

## **Response-to-Comment to Visual Impact Assessment**

## Comments from UD&amp;L, Planning Department dated 7.1.2026

<b>Comments</b>		<b>Responses</b>
1.	She has no adverse comments on the Visual Impact Assessment (VIA) submitted by the applicant, which concludes that negligible visual impact arising from the proposed development on public viewers is anticipated.	Noted.
2.	The applicant is advised to remove Plans 6, 9, 12, 15 and 18 from the VIA as the 'prospective' plans may contain some confusing information and the photomontages would be adequate for the VIA purpose.	Plans 6, 9, 12, 15 and 18 from the VIA have been removed.

# Visual Impact Assessment Report

for

Rezoning Application from “GB” and “AGR” to “OU (Columbarium)”  
on various Lots in D.D. 41  
and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.

Date: March 2026

## **Table of Content**

- 1. Introduction**
- 2. The Proposal**
- 3. Assessment Area and Viewing Points**
- 4. Visual Impact Assessment**
- 5. Summary and Conclusion**

## **List of Plans**

<b>VIA Plan 1</b>	<b>Assessment Area Plan</b>
<b>VIA Plan 2</b>	<b>Aerial Photo</b>
<b>VIA Plan 3</b>	<b>Master Layout Plan</b>
<b>VIA Plan 4</b>	<b>Location of VP1</b>
<b>VIA Plan 5</b>	<b>VP1 Photomontage</b>
<b>VIA Plan 6</b>	<b>Location of VP2</b>
<b>VIA Plan 7</b>	<b>VP2 Photomontage</b>
<b>VIA Plan 8</b>	<b>Location of VP3</b>
<b>VIA Plan 9</b>	<b>VP3 Photomontage</b>
<b>VIA Plan 10</b>	<b>Location of VP4</b>
<b>VIA Plan 11</b>	<b>VP4 Photomontage</b>
<b>VIA Plan 12</b>	<b>Location of VP5</b>
<b>VIA Plan 13</b>	<b>VP5 Photomontage</b>

## 1. Introduction

- 1.1 The applicant intends to amend the zoning of the site on the Approved Sha Tau Kok Outline Zoning Plan (OZP) No. S/NE-STK/2 from “Green Belt” (“GB”) and “Agriculture” (“AGR”) zones to “Other Specified Uses” annotated “Columbarium” (“OU (Columbarium)”) zone. The new zoning will allow the Applicant to convert the application site into a columbarium facility.
- 1.2 The proposal involves rezoning of the site from non-development use to development use which may result in loss of visual openness on-site or off-site from key public viewing points. A Visual Impact Assessment is thus required to support the proposed rezoning.
- 1.3 The objectives of the Visual Impact Assessment are as follows:
  - To assess the potential visual impact of the proposed development to the surrounding areas;
  - To present sufficient information for visualizing the three-dimensional relationship of the proposed development with the surrounding context;
  - To facilitate the Town Planning Board (TPB) to consider the visual effect in making the decision; and
  - To recommend improvement proposal, if necessary.
- 1.4 The Visual Impact Assessment is prepared based on the Town Planning Board Guidelines on Submission of Visual Impact Assessment for Planning Applications to the Town Planning Board (TPB PG-No. 41).

## 2. The Proposal

2.1 The proposal is a rezoning of the site from “AGR” and “GB” to “OU(Columbarium)” zone in order to allow a columbarium to be operated by a non-profitable Non-Government Organization (NGO).

### 2.2 Application site

The application site is located to the south east of Tong To Village. It is adjacent to the two separated areas under permitted burial ground no. N/K/8.

### 2.3 Site Area

The area of the subject site is about **13,382** m<sup>2</sup> in which about **2,815** m<sup>2</sup> of Government Land is involved.

### 2.4 Proposed Development

The proposed development consists of a columbarium area, a three-storey ancillary service building, a guard room and two ancillary parking facilities. The three-storey ancillary building provides **4** multi-functions rooms, an ancillary office, a storeroom, a canteen, a kitchen and toilets. Two stairhoods each of not more than **8** m<sup>2</sup> in area and **2.5** m in height, a parapet wall of not more than **1.22** m in height and a water tank (dimensions to be approved by the Buildings Department) are proposed on the roof. Ancillary structures on roof are excepted from Gross Floor Area and number of storeys calculation.

Fence walls of about **2.5m** to **4.5m** high are proposed along the boundaries of the columbarium area. **1.5m** high wired mesh fence is proposed along the internal road between Sha Tau Kok Road and Entrance E. A plantation area of about **1.2m** wide is proposed along the boundary of the site when applicable.

A total of **6,495** niches are proposed in the columbarium area. Niches will be placed in the at-grade niche blocks of about 1.1m high. Please refer to the VIA Plan 3 for details.

### 3. Assessment Area and Viewing Points

#### 3.1 Assessment Area

According to para. 4.3 of the TPB PG-No.41, the initial reference in approximating the extent of assessment is three times of the height of a building, i.e. 31.5m from the ancillary buildings in this proposal. There are only four temporary structures in the initial assessment area. No key public viewing point is identified.

#### 3.2 Viewing Points

Considering the unpleasant nature and the large site area of the proposed development, the sensitive viewers in a larger vicinity are included as the key public viewing points. That included viewing points from the nearest villages and the biggest tourist attraction in the area, i.e. Tong To, Tong To Ping Tsuen, Sha Tau Kok Farm and Sha Tau Kok Road. Please refer to the Assessment Area Plan (**VIA Plan 1**) for details.

The proposed development is surrounded by existing woodlands in the north-west, north and north-east sides. The woodlands substantially block the views from these sides. A row of trees at the north side of Sha Tau Kok Road also creates a screening effect for travellers. The public viewing points from these angles may be excluded. Please refer to the Aerial Photo (**VIA Plan 2**) for details.

**5** viewing points are selected to represent the public viewers from the most sensitive areas. The considerations on the selection are stated in **Table 3.1** below.

Table 3.1 – Considerations on selecting viewing points

<b>Viewing Point</b>	<b>Location</b>	<b>Considerations</b>	<b>Visual Sensitivity</b>
VP1	Open Area in Tong To Tsuen	Representing residents of Tong To Tsuen	High
VP2	Open Area in Tong To Ping Tsuen	Representing residents of Tong To Ping Tsuen	High
VP3	East of the site on Sha Tau Kok Road	Representing travellers on Sha Tau Kok Road	Low
VP4	Cross point of Sha Tau Kok Road and a village drain	Representing travellers on Sha Tau Kok Road; no road side trees at this location	Low
VP5	The junction of the open storage sites nearby	Representing the employees of the open storage sites nearby	Low

## 4. Visual Impact Assessment

4.1 The visual elements from the viewing points before and after the completion of the proposed development are stated in the tables below.

Table 4.1 – Visual elements of the viewing points in existing situation

Viewing Points	Visual Elements		
	Major Physical Structures	Visual Resources	Visual Eyesores
VP1	None	Woodland; Mountain backdrop	Electricity pole and pylon
VP2	None	Woodland	None
VP3	None	Woodland; Mountain backdrop	None
VP4	2-storey rural structure with fencing	Woodland Mountain backdrop	None
VP5	Graveyard	Graveyard; Woodland; Mountain backdrop	Existing Graveyard

Table 4.2 – Visual Elements of the viewing points after the completion of the proposed development

Viewing Points	Visual Elements		
	Major Physical Structures	Visual Resources	Visual Eyesores
VP1	None	Woodland; Mountain backdrop	Electricity pole and pylon
VP2	None	Woodland	None
VP3	None	Woodland; Mountain backdrop	None
VP4	2-storey rural structure with fencing	Woodland and Mountain as backdrop	None
VP5	None	Graveyard; Woodland; Mountain backdrop	Existing Graveyard

4.2 The appraisals of visual changes are stated in the below table.

<b>Viewing Points</b>	<b>Visual Composition</b>	<b>Visual Obstruction</b>	<b>Effect on Public Viewers</b>	<b>Effect on Visual Resources</b>	<b>Visual Impact</b>
VP1	No change from existing site composition. The rows of existing trees are compatible with the existing environment. The proposed development is blocked by the trees and cannot be seen from this VP.	There is no loss of views nor blockage of the mountain backdrop.	Negligible. The sightline to the proposed development is blocked by existing trees.	There is no change to the condition, quality and character of the assessment area. In addition, trees are planted along the boundary to provide additional screening.	Negligible
VP2	No change from existing site composition. The groups of existing trees are compatible with the existing environment. The proposed development is blocked by the trees and cannot be seen from this VP.	There is no loss of views.	Negligible. The sightline to the proposed development is blocked by existing trees.	There is no change to the condition, quality and character of the assessment area. In addition, trees are planted along the boundary to provide additional screening.	Negligible
VP3	No change from existing site composition. The rows of existing trees are compatible with the existing environment. The proposed development is blocked by the trees and cannot be seen from this VP.	There is no loss of views nor blockage of the mountain backdrop.	Negligible. The sightline to the proposed development is blocked by existing trees.	There is no change to the condition, quality and character of the assessment area. In addition, trees are planted along the boundary to provide additional screening.	Negligible
VP4	No change from existing site composition. The groups of existing trees are compatible with the existing environment. The proposed development is blocked by the trees and cannot be seen from this VP.	There is no loss of views nor blockage of the mountain backdrop.	Negligible. The sightline to the proposed development is blocked by existing trees.	There is no change to the condition, quality and character of the assessment area. In addition, trees are planted along the boundary to provide additional screening.	Negligible
VP5	No change from existing site composition. The groups of existing trees are compatible with the existing environment. The proposed development is blocked by the trees and cannot be seen from this VP.	There is no loss of views nor blockage of the mountain backdrop.	Negligible. The sightline to the proposed development is blocked by existing trees.	There is no change to the condition, quality and character of the assessment area. In addition, trees are planted along the boundary to provide additional screening.	Negligible

## **5. Summary and Conclusion**

### **5.1 Summary**

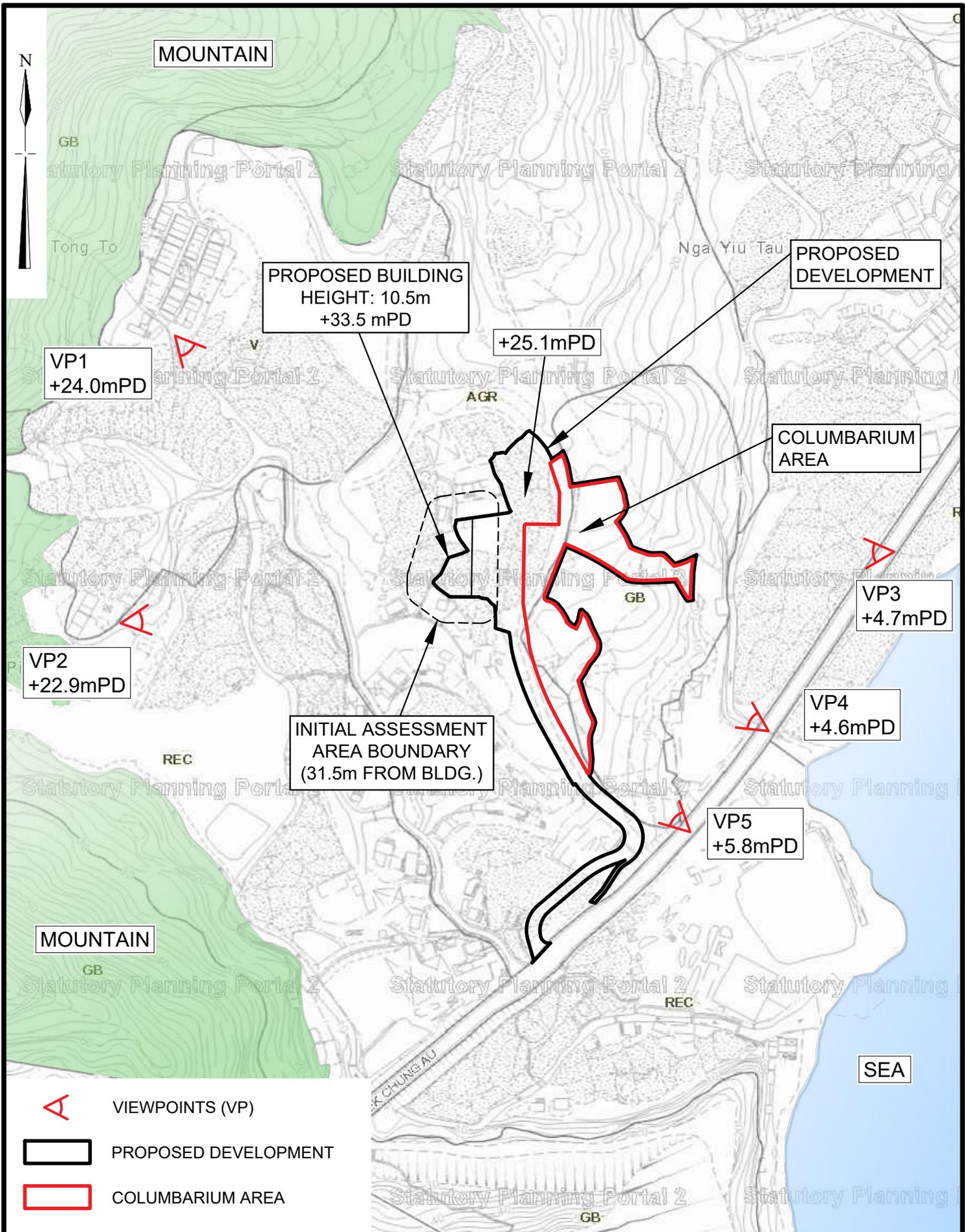
From the above, the visual impact of the proposed development from the **5** viewing points are assessed. All of them are negligible in terms of the visual impact.

Due to level differences and the screening effect from the existing woodlands, the sightlines of the proposed development from the **5** viewpoints are blocked.

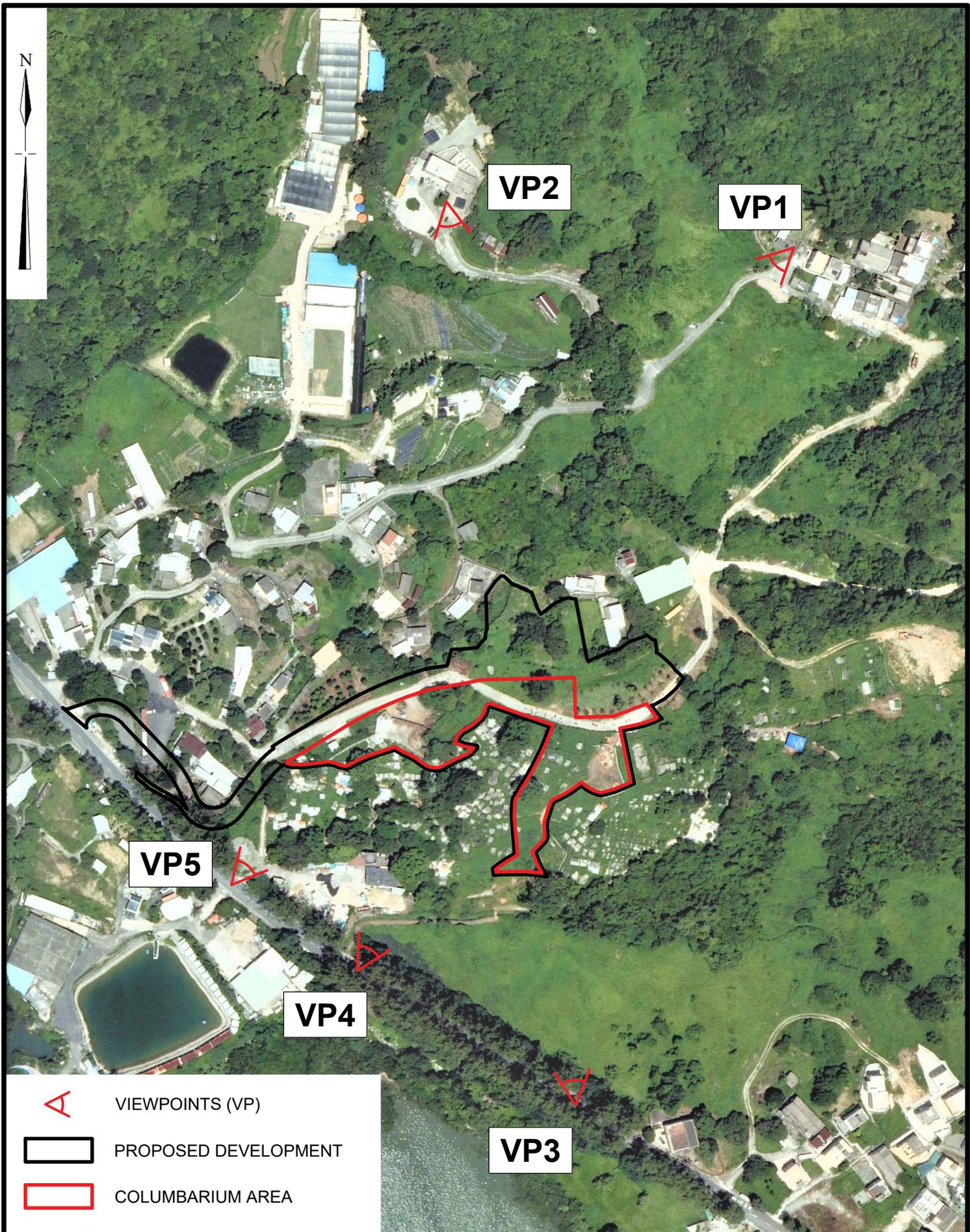
The proposed three-storey ancillary building is compatible with the surrounding rural setting. Its' sightline is also blocked by the existing groups of trees. The proposed trees and the landscape area provide screening effect to the proposed development.

### **5.2 Conclusion**

The proposed development will have insignificant effect on public viewers and visual resources. The overall visual impact of the proposed development is negligible.



<p>Not to scale</p>	<p><b>Assessment Area Plan</b></p>	<p><b>Goldrich Planners &amp; Surveyors Ltd.</b></p>
<p><b>October 2025</b></p>	<p>Rezoning Application from "AGR" and "GB" to "OU (Columbarium)" on various Lots in D. D. 41 and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.</p>	<p><b>VIA Plan 1 (P 17106)</b></p>



 VIEWPOINTS (VP)  
 PROPOSED DEVELOPMENT  
 COLUMBARIUM AREA

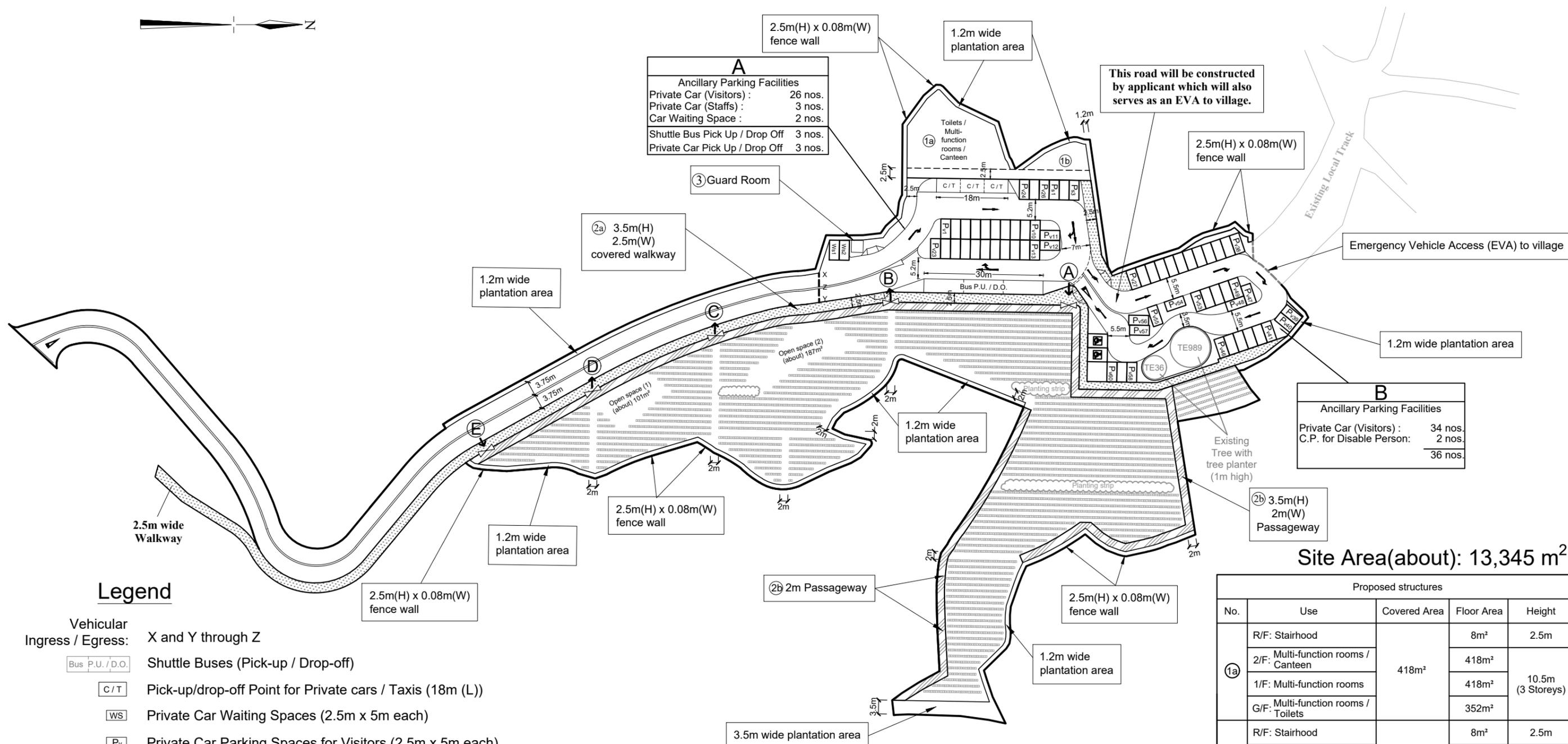
Not to scale

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October 2025

**Aerial Photo**  
 Rezoning Application from "AGR" and "GB" to "OU (Columbarium)"  
 on various Lots in D. D. 41  
 and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.

**Goldrich Planners & Surveyors Ltd.**  
**VIA Plan 2**  
**( P 17106 )**



**A**  
Ancillary Parking Facilities

Private Car (Visitors) :	26 nos.
Private Car (Staffs) :	3 nos.
Car Waiting Space :	2 nos.
Shuttle Bus Pick Up / Drop Off :	3 nos.
Private Car Pick Up / Drop Off :	3 nos.

**B**  
Ancillary Parking Facilities

Private Car (Visitors) :	34 nos.
C.P. for Disable Person :	2 nos.
<b>Total</b>	<b>36 nos.</b>

Ancillary Parking Facilities

	Private Car Parking Spaces for Visitors	Private Car Parking Spaces for Visitors (Disabled Persons)	Total Private Car Parking Space for Visitors	Private Car Parking Spaces for staffs	Private Car Waiting Spaces	Pick-up/drop-off Point for Private cars / Taxis	Lay-by for Shuttle Buses
Car park A	26	-	62	3	2	3	3
Car park B	34	2		-	-	-	-
<b>Total</b>	<b>60</b>	<b>2</b>		<b>3</b>	<b>2</b>	<b>3</b>	<b>3</b>

Niche count

	No. of niches
At-grade niche blocks	6,495 nos. x 1 = 6,495

Site Area(about): 13,345 m<sup>2</sup>

Proposed structures

No.	Use	Covered Area	Floor Area	Height
1a	R/F: Stairhood	418m <sup>2</sup>	8m <sup>2</sup>	2.5m
	2/F: Multi-function rooms / Canteen		418m <sup>2</sup>	10.5m (3 Storeys)
	1/F: Multi-function rooms		418m <sup>2</sup>	
	G/F: Multi-function rooms / Toilets		352m <sup>2</sup>	
1b	R/F: Stairhood	128m <sup>2</sup>	8m <sup>2</sup>	2.5m
	2/F: Kitchen		128m <sup>2</sup>	10.5m (3 Storeys)
	1/F: Multi-function rooms		128m <sup>2</sup>	
	G/F: Office / Storeroom		78m <sup>2</sup>	
2a	Canopy over walk-way	832m <sup>2</sup>	832m <sup>2</sup>	3.5m (1 Storey)
2b	Canopy over passageway	748m <sup>2</sup>	748m <sup>2</sup>	3.5m (1 Storey)
3	1/F: Guard room	9m <sup>2</sup>	9m <sup>2</sup>	6m (2 Storeys)
	G/F: Guard room		9m <sup>2</sup>	
<b>Total</b>		<b>2,135m<sup>2</sup></b>	<b>3,136m<sup>2</sup></b>	

**Legend**

- Vehicular Ingress / Egress: X and Y through Z
- Bus P.U. / D.O. Shuttle Buses (Pick-up / Drop-off)
- C/T Pick-up/drop-off Point for Private cars / Taxis (18m (L))
- WS Private Car Waiting Spaces (2.5m x 5m each)
- Pv Private Car Parking Spaces for Visitors (2.5m x 5m each)
- Ps Private Car Parking Spaces for Staffs (2.5m x 5m each)
- Private Car Parking Spaces for Visitors (Disabled Persons) (3.5m x 5m each)
- Pedestrian access
- Canopy over walk-way
- Canopy over passageway
- Planting Strip

1 : 1000 (A3)

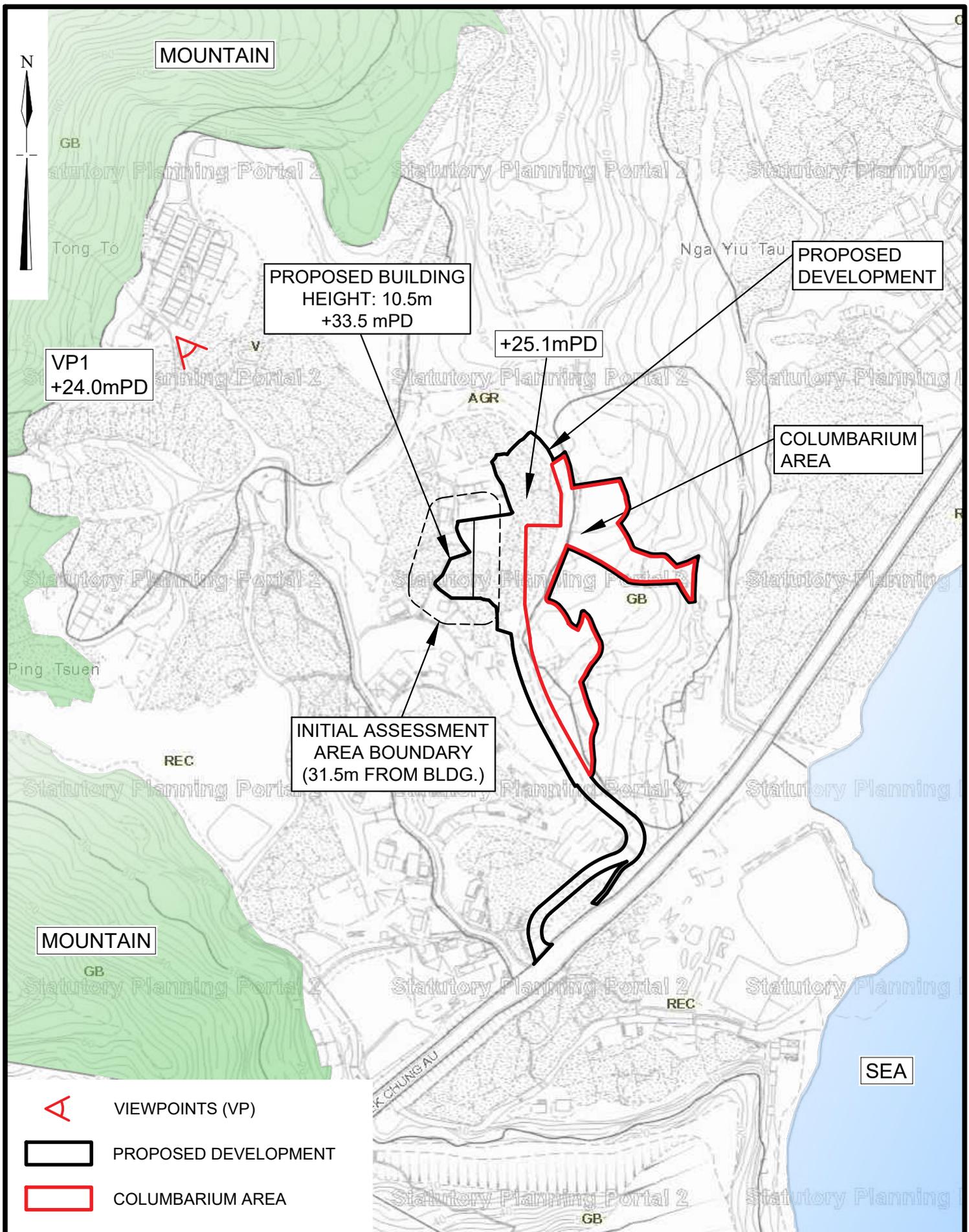
October 2025

**Master Layout Plan**

Rezoning Application from "AGR" and "GB" to "OU (Columbarium)" on various Lots in D. D. 41 and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.

**Goldrich Planners & Surveyors Ltd.**

**VIA Plan 3 (P 17106)**



VIEWPOINTS (VP)



PROPOSED DEVELOPMENT



COLUMBARIUM AREA

Not to scale

### Location of VP 1

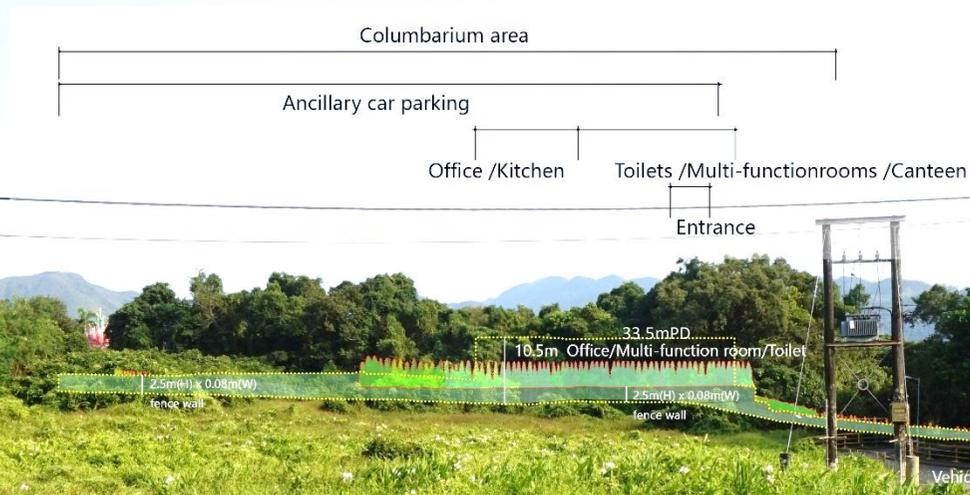
**Goldrich Planners & Surveyors Ltd.**

**October 2025**

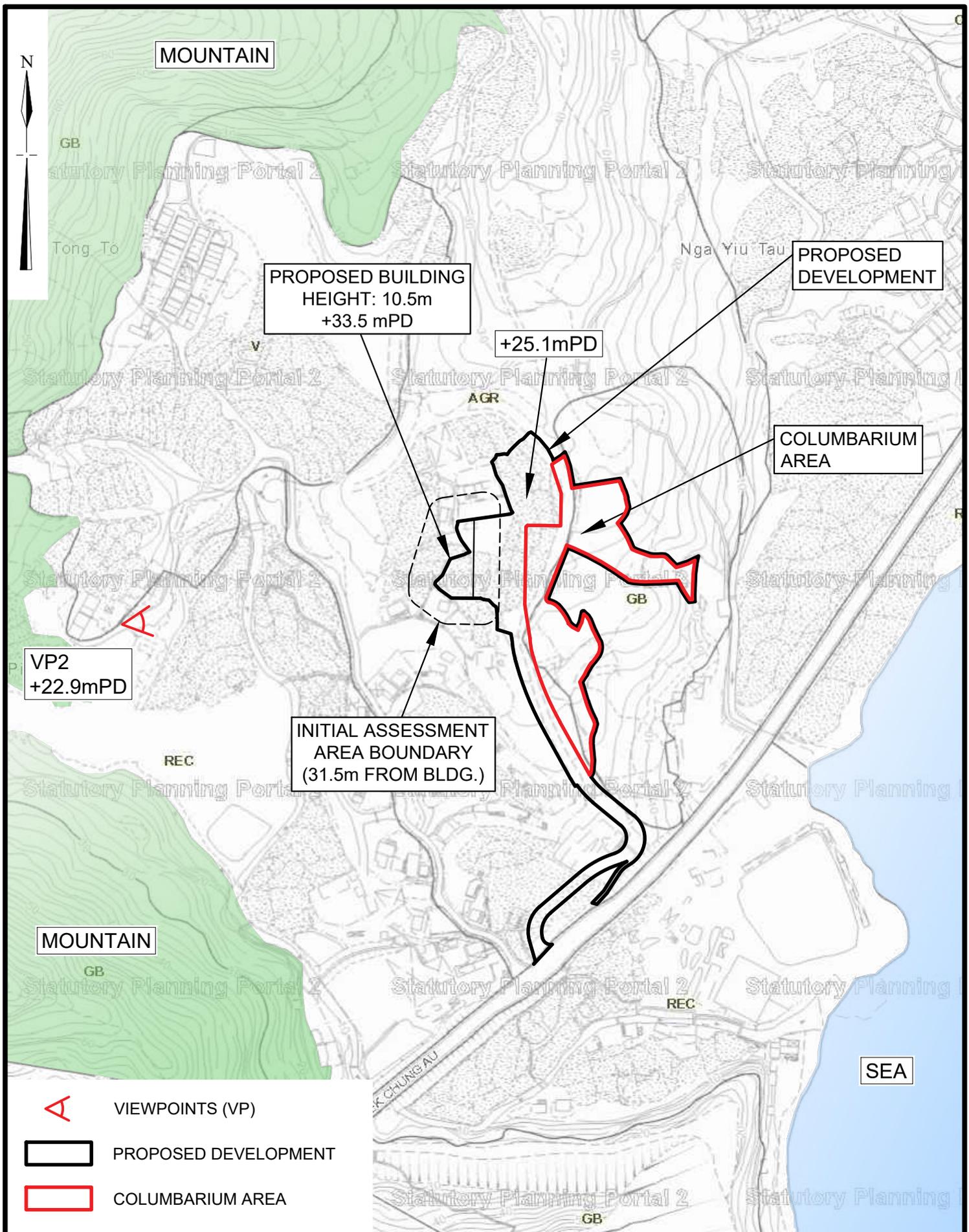
Rezoning Application from "AGR" and "GB" to "OU (Columbarium)"  
on various Lots in D. D. 41  
and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.

**VIA Plan 4  
(P 17106)**

# VP1 Photomontage

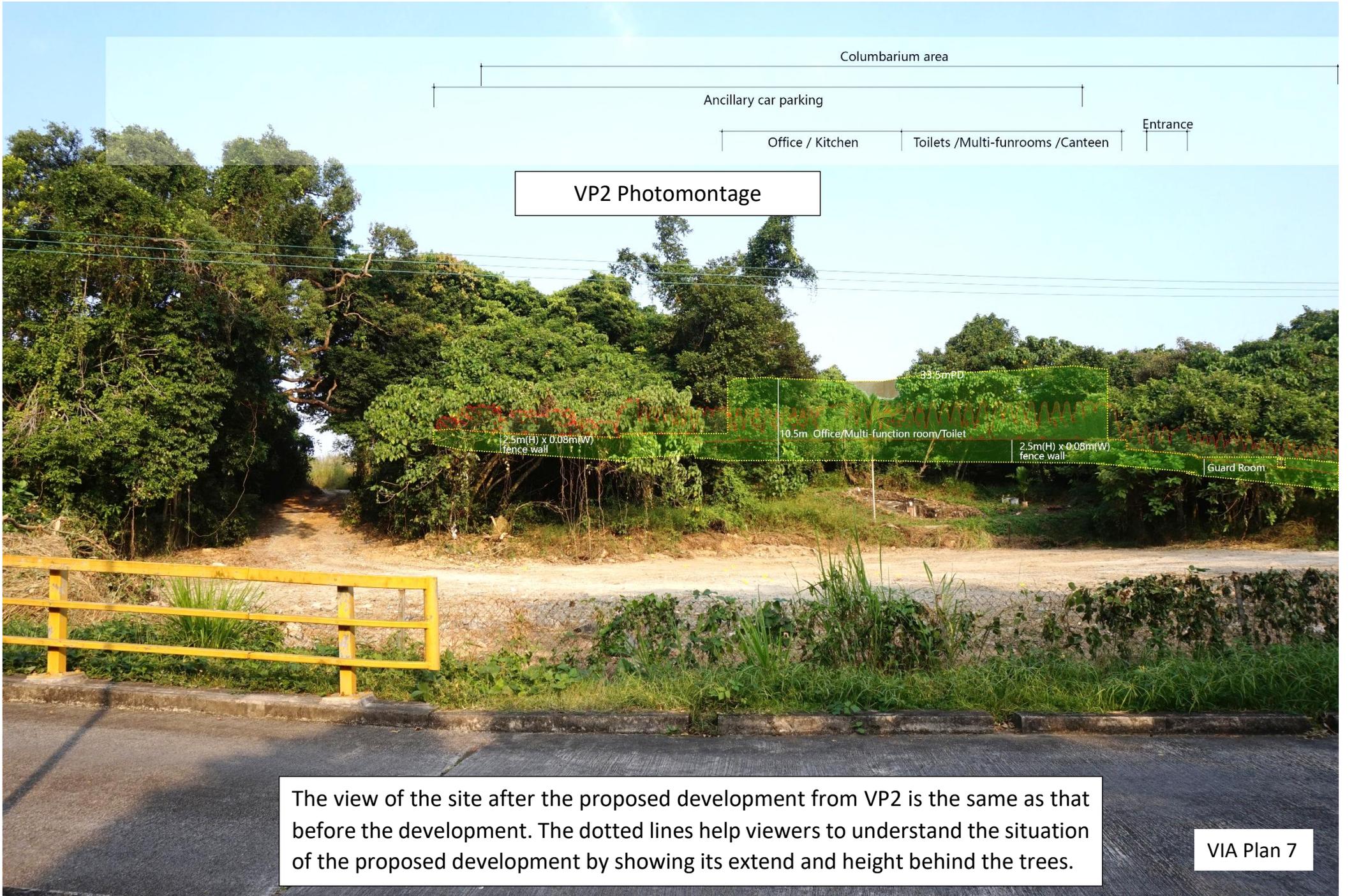


The view of the site after the proposed development from VP1 is the same as that before the development. The dotted lines help viewers to understand the situation of the proposed development by showing its extend and height behind the trees.



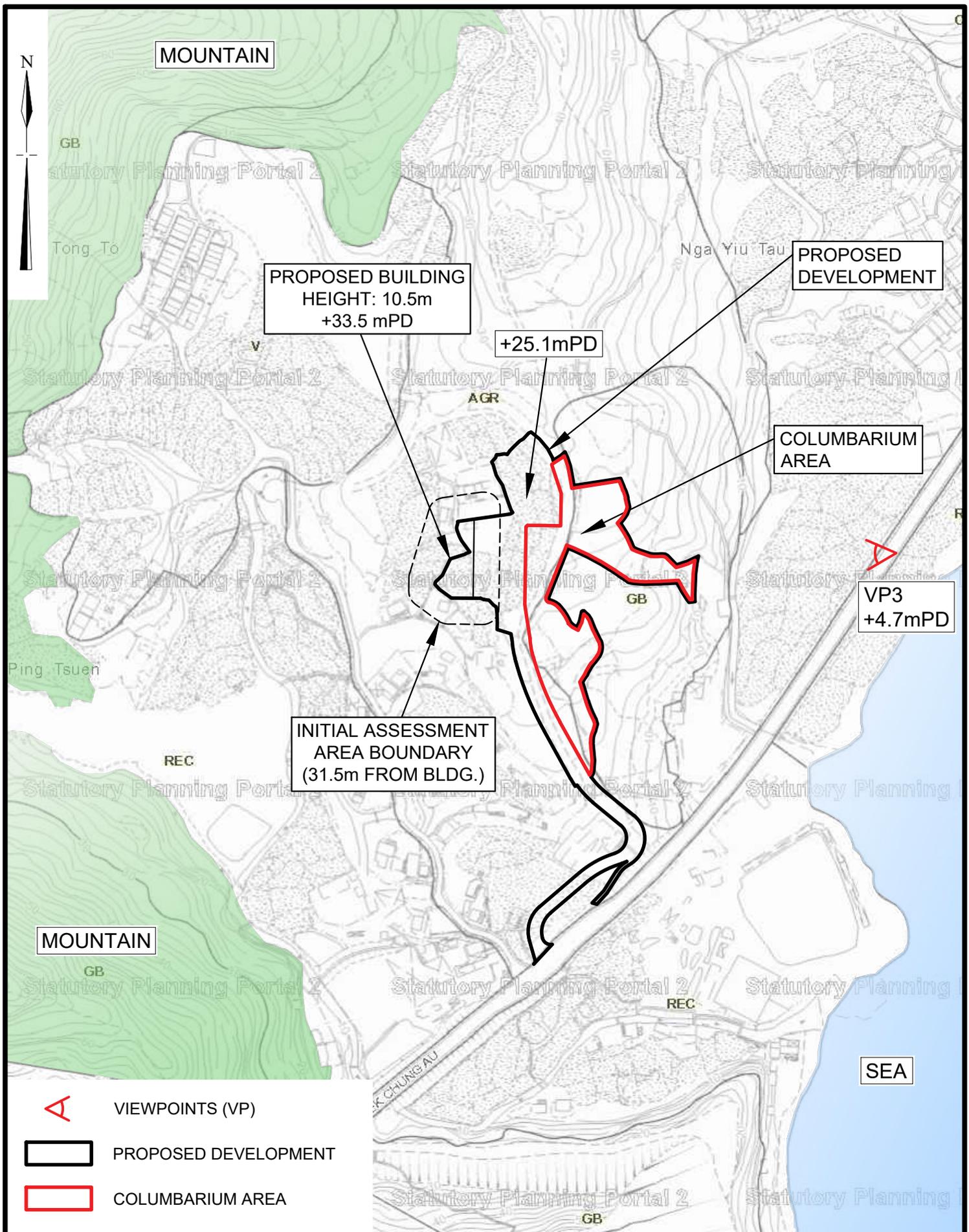
-  VIEWPOINTS (VP)
-  PROPOSED DEVELOPMENT
-  COLUMBARIUM AREA

<p>Not to scale</p>	<p>Location of VP 2</p>	<p>Goldrich Planners &amp; Surveyors Ltd.</p>
<p>October 2025</p>	<p>Rezoning Application from "AGR" and "GB" to "OU (Columbarium)" on various Lots in D. D. 41 and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.</p>	<p>VIA Plan 6 (P 17106)</p>



VP2 Photomontage

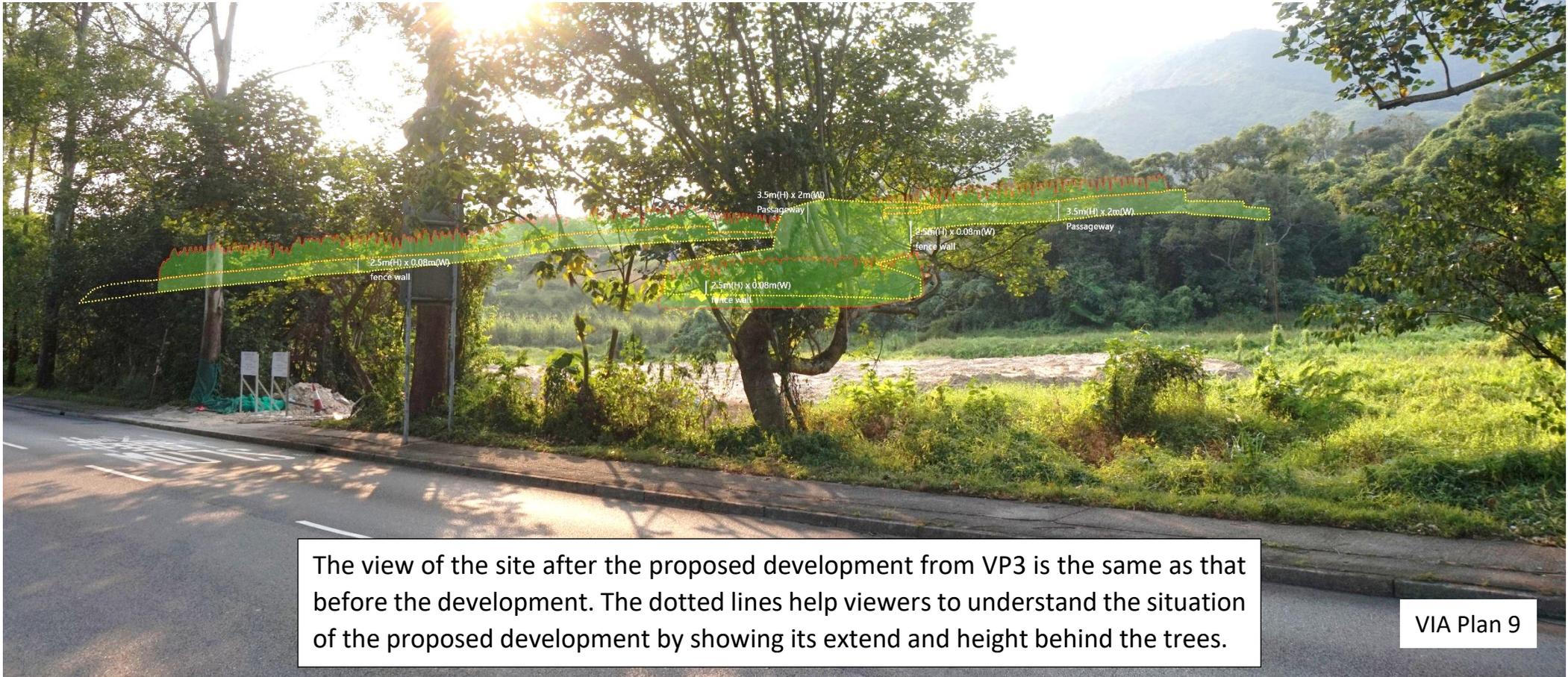
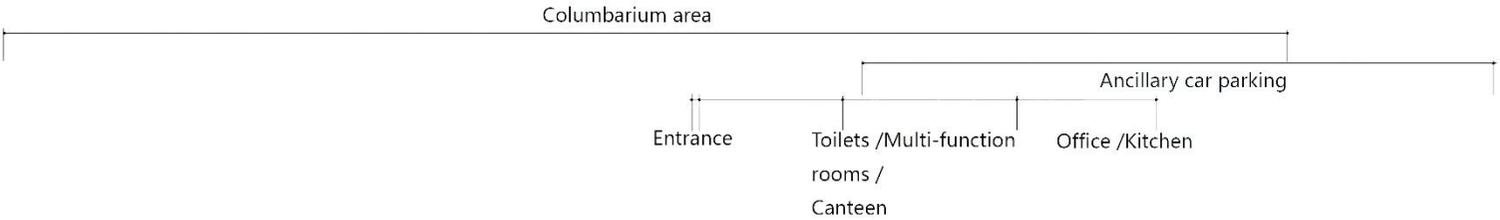
The view of the site after the proposed development from VP2 is the same as that before the development. The dotted lines help viewers to understand the situation of the proposed development by showing its extend and height behind the trees.



-  VIEWPOINTS (VP)
-  PROPOSED DEVELOPMENT
-  COLUMBARIUM AREA

<b>Not to scale</b>	<b>Location of VP 3</b>	<b>Goldrich Planners &amp; Surveyors Ltd.</b>
<b>October 2025</b>	Rezoning Application from "AGR" and "GB" to "OU (Columbarium)" on various Lots in D. D. 41 and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.	<b>VIA Plan 8 (P 17106)</b>

# VP3 Photomontage





# VP4 Photomontage

Columbarium area

Ancillary car parking

Entrance

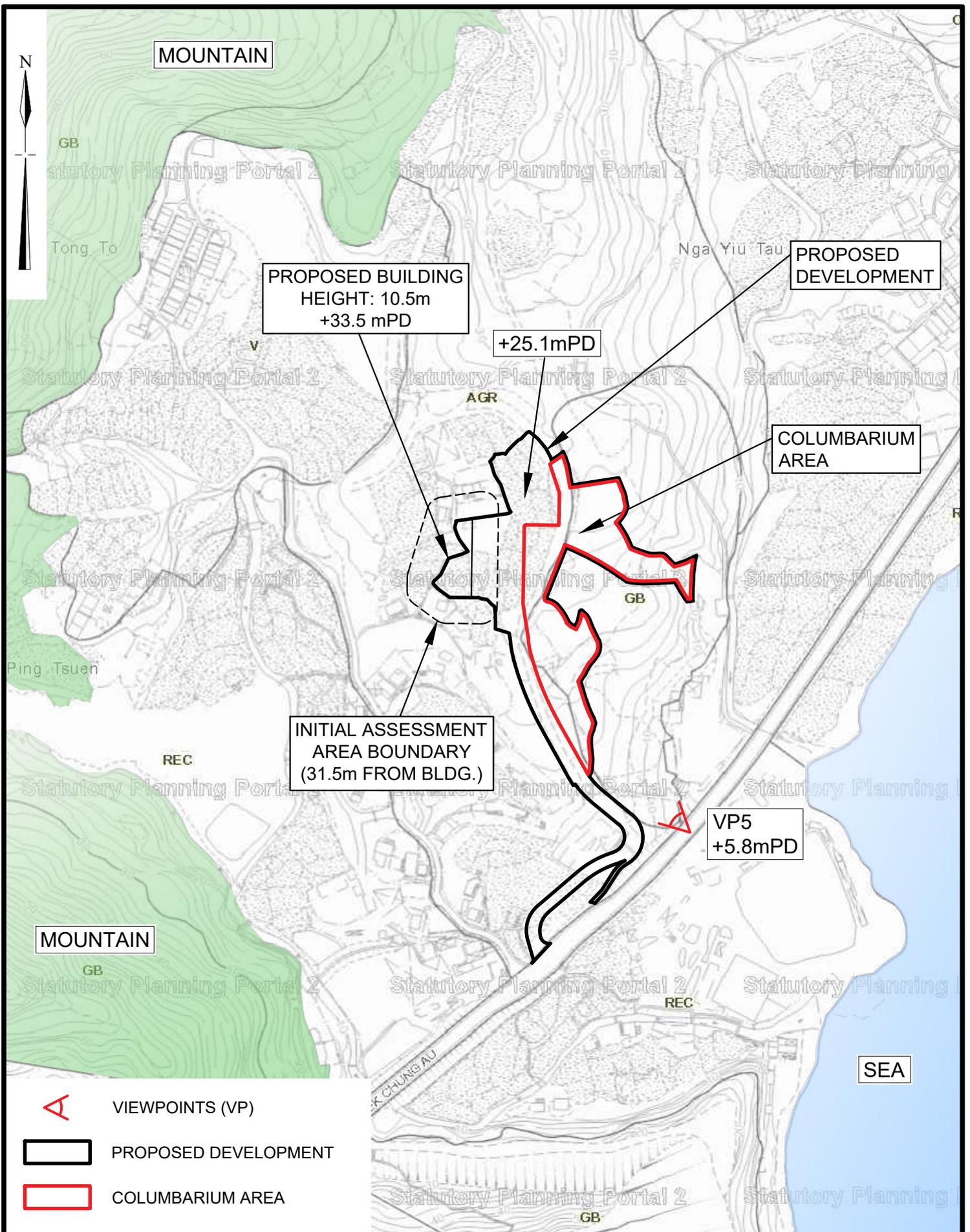
Toilets  
/Multi-funrooms  
/Canteen

Office /  
Kitchen

2.5m(H) x 0.08m(W)  
fence wall

2.5m(H) x 0.08m(W)  
fence wall

The view of the site after the proposed development from VP4 is the same as that before the development. The dotted lines help viewers to understand the situation of the proposed development by showing its extend and height behind the trees.

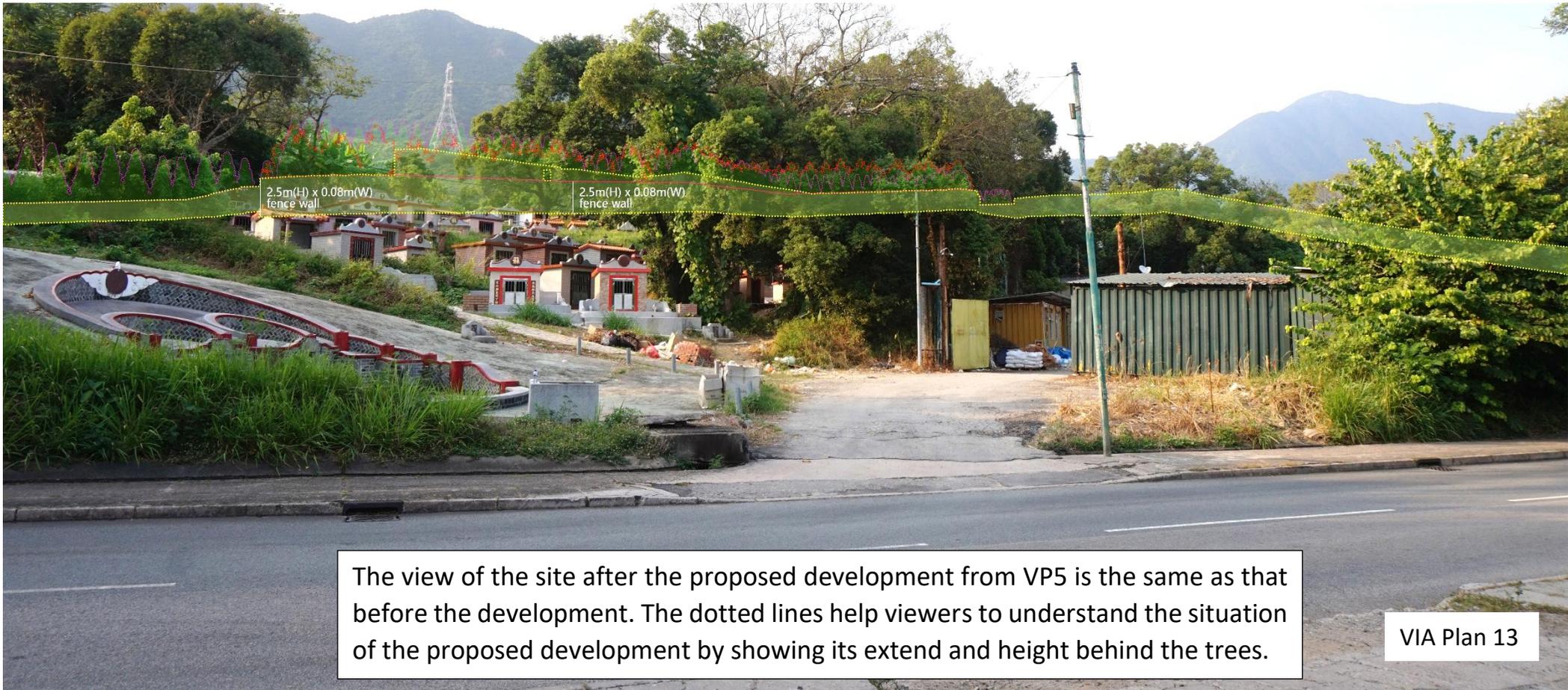
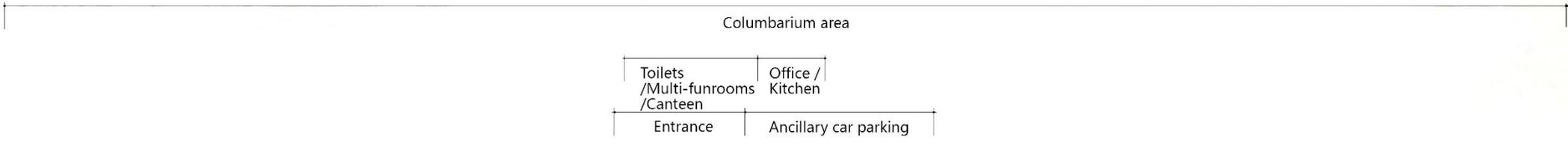


-  VIEWPOINTS (VP)
-  PROPOSED DEVELOPMENT
-  COLUMBARIUM AREA

<b>Not to scale</b>	<b>Location of VP 5</b>	<b>Goldrich Planners &amp; Surveyors Ltd.</b>
<b>October 2025</b>	Rezoning Application from "AGR" and "GB" to "OU (Columbarium)" on various Lots in D. D. 41 and Adjoining Government Land, Tong To, Sha Tau Kok, N.T.	<b>VIA Plan 12 (P 17106)</b>



VP5 Photomontage



The view of the site after the proposed development from VP5 is the same as that before the development. The dotted lines help viewers to understand the situation of the proposed development by showing its extend and height behind the trees.