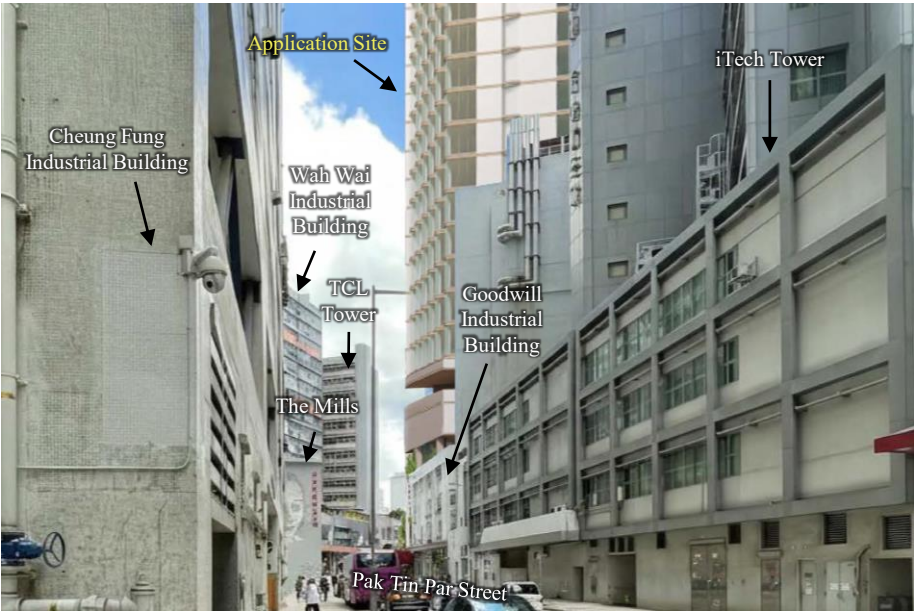
Proposed Development

Figure No.	Scale	Figure Title	Viewing Point 5 - Pavilion near the car park in Muk Min Ha Tsuen
7	-	Source	Photomontage for illustrative purpose only
ARUP	Date	September 2025	



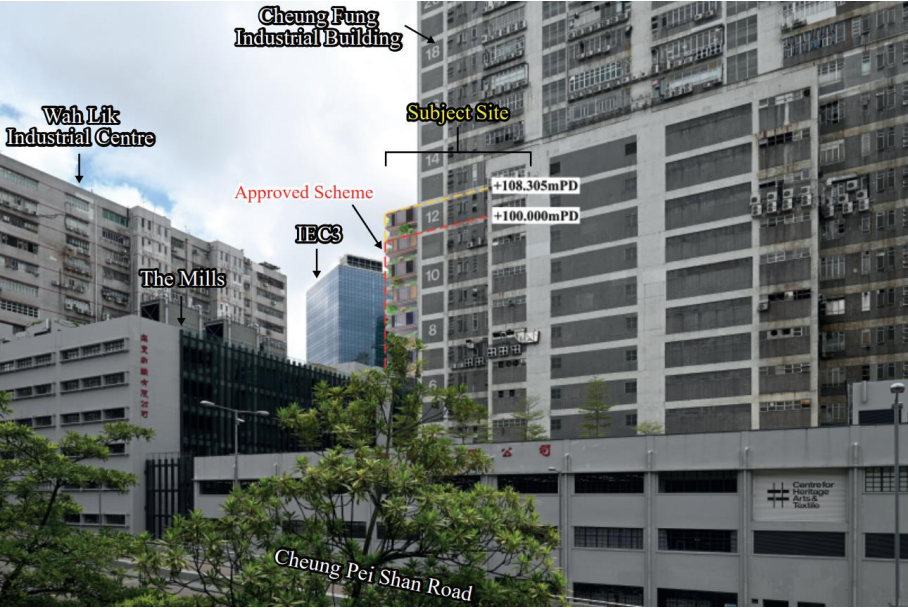
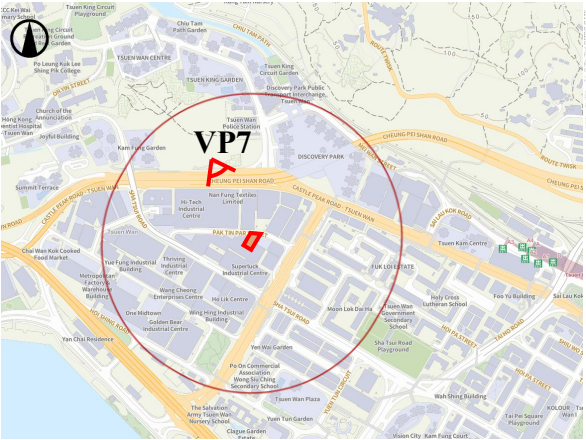
Approved Scheme under Application No. A/TW/529

(Image extracted from VIA of the Application No. A/TW/529)



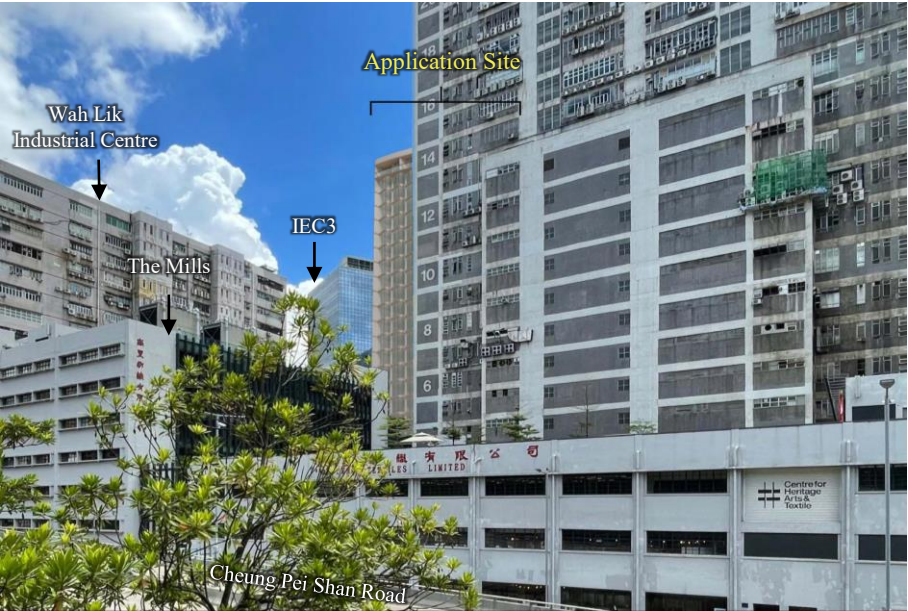
Proposed Development

Figure No. 8	Scale -	Figure Title Viewing Point 6 - On-street loading/unloading area along Pak Tin Par Street
ARUP	Date September 2025	Source Photomontage for illustrative purpose only



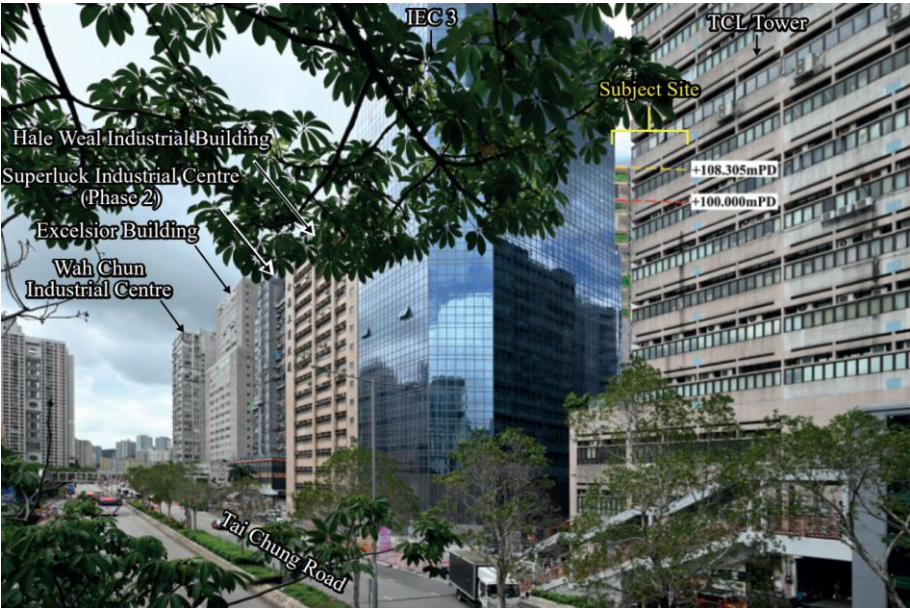
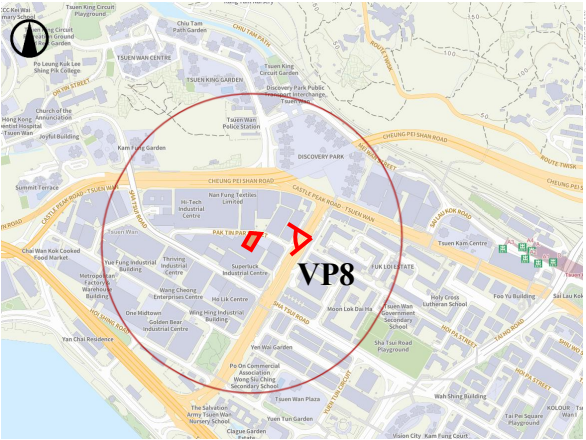
Approved Scheme under Application No. A/TW/529

(Image extracted from VIA of the Application No. A/TW/529)



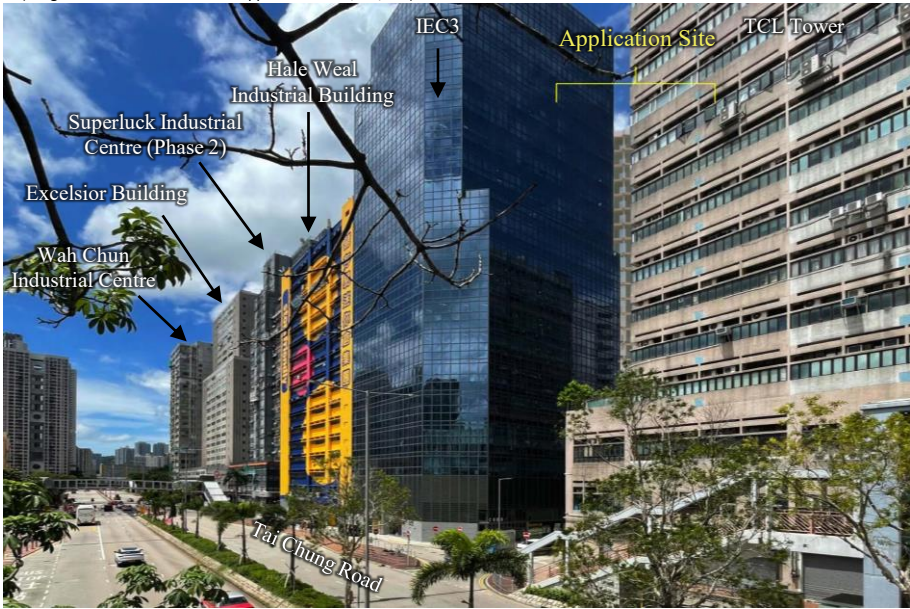
Proposed Development

Figure No.	Scale	Figure Title
9	-	Viewing Point 7 - Pavilion along Cheung Pei Shan Road
ARUP	Date	Source
	September 2025	Photomontage for illustrative purpose only



Approved Scheme under Application No. A/TW/529

(Image extracted from VIA of the Application No. A/TW/529)



Proposed Development

Figure No.	Scale	Figure Title
10	-	Viewing Point 8 - Footbridge across Tai Chung Road near the intersection with Pak Tin Par Street
ARUP	Date	Source
	September 2025	Photomontage for illustrative purpose only