

Appendix 4

Visual Impact Assessment

**S12A AMENDMENT OF PLAN APPLICATION
APPROVED KAM TIN NORTH OZP NO. S/YL-KTN/11**

Rezoning from “Residential (Group C) 2” and “Open Space” zones to “Residential (Group C) 4” zone for a Proposed Residential Development at Lot Nos. 519 RP (part) and 520 RP in D.D. 110 and the Adjoining Government land, Shek Kong, Yuen Long, N.T.

VISUAL IMPACT ASSESSMENT

October 2025

Applicants:

Kimpton Investments Limited
Pacific Top Development Limited
Worldchamp Investments Limited

Prepared by:

KTA Planning Limited



PLANNING LIMITED
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Rezoning from “Residential (Group C) 2” and “Open Space” zones to “Residential (Group C) 4” zone for a Proposed Residential Development at Lot Nos. 519 RP (part) and 520 RP in D.D. 110 and adjoining Government land, Shek Kong, Yuen Long, N.T.

Visual Impact Assessment

1. INTRODUCTION

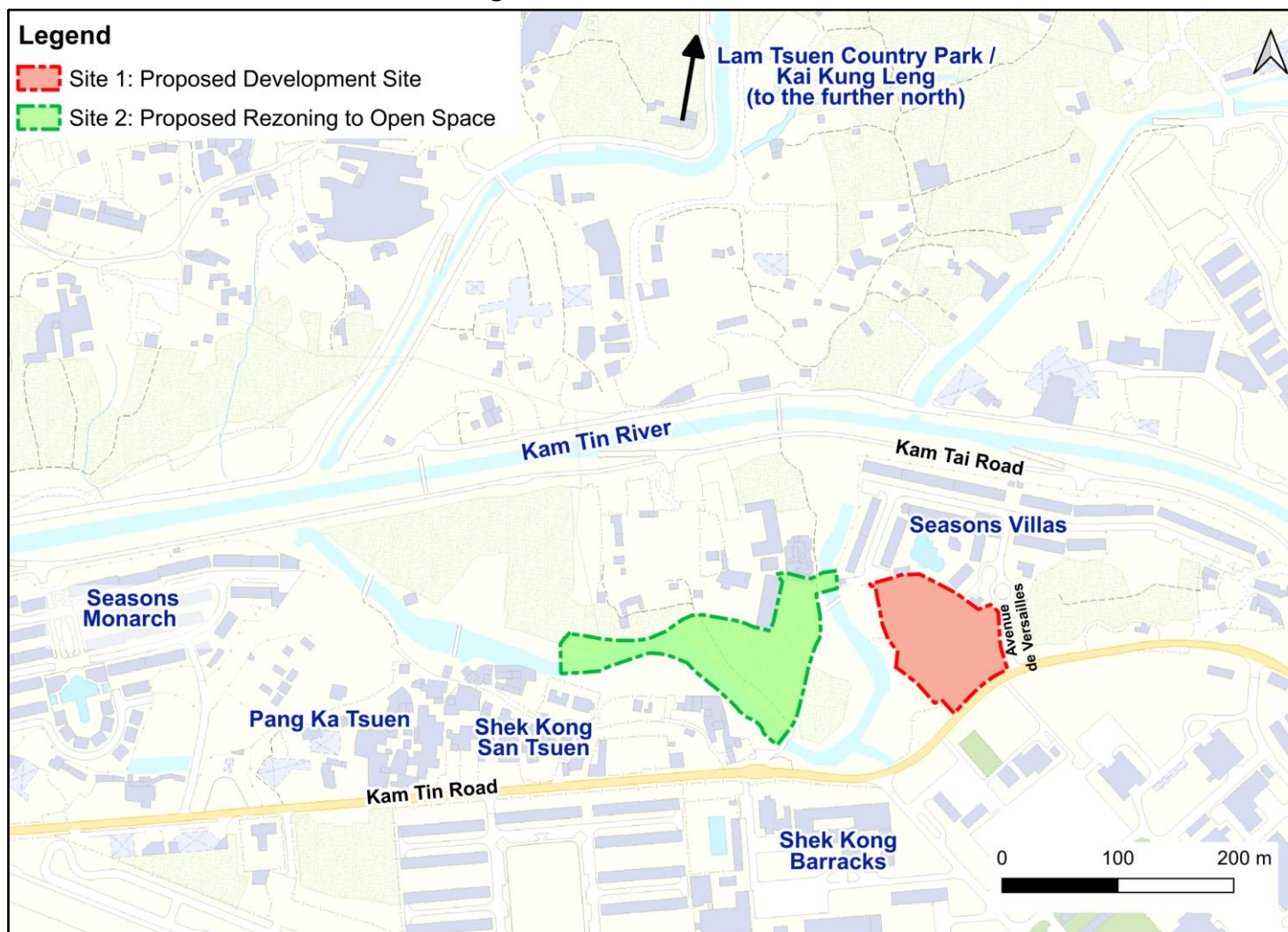
1.1 Purpose

- 1.1.1 This Amendment of Plan Application is prepared and submitted on behalf of Kimpton Investments Limited, Pacific Top Development Limited and Worldchamp Investments Limited (the “Applicants”) to seek approval from the Town Planning Board (“TPB”/the “Board”) under section 12A of the Town Planning Ordinance for (1) rezoning of an area from “Residential (Group C) 2” (“R(C)2”) and “Open Space” (“O”) to “Residential (Group C) 4” (“R(C)4”) under the approved Kam Tin North Outline Zoning Plan (“OZP”) No. S/YL-KTN/11, to enable the proposed residential development (“Proposed Development”) at Lot Nos. 519 RP (part) and 520 RP in D.D. 110 and adjoining Government land, Kam Tin Road, Shek Kong, Yuen Long (“Site 1” / “Development Site”); and (2) rezoning of an area from “R(C)2” to “O” under the approved OZP at Lot Nos. 121, 137, 138 and 139 (part) in D.D. 110 and adjoining Government land, Kam Tin Road, Shek Kong, Yuen Long (“Site 2”) (**Figure 1.1** refers). “Site 1” and “Site 2” altogether form the Application Site.
- 1.1.2 This Visual Impact Assessment (“VIA”) is mainly to assess the visual impact due to proposed residential development at Site 1 only, in support of the S.12A Amendment of Plan Application. Site 2 is proposed to allow for the provision of public open space use, which will be implemented by the Government.

1.2 Report Structure

- 1.2.1 This VIA evaluates, in accordance with the “Town Planning Board Guidelines on Submission of Visual Impact Assessment for Planning Applications to TPB” (“TPB PG-NO.41”), the anticipated visual impacts of the Proposed Development on public viewers relevant to the Development Site and concludes with recommendation on mitigation measures, if necessary.
- 1.2.2 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 Master Layout Plan (“MLP”) and discussion on the design merits. Visual envelope, visually sensitive receivers 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 Visual Impact Assessment.

Figure 1.1 Site Location Plan



2. METHODOLOGY

2.1 Visual Impact Assessment Approach

- 2.1.1 This VIA aims at evaluating the visual impact of the Proposed Development at Site 1 only, with a maximum building height (“BH”) at 6 storeys, (at max. +28.9mPD under the indicative Master Layout Plan (MLP)) on public visually sensitive receivers (“VSRs”).
- 2.1.2 According to TPB PG-No. 41, 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/VSRs is determined taking into account the activity of the VSR, the duration and distance over which the Proposed Development would remain visual, and the public perception of the value attached to the view being assessed. It is typically qualitatively graded from high to 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** to key public viewing points;
 - the visual **Effect on Public Viewers/VSRs**; and
 - the **Effect on Visual Resources**.
- 2.1.5 The magnitude of visual changes will be qualitative 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 MLP for the Proposed Development at the Development 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") will be identified to represent the view from public VSRs will be identified.

- Each VP and potential visual impact of the Proposed Development on the VSRs will be analysed based on the photomontages prepared from the selected VPs.
- The overall visual impact will be assessed and conclusion on the visual acceptability of the Proposed Development will be made.

3. BASELINE REVIEW

3.1 Site Location and Surrounding Land Use Pattern

3.1.1 The Development Site (Site 1), with a total site area of approximately 8,580m², is located in Kam Tin North. The Site abuts Kam Tin Road to its immediate south and Kam Tai Road is located to its further north. Two low-rise, low-density residential developments in the same “R(C)2” zone, namely Seasons Villas and Seasons Monarch, are located to the immediate north-east and further west. Rural settlements including Shek Kong San Tsuen and Pang Ka Tsuen are located to the west of the Site. The areas to the immediate southwest of Site 1 is an open storage site. Shek Kong Barracks is located to the south of the Site across Kam Tin Road (**Figure 1.1** refers).

3.1.2 Site 1 sits on a gently sloping land with gradient gradually descending from the southeast at about +13.50mPD towards the northwest at about +8.10mPD in general. Site 1 is currently sparsely vegetated (**Figure 3.1** refers).

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. Site 1 is located in a sub-urban setting with predominantly low-lying flat land in its immediate surroundings. Site 1 is primarily intermingled with clusters of low-rise, low density residential developments, village houses, temporary structures, vehicle recycling workshops and vacant land in the adjacent areas at the foothill of Lam Tsuen Country Park.

3.2.2 Key visual elements in the surrounding context of Site 1 are included in **Figure 3.2** and summarised below:

Positive attributes

- In a wider context, Site 1 lies at the bottom of a valley surrounded by slopes of the summit of Kai Kung Leng, Lam Tsuen Country Park to the further north. The mountain ranges provide extensive green backdrop, which contributes to the visual openness of the Site.
- To the further north, there are predominantly low-rise settlements in Cheung Kong Tsuen, Tai Kong Po and Tsat Sing Kong at the foothill of Kai Kung Leng. These low-rise settlements enhance visual permeability and visual transition between the Development Site and the mountain range of Kai Kung Leng to the north.

- To the west of Site 1 where Site 2 is situated, the area is mainly occupied by vegetation, abandoned farmland and watercourse. Upon approval for rezoning Site 2 to “Open Space” zone, this area would offer a more coherent open space as visual relief.
- There are low-rise and low-density residential developments, namely Seasons Villas and Seasons Monarch, located to the immediate northeast and further west of Site 1, which offer visual linkages to the existing residential neighbourhood.
- Low-rise domestic settlements in Shek Kong San Tsuen and Pang Ka Tsuen to the west of Site 1 offer visual relief in the vicinity.
- Kam Tin River, which runs in parallel to Kam Tai Road and Kam Tin Road, serves as the major visual vista to offer visual linkage nearby.

Negative attributes

- Kam Tin Road to the south that the proposed vehicular access of Site 1 immediately abuts is a heavily trafficked road in the local offering limited visual interest to the Site.
- The existing open storage site of vehicle components at the immediately southwest sits on a piece of paved land, which provides little visual interest.
- Shek Kong Barracks are located to the south across Kam Tin Road. There are blocks of building heights ranging from about +15mPD to +39mPD, which offer limited visual interest of the southward view.
- Some land parcels in Kam Tin South located to the further southwest have been reserved for various residential developments (with rezoning for most of them yet to be initiated) with plot ratio ranging from 0.8 to 3 under Government’s Land Use Review (LUR) for Kam Tin South and Pat Heung (**Table 3.1** and **Figure 3.3** refer).
- The existing Kam Sheung Road Station (KSRS) and Pat Heung Maintenance Centre (PHMC) located about 1.5km and 2km south-west of the Site respectively have been planned for high-rise residential/commercial developments with maximum building heights range from +69mPD to +109mPD (**Table 3.2** and **Figure 3.3** refer).

3.2.3 The existing visual quality of Site 1 can be regarded as fair to good. The Site is situated in a predominantly sub-urban area with low-rise domestic settlements and institutional developments, with planned high-rise developments near KSRS. Extensive green backdrop formed by a continuous

mountain range offering visual openness to its further north in a wider context. However, the tall building cluster in Shek Kong Barracks, the existing open storage site and temporary structures to the south-east of the Site as well as the heavily trafficked Kam Tin Road to the immediate south may degrade the visual quality of the immediate surroundings.

- 3.2.4 The existing KSRS and PHMC located in Kam Tin South to the further south-west of Site with planned high-rise residential/commercial development would become key visual elements in the surrounding area. The planned residential developments (with plot ratio ranging from 0.8 to 3) to the further south-west of the Site would alter the suburban townscape of Kam Tin area.



Existing View of Site 1 from Kam Tin Road



Existing vegetation at Site 1



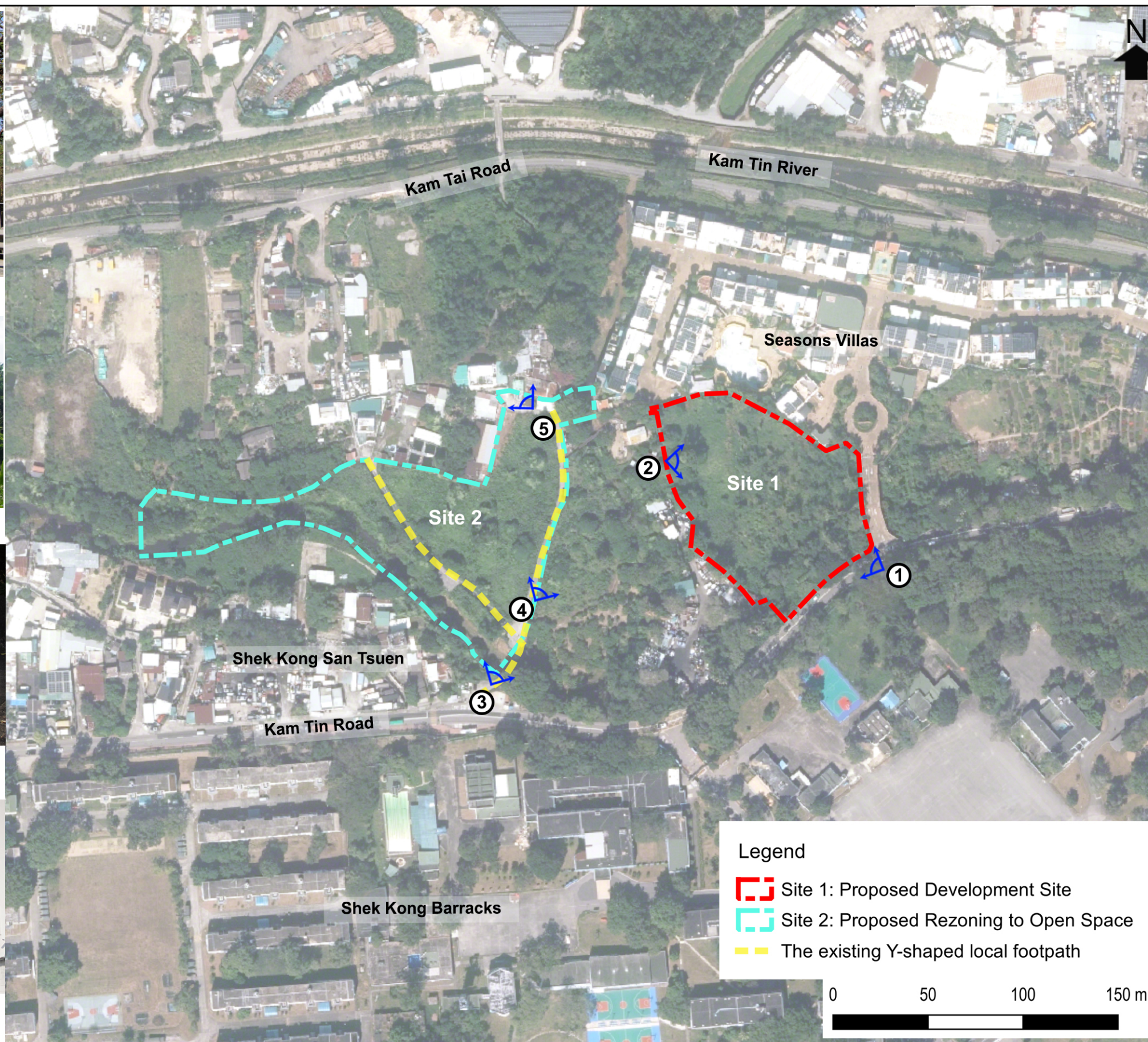
Existing entrance of local access in Site 2 connecting the local village / rural settlements with Kam Tin Road



Existing Y-shaped local footpath in Site 2



Domestic rural settlements to the north of Site 2



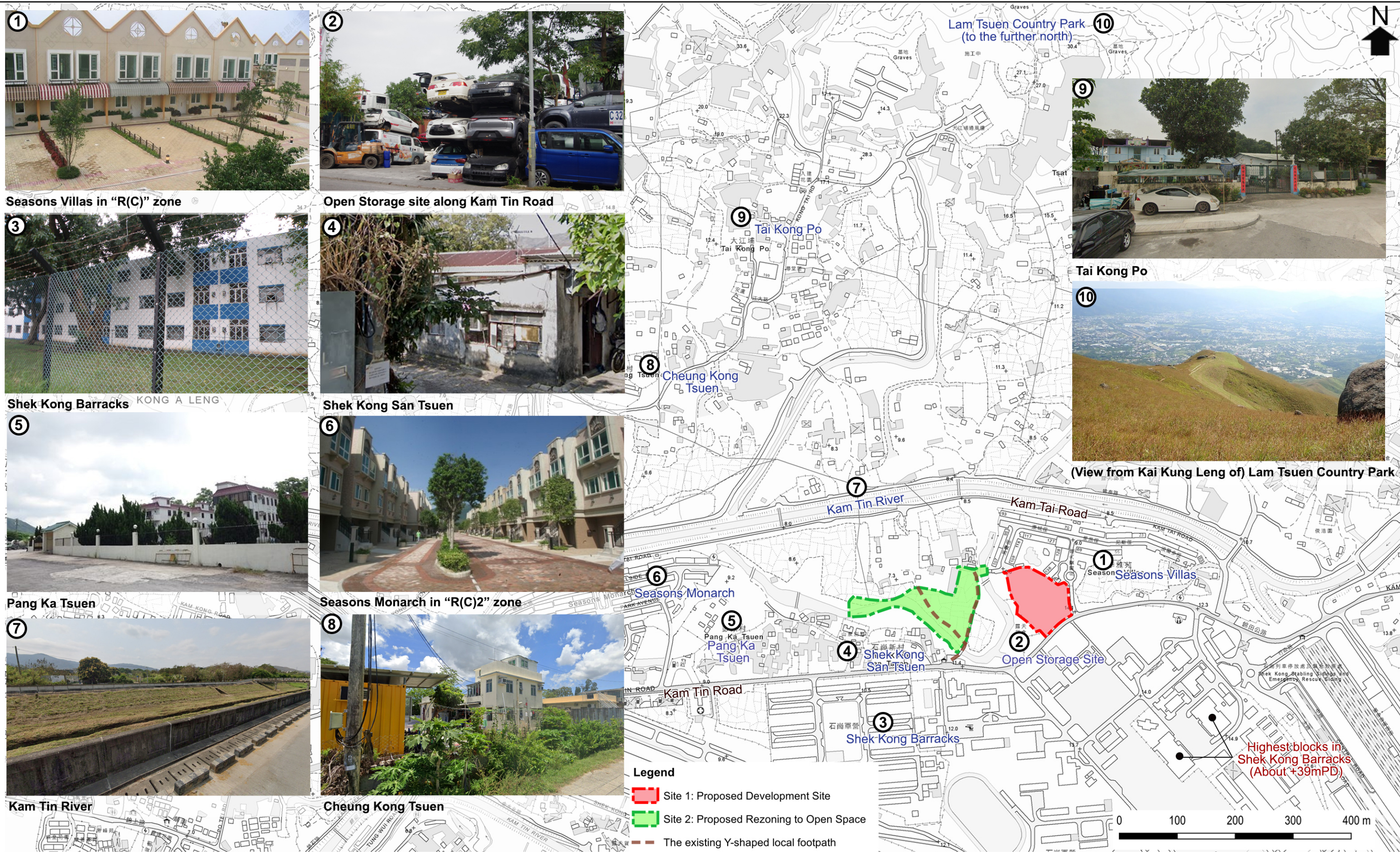


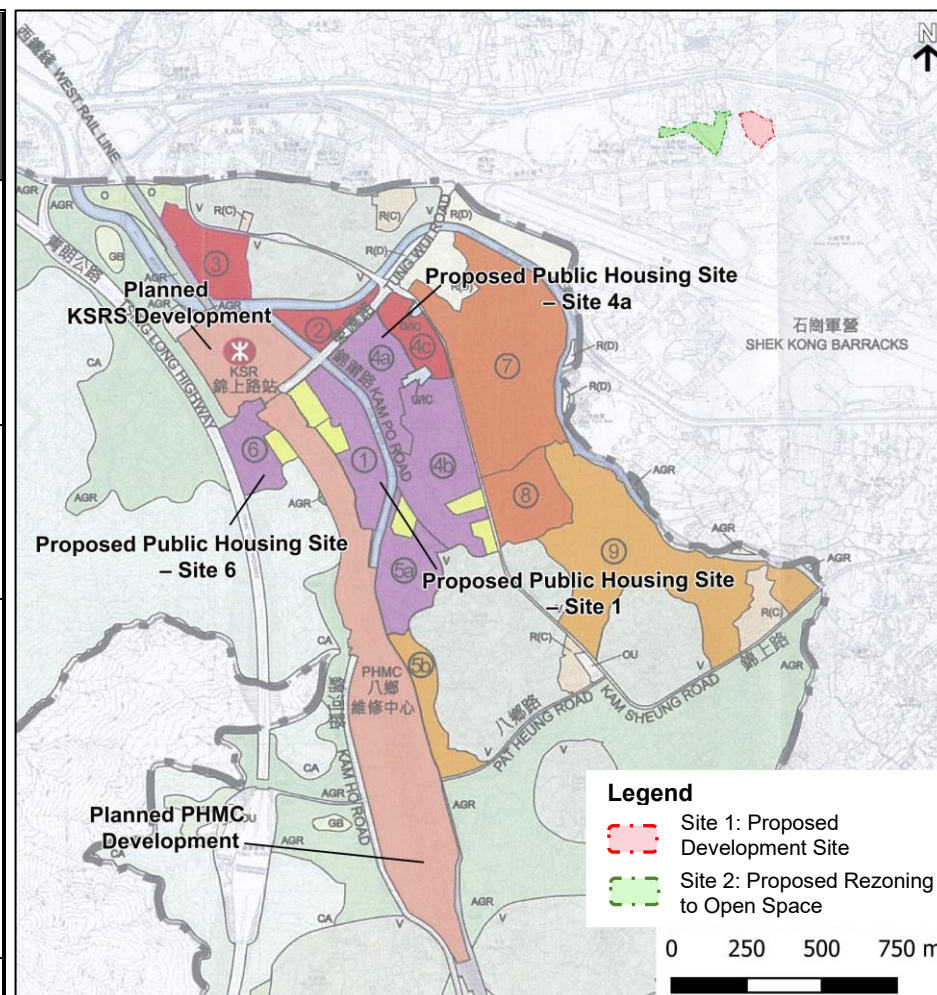
Table 3.1 Potential Development Sites identified in the Land Use Review for Kam Tin South and Pat Heung

Site	Location	Prevailing Zoning under OZP [Development restriction]	Proposed Zoning under the Land Use Review [Development restriction]	Planned/ Target PR ^[1]	Expected Completion	No. of Units (about)
Potential Development Sites with Rezoning Completed/ Advance Status						
1	KSRS	“OU(Railway Station and Public Transport Interchange with Commercial/Residential Development)” [D GFA: 186,234 m ² ; ND GFA: 53,535 m ² ; BHR: 69mPD]		3.0	2024-2025 ^[2]	2,692 ^[3]
2	PHMC	“OU(Railway Station and Public Transport Interchange with Commercial/Residential Development)” [D GFA: 422,340 m ² ; ND GFA: 3,000 m ² ; BHR: 109mPD for Area (a)]		3.0	No available information	6,060 ^[3]
3	Public housing development at Site 1	“R(A)” [PR: 3.0; BHR: 69mPD]		3.0	2025-2026 ^[2]	4,100 ^[4]
4	Public housing development at Site 4a	“R(A)” [PR: 3.0; BHR: 69mPD]		3.0	2025-2026 ^[2]	3,800 ^[4]
5	Public housing development at Site 6	“R(A)” [PR: 3.0; BHR: 69mPD]		3.0	2025-2026 ^[2]	1,700 ^[4]
Potential Development Sites with Rezoning to be Initiated						
6	Private housing development at Site 2	“CDA” [PR: 0.4 BHR: 3 storeys (9m)]	N/A	2.1	N/A	452 ^[1]
7	Private housing development at Site 3	“R(C)” [PR: 0.8, SC: 40%; BHR: 4 storeys (12m)]	N/A	2.1	N/A	1,106 ^[1]
8	Private housing development at Site 7	“R(D)” [PR: 0.2 BHR: 2 storeys (6m)]	N/A	1.5	N/A	3,018 ^[1]
9	Public housing development at Site 4b	OU(Rural Use) [PR: 0.4 BHR: 3 storeys (9m)]	N/A	3.0	N/A	5,700 ^[1]
10	Private housing development at Site 4c	OU(Rural Use) [PR: 0.4 BHR: 3 storeys (9m)]	N/A	2.1	N/A	626 ^[1]

11	Public housing development at Site 5a	Agriculture [nil]	N/A	3.0	N/A	3,300 ^[1]
12	Private housing development at Site 5b	Agriculture [nil]	N/A	0.8	N/A	289 ^[1]
13	Private housing development at Site 8	Agriculture [nil]	N/A	1.5	N/A	882 ^[1]
14	Private housing development at Site 9	Agriculture [nil]	N/A	0.8	N/A	1,676 ^[1]
						Total No. of Units: 35,401
Remarks: [1] TPB Paper No. 9590 refers. [2] Legislative Council Paper No. PWSC(2018-19)17 refers. [3] RNTPC Paper No. 6/15 refers. [4] Traffic Impact assessment Report of Sites 1, 4a and 6 refers.						

Table 3.2 Adjacent Planned Developments in Kam Tin South

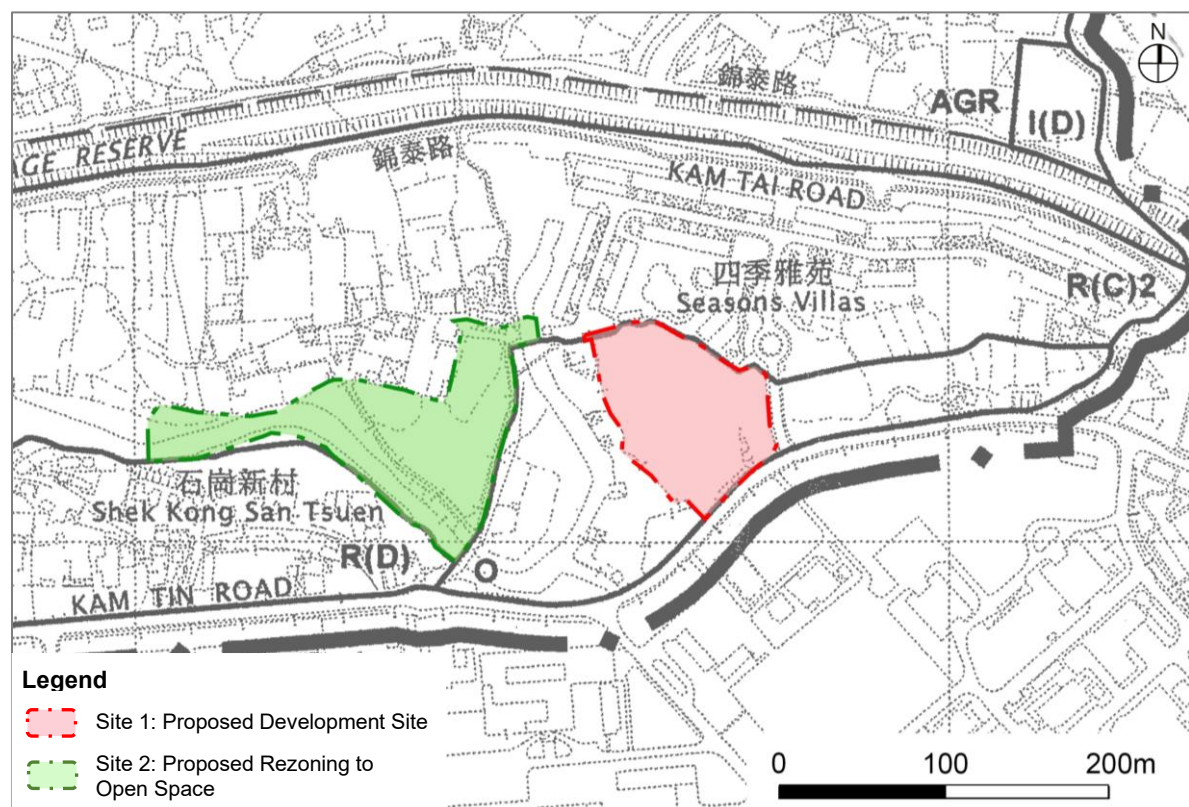
Planned Development Sites with Rezoning Completed	Distance/ Direction	Zoning on Kam Tin South OZP	Building Height Restriction	Expected Completion Year
Planned KSRS Development	Approx. 1.4km/ SW	OU (Railway Station and Public Transport Interchange with Commercial/ Residential Development)	+69mPD	2024 – 2025 ⁽¹⁾
Planned PHMC Development	Approx. 1.9m/ SW	OU (Railway Depot with Commercial Residential Development)	+109mPD	No available information
Proposed public housing site under the LUR – Site 1	Approx. 1.4m/ SW	Residential (Group A) (R(A))	+69mPD	2025 – 2026 ⁽¹⁾
Proposed public housing site under the LUR – Site 4a	Approx. 1.1km/ SW			
Proposed public housing site under the LUR – Site 6	Approx. 1.7km/ SW			
Reference: (1) LegCo Paper No. PWSC(2018-19)17				

**Figure 3.3 Adjacent Planned Developments at Kam Tin South**

3.3 Statutory Zoning Requirement

- 3.3.1 Site 1 falls primarily within an area zoned “Open Space” (“O”) with a minor portion of it in the north falling within the “Residential (Group C) 2” (“R(C)2”) zone, while Site 2 falls entirely within an area zoned “R(C)2” on the prevailing approved OZP No. S/YL-KTN/11 (**Figure 3.4** refers).
- 3.3.2 The planning intention of the “R(C)2” zone, according to the Notes of the Approved OZP, is intended primarily for “*low-rise, low-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board*”. The Remarks of the Statutory Notes of the “R(C)2” zone also specify that “*no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 0.4 and a maximum building height of 3 storeys (9m) including car park*”.
- 3.3.3 In addition, the planning intention of the subject “O” zone is intended primarily “*for the provision of outdoor open-air public space for active and/or passive recreational uses serving the needs of local residents as well as the general public*”.

Figure 3.4: Zoning Context Plan



(Extracted from Approved OZP No. S/YL-KTN/11)

4. THE PROPOSED DEVELOPMENT

4.1 The Indicative Development Scheme

- 4.1.1 An Indicative Master Layout Plan ("MLP") is prepared to illustrate the Proposed Development at Site 1 with a total site area of about 8,580m². With a maximum PR of 1.0, the indicative development yields a total domestic Gross Floor Area ("GFA") of not more than 8,580m², providing about a total of 240 residential units. It comprises a total of 6 nos. of residential towers with 6 storeys above ground (including G/F for entrance lobby / car park / E&M facilities). With site formation level at 10.4mPD, the referencing building height is about 28.9mPD.
- 4.1.2 The 1-storey clubhouse with green roof is located in the central portion; the sewage treatment plant (STP) involves 1 storey above ground and the underground storage tank; while the stormwater storage tank (SST) involves one storey below ground (tentatively below Tower 3 and Tower 4). Carparking spaces and L/UL bays are provided on the ground level, minimising the need for extensive excavation.
- 4.1.3 The indicative MLP, G/F plan and Section Plan are provided in **Appendix 1** of the Planning Statement, while the development schedule of the Proposed Development is provided in **Table 4.1** below.

Table 4.1 Key Development Parameters

Key Parameters		
Development Site Area ⁽¹⁾	About 8,580 m ²	
Max. Plot Ratio (domestic only)	1	
Max. GFA (domestic)	About 8,580 m ²	
Proposed Max. Building Height (BH)	Residential Towers	6 storeys above Ground (Reference BH at about 28.9mPD)
	Clubhouse	1 storey above Ground
	Sewage Treatment Plant (STP)	1 storey above Ground, with the tank underground
	Stormwater Storage Tank (SST)	underground
No. of blocks	Residential Towers: 6 Clubhouse: 1 STP: 1	
Site Coverage	Not more than 56%	
No. of units	240	
Average unit size	About 35.8 m ² in GFA	
Anticipated Population	648 ⁽²⁾	
Private Communal Open Space	Not less than 648 m ² (1 m ² per person)	
Greenery provision	Not less than 20% of development site area	
Target complete year	Year 2031	

Note

(1): The area of the private land is based on measurement in GIS only; the accurate area is subject to land survey when setting out the site boundary.

(2): Average household size of 2.7 is adopted, by making reference to the territorial average household size in the 2021 Population Census.

Open Space Portion

4.1.4 This Application also involves proposed rezoning of a site (Site 2) from “R(C)2” to “O” zone, which is located to the immediate west of the prevailing “O” zone that the Development Site falls within. Site 2 has an area of about 12,303m². As a result, there will be a net increase in about 3,807m² in total area of “Open Space” zone¹ under the prevailing Kam Tin North OZP.

4.1.5 Site 2 involves private land area of about 8,255m², which is all owned by the Applicants. Upon approval, the Applicants are prepared to surrender the private land in Site 2 for Government’s implementation of the Public Open Space.

¹ Net increase area zoned “O” = 12,303m² – 8,496m² (area currently zoned “O” in Site 1) = 3,807m².

4.2 Sensible Design Measures

4.2.1 In view of the sub-urban township location of the Development Site, the Applicants have made tremendous efforts to incorporate various sensible design measures aiming to enhance the existing built environment while respecting the existing building height in the vicinity. The sensible design measures included are as follows:

a. **Appropriate Building Height**

The building height of the Proposed Development has been carefully devised to create a harmonious built form of the adjacent suburban township. The building height is at maximum 6-storey above ground (28.9mPD). The Proposed Development is in general visually compatible with surrounding private residential developments (about +16 to +18mPD), village clusters (about +13 to 15mPD), and blocks in the Shek Kong Barracks (about +15 to +39mPD), which could enhance the visual interest of the Proposed Development.

b. **Maintaining Building Setback from Shek Kong Barracks**

There is at least 19m setback distance of the nearest blocks (i.e. T1 and T6) from the southern site boundary of Site 1 / about 28m from the site boundary of Shek Kong Barracks. This could maintain minimal visual impact to the Barracks.

c. **Podium Free Design**

The towers sit on ground level with car parking spaces and L/UL bays either outdoor or below towers. The clubhouse with green roof is located in the central portion. This would create a comfortable living environment internally as well as reducing the bulkiness as viewed from the outside.

d. **Central Courtyard Design**

As the clubhouse with green roof is located in the central portion, it creates greenery in the central part; providing visual relief to the future residents surrounding it. It also provides adequate central separation amongst the three clusters of towers.

e. **Outdoor Communal Open Space and Landscaped Area in the North**

The area in the northern portion (i.e. to the north of T3 and T4) is reserved mainly for communal open space and landscaped area for the future residents. Although there would be underground SST, the Ground level provide opportunities for tree planting (in raised planter) and recreational use. It also acts as a buffer between the blocks of the Proposed Development and Seasons Villas to the north.

f. **Setback from Site Boundary with Periphery Tree Planting**

It is aimed to maintain at least 5m setback from site boundaries of each

side, which provides space for periphery tree planting to soften the edge of the development site.

g. **Building Gaps allowing Wind Penetration**

The six blocks are situated in three main clusters, maintaining at least 15m separation between each of the clusters. There is also at least 5m building setback from site boundary of each side. As revealed from Air Ventilation Assessment – Expert Evaluation (AVA-EE) in **Appendix 5** of the Planning Statement, the building gaps and building setback could facilitate wind permeability. The building height is 6-storey only so that the wind flowing atop the towers can still reach further downwind pedestrian area. Therefore, it is concluded that the Proposed Development with the design measures is unlikely to impose significant adverse impact on the surrounding sites from air ventilation perspective.

5. IDENTIFICATION OF VISUAL ELEMENTS AND PRELIMINARY ANALYSIS

5.1 Identification of Visual Envelope and Visual Sensitive Receivers

5.1.1 As prescribed in the TPB PG-NO. 41, 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). Since the actual maximum building height of the Proposed Development will be about 20m, the assessment area covers a radial area of about 60m from the façade of the Proposed Development.

5.1.2 As the Development Site (Site 1) is surrounded by low-rise domestic developments and temporary structures in the surroundings with a mountain backdrop in the further north, the VSRs to the west, east, and further north of Site 1 across Kam Tin River, may have exposed views of the Proposed Development. Having regard to the aforementioned actual building height of the Proposed Development and its potential visibility from the selected viewing points, the VE of the Proposed Development with pronouncedly visible or partially visible views from key sensitive viewers is presented in **Figure 5.1**, which is at a much wider extent from the 3H zone.

5.1.3 Since protecting private view is not the purview 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 will be identified. In the suburban setting, VPs are mainly defined by existing low-rise developments and existing vegetation as these elements may have partially hidden the Proposed Development when viewing from distant.

5.2 Selection of Representative Viewpoints

5.2.1 To ascertain the visual impact of the Proposed Development, the visual analysis has been conducted based on the existing site context. Representative VPs within the VE were selected for assessing the visual impact to the VSRs. 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, existing/future pedestrian nodes, key pedestrian/vehicular corridor, and existing major vistas will be considered as major visual sensitive viewpoints. In this VIA, five 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**.

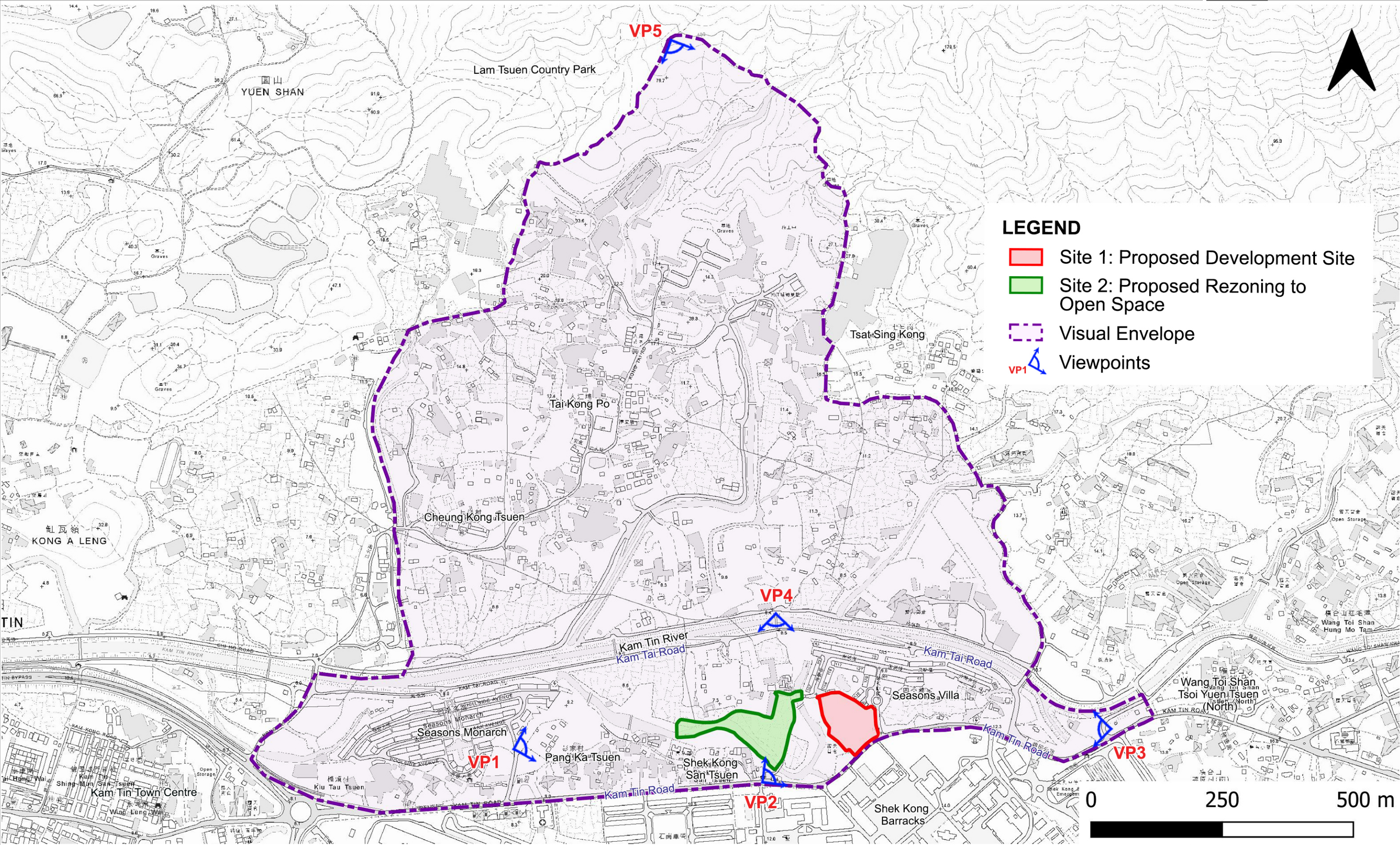


Table 5.1 Selected Visually Sensitive Viewpoints

Viewpoint ID	Description
Local Viewpoints (4 nos.)	
VP1	Access Road leading to Seasons Monarch and Pang Ka Tsuen
VP2	Bus Stop at Kam Tin Road
VP3	Sitting-out Area near Shek Kong Vegetable Marketing Co-operative Society
VP4	Footbridge across Kam Tin River
Distant Viewpoint (1 no.)	
VP5	Hiking Trail towards Kai Kung Leng at Lam Tsuen Country Park

VP1 – Access Road leading to Seasons Monarch and Pang Ka Tsuen

- 5.2.2 This VP is taken at a road which branches off from Kam Tin Road at a level of about +8.5mPD, which is a frequent passageway leading to Seasons Monarch and Pang Ka Tsuen. It is close to the “O” zone to the immediate south of Seasons Monarch, which has not been implemented as an open space. VP1 is taken on the curb of the road opposite to the existing graves in Pang Ka Tsuen and is about 600m west of Site 1. It mainly captures the view of the existing graves, tree plantings, the village houses in Pang Ka Tsuen and the adjacent petrol filling station in the foreground, and the open sky view with a glimpse of the mountain range of Lam Tsuen Country Park in the background. This VP represents the view of the pedestrians and drivers traveling along the road between the nearby residential developments (i.e. Seasons Monarch and Pang Ka Tsuen) and Kam Tin Road to the west of the Site.

VP2 – Bus Stop at Kam Tin Road

- 5.2.3 Kam Tin Road is a single dual lane road and one of the major transport arteries in Kam Tin North. This section of Kam Tin Road runs from an east-west direction. VP2 is taken at a bus stop at a level of about +11.4mPD, which is about 165m southwest of Site 1. It captures the view of the existing roadside tree plantings along Kam Tin Road in the foreground. Partial sky view and the mountain range of Lam Tsuen Country Park (Tai To Yan) are visible in the background. This VP represents the view of the pedestrians, drivers, and passengers waiting for bus services along Kam Tin Road.

VP3 – Sitting-out Area near Shek Kong Vegetable Marketing Co-operative Society

- 5.2.4 This VP is taken from the existing sitting facilities near Shek Kong Vegetable Marketing Co-operative Society at the junction of Kam Tin Road and Wang Toi Shan Shan Tsuen Road at +13mPD from about 450m east of Site 1. The VP is selected to assess the potential visual impact on the VSRs including the users of the sitting facilities who engage in passive recreational activities, and the pedestrians and drivers traveling along the junction of Kam Tin Road and Wang Toi Shan Shan Tsuen Road to the east of Site 1. The view of this VP is comprised of the open sky view, existing vegetation and low-rise domestic settlements in Wang Toi Shan Tsoi Yuen Tsuen (North) in the foreground, partial views of the blocks in Shek Kong Barracks, the structures along Kam Tin River and the foothill of Kai Kung Leng in the background.

VP4 – Footbridge across Kam Tin River

- 5.2.5 Kam Tin River, which runs parallel along the Development Site to the north, is a major visual vista in providing visual linkage to the Site. This VP is taken from a footbridge across Kam Tin River (about 190m to the north of the Site) at Kam Tai Road at formation level of about +8.5mPD. This VP is selected to assess the potential visual impact on the VSRs including the pedestrians engaging in various leisure recreational activities such as walking and jogging along the Kam Tin River as well as the drivers traveling along Kam Tai Road. VP4 captures the existing shrubs and tree plantings along Kam Tin River and the houses of Seasons Villas in the foreground. Partial view of the mountain range of Lin Fa Shan is also visible.

VP 5 – Hiking Trail towards Kai Kung Leng at Lam Tsuen Country Park

- 5.2.6 This VP is taken from the hiking trail in Lam Tsuen Country Park at about +100mPD with an approximately 1.28km viewing distance from the north of the Site. This section of hiking trail is a route for hikers hiking from Kam Tin North towards the peak of Kai Kung Leng. This VP is selected to assess the potential visual impact on the VSRs including hikers and the public engaging in various leisure recreational activities such as walking and jogging along the trail as well as the grave sweepers. VP5 captures the existing grass, shrubs and trees along the hiking trail in the foreground and a panoramic view of the existing low-rise domestic settlements, village clusters and temporary structures in the foothill of Kai Kung Leng and the Kam Tin area. The continuous mountain range of Lin Fa Shan are visible. There is also a slight glimpse of the existing high-rise residential developments in Yuen Long at the background.

5.3 Preliminary Analysis

- 5.3.1 The VIA evaluates the degree of visual impact of the Proposed Development that will be created to its surroundings and VSRs, especially at the VPs identified. **Table 5.2** outlines the details of the VPs and provides with preliminary analysis including the nature of the VSRs, the quality of existing view, the frequency of use and popularity of the spot.
- 5.3.2 The visual impacts of the public VSRs from the selected five VPs will be assessed in detail in **Section 6**.

Table 5.2 Identified Visually Sensitive Viewpoints with Preliminary Analysis

Viewpoints (VPs)	Distance/ Direction	Level of the VP in mPD (Approx.)	Visually Sensitive Receivers	Popularity by Public	Nature of VP	Visual Sensitivity ²	Visual Quality ³
Local Viewpoints							
VP1 – Access Road leading to Seasons Monarch and Pang Ka Tsuen	Approx. 600m/ west	+8.5	Pedestrians/Drivers	Frequent	Transient	Low to Medium	Fair
VP2 – Bus Stop at Kam Tin Road	Approx. 165m/ southwest	+11.4	Pedestrians/ Passengers/ Drivers	Frequent	Transient	Low	Good
VP3 – Sitting-out Area near Shek Kong Vegetable Marketing Co-operative Society	Approx. 450m/ east	+13	Users of the sitting facilities/ Pedestrians/Drivers	Occasional	Transient/ Passive Recreation	Medium	Fair
VP4 – Footbridge across Kam Tin River	Approx. 190m/ north	+8.5	Pedestrians/Drivers	Occasional	Transient/ Passive Recreation	Low to Medium	Good
Distant Viewpoint							
VP5 – Hiking Trail towards Kai Kung Leng at Lam Tsuen Country Park	Approx. 1.28km/ north	+100	Hikers and general public	Occasional	Active and Passive Recreation	Medium to High	Good

² Visual sensitivity is determined by the types of activities the VSRs are engaging in and the duration and distance over which the Proposed Developments would remain visible. For example, people engaging in active recreational activities such as playing basketball or football at the VP are less sensitive to visual change than passive recreational activities.

³ Visual quality is assessed based on the openness and permeability of the view as well as the visibility of visual resources including prominent ridgelines, the harbour, natural coastlines, open sea horizon, skyline, scenic areas, valued landscape, special landmark, heritage features to be preserved.

6. ASSESSMENT OF VISUAL IMPACTS

6.1 General

- 6.1.1 Since the primarily objective of this VIA is for evaluating the visual impact of the Proposed Development in support of the S12A Amendment of Plan Application, the assessment will assess the potential visual impact of the overall bulk devised under Indicative MLP to the identified VSRs. The relevant appraisals in relation to visual composition, visual obstruction and effects on public viewers and effects on visual resources are focused on the changes to be brought by the Proposed Development.

6.2 VP1 – Access Road leading to Seasons Monarch and Pang Ka Tsuen (Figure 6.1 refers)

Visual Composition

- 6.2.1 This VP is taken at the road leading to the residential developments in Seasons Monarch and Pang Ka Tsuen to the west of the Development Site. As shown in the photomontages in **Figure 6.1**, the existing visual composition comprises the village houses at Pang Ka Tsuen, the tree plantings surrounding the graves and adjacent the petrol filling station in the foreground and the open sky view with a glimpse of the mountain range of Lam Tsuen Country Park in the background. At a viewing distance of about 600m, the middle and lower portions of the Proposed Development will be screened off by the existing village houses and vegetation surrounding the graves in the foreground. The Proposed Development will slightly alter the visual composition of this VP upon completion by extending the existing sub-urban townscape view to the further back of this VP.

Visual Obstruction

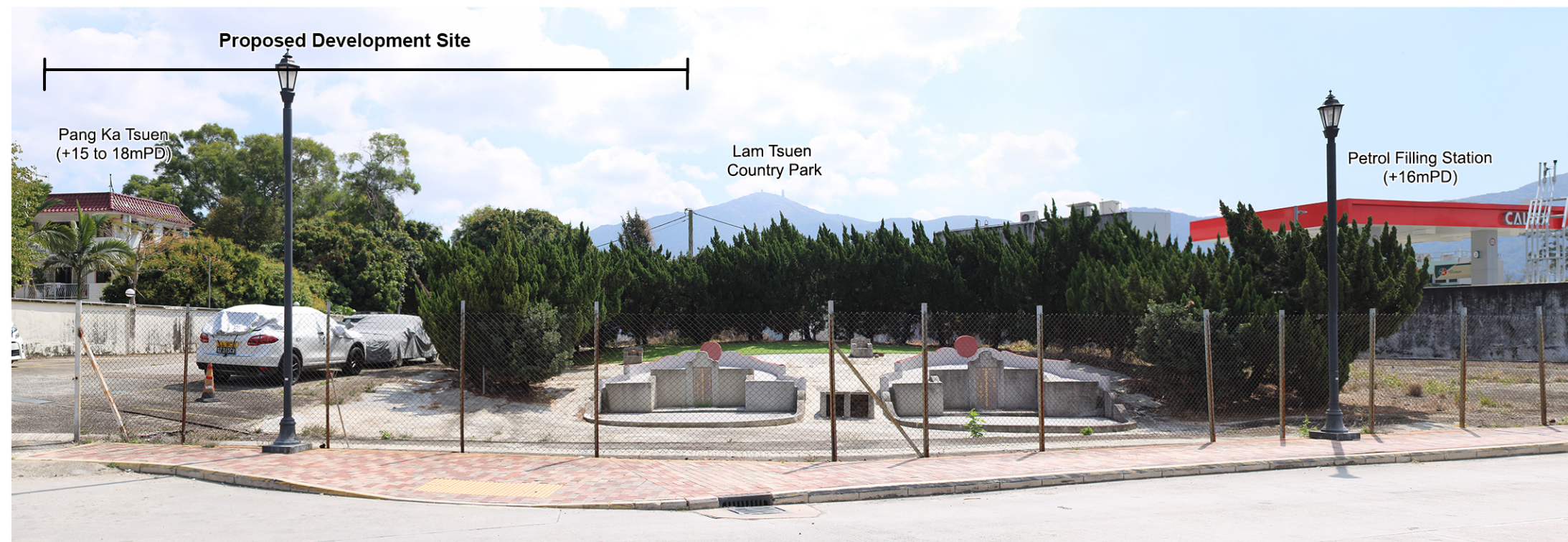
- 6.2.2 From **Figure 6.1**, it is illustrated that the major portions of the Proposed Development will be screened off by the existing vegetation surrounding the graves near Pang Ka Tsuen. The Proposed Development will not lead to visual obstruction to the view of the existing open skyline and existing green backdrop at Lam Tsuen Country Park in the background. The impact brought by the Proposed Development to the visual openness experienced by the VSRs at VP1 will be negligible.

Effect on Public Viewers

- 6.2.3 The key VSRs at this VP will be mainly the pedestrians and drivers traveling along the road leading to residential developments in Seasons Monarch and Pang Ka Tsuen and their visual sensitivity will be low to medium. The view of middle and lower portions of the Proposed Development will be filtered by the vegetation at the foreground. While the upper portion of the Proposed Development is still visible at this VP, it would visually blend in with the existing low-rise domestic settlements in Pang Ka Tsuen in the suburban townscape setting. Hence, the effect of the Proposed Development on the visual changes from the VSRs would be **negligible**.

Effect on Visual Resources

- 6.2.4 From this VP, the Proposed Development would be mostly screened off by the existing vegetation surrounding the graves near Pang Ka Tsuen. The Proposed Development would also blend well with the townscape view comprising of existing low-rise suburban settlements. The impact of the Proposed Development on the visual resources of the surrounding area is therefore negligible.



Existing Condition



With Proposed Development



Key Plan

6.3 VP2 – Bus Stop at Kam Tin Road (*Figure 6.2 refers*)

Visual Composition

- 6.3.1 As shown in the photomontages in **Figure 6.2**, the existing visual composition comprises the existing roadside tree plantings on the northern side of Kam Tin Road. Partial sky view and the mountain range of Lam Tsuen Country Park (Tai To Yan) are also visible in the background. The proposed development appears to be behind the large trees and is partially visible on the right hand side. The skyline backdrop on the right of the view is partially occupied by the proposed development, while the existing distant mountain backdrop and skyline will not be affected by the proposed residential towers. While the towers appear to be at similar height with the large tree in the foreground, the Proposed Development is considered visually compatible with the surrounding sub-urban developments as it will not affect the visual composition for this VP.

Visual Obstruction

- 6.3.2 As shown in **Figure 6.2**, with a close viewing distance to Site 1 from this VP, the Proposed Development appears to have obstructed partially the skyline to the right of the large tree. The visual linkage from this VP towards the mountain range of Lam Tsuen Country Park will remain unchanged. Hence, it is considered that the Proposed Development will induce slight to moderate degree of visual obstruction to the existing skyline and visual openness at VP2.

Effect on Public Viewers

- 6.3.3 As the VSRs of VP2 will mainly be pedestrians, drivers and passengers waiting for bus services along Kam Tin Road, which are transient in nature and thus their visual sensitivity will be low. The existing tree plantings along Kam Tin Road in the foreground will not be affected by the Proposed Development (not within Site 1). The façade treatment and façade colour scheme in natural tone would help provide visual relief. To some extent, the Proposed Development would also visually blend in with the existing low-rise domestic settlements in Seasons Villas by extending the suburban townscape along Kam Tin River. With the trees along Kam Tin Road having a dominant presence in the foreground, the Proposed Development (located about 165m to the northeast of VP2) is considered to have minor impact to the visual openness at this VP. The effect of the Proposed Development on the visual changes from the VSRs would be **slight**.

Effect on Visual Resources

- 6.3.4 The carefully thought-out building design of the Proposed Development in terms of maximum building height (+28.9mPD) and setback from Kam Tin Road would provide further visual relief. Therefore, while the Proposed Development will inevitably become a visually dominating element at VP2, it would not induce significantly adverse impact to the visual character or quality of the suburban landscape view at this VP.



Existing Condition



With Proposed Development



Key Plan

6.4 VP3 – Sitting facilities near Shek Kong Vegetable Marketing Co-operative Society (Figure 6.3 refers)

Visual Composition

- 6.4.1 As shown in **Figure 6.3**, the existing visual composition at VP3 comprises of the existing vegetation and low-rise domestic settlements along the edge of Wang Toi Shan Tsoi Yuen Tsuen (North), structures in the Shek Kong Barracks and domestic developments and tree plantings along Kam Tin River. When viewing from the sitting facilities at this VP, there is a slight glimpse of the upper portions of the Proposed Development. The majority of the Proposed Development will be screened off by the existing vegetation and the low-rise domestic settlements in the foreground. Hence, the Proposed Development will only result in slight change to the overall visual composition to this VP.

Visual Obstruction

- 6.4.2 From this VP, the existing view is dominated by existing vegetation along the edge of the Wang Toi Shan Tsoi Yuen Tsuen (North) and Kam Tin River as well as the adjacent low-rise domestic settlements, which are the prominent visual resources at this VP. As shown in **Figure 6.3**, only the upper portion of some of the proposed residential towers would be visible. The visual impact of the Proposed Development on the existing skyline and visual openness of VP3 is negligible.

Effect on Public Viewers

- 6.4.3 As the VSRs at VP3 are mainly the users of the sitting facilities engaging in passive recreation activities and the pedestrians and drivers traveling along the junction of Kam Tin Road and Wang Toi Shan Shan Tsuen Road, their visual sensitivity will be medium to high. It is illustrated in **Figure 6.3** that a major portion of the Proposed Development, with a viewing distance of about 450m from the VP, will be screened off by the existing trees along the edge of the Wang Toi Shan Tsoi Yuen Tsuen (North). The Proposed Development would blend in well with the surrounding existing rural townscape although the highest floors above the trees in the foreground would be seen and minor loss of open skyview in some degree is resulted in. Hence, the effect of the Proposed Development on the visual changes from the VSRs would be **slight**.

Effect on Visual Resources

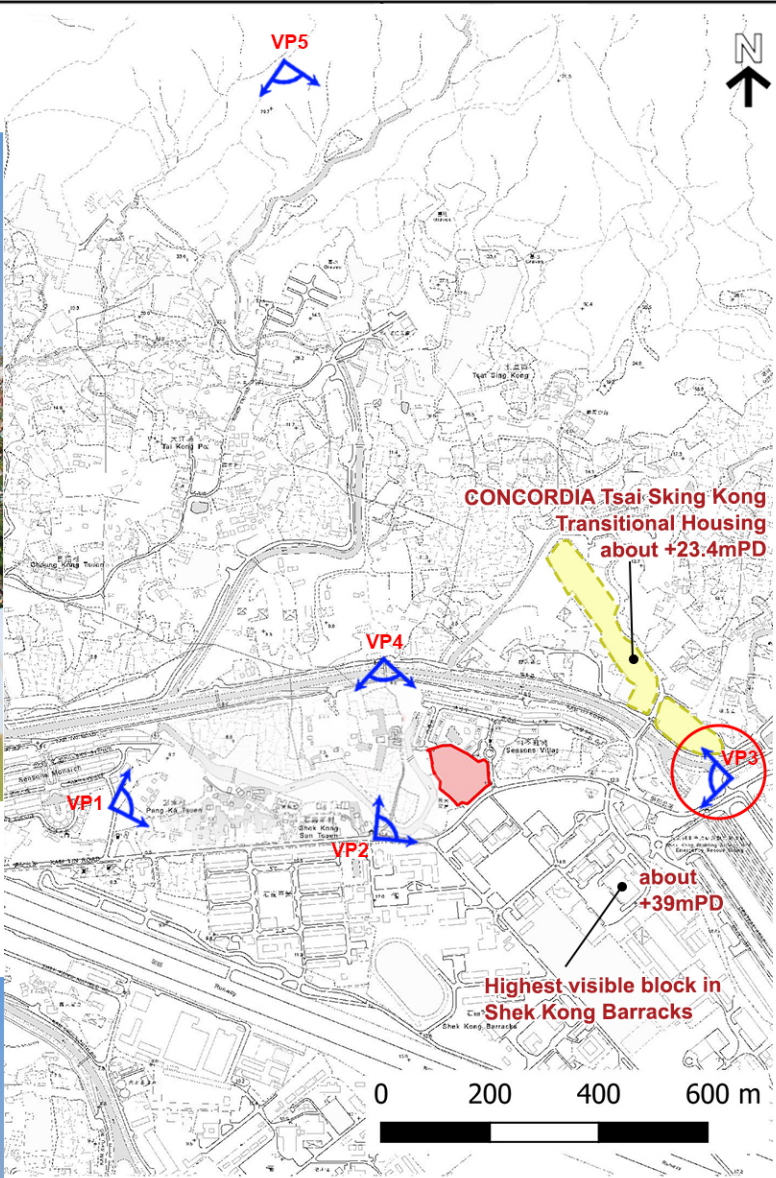
- 6.4.4 The visual resources such as skyline and mountain backdrop will not be affected by the Proposed Development. The impact of the Proposed Development on the condition, quality and character of the visual resources in the surrounding rural area at this VP is therefore negligible.



Existing Condition



With Proposed Development



Key Plan



Photomontage Viewing from
Sitting-out Area near Shek Kong Vegetable Marketing Co-operative Society
(VP3)

S12A Amendment of Plan Application -
Various Lots in D.D. 110 and
Adjoining Government Land, Shek Kong,
Yuen Long, N.T.

Figure 6.3

Visual Impact Assessment

Date: 17 July 2025

6.5 VP4 – Footbridge across Kam Tin River (*Figure 6.4 refers*)

Visual Composition

- 6.5.1 This VP is taken on the northern bank of the Kam Tin River to the north of the Development Site at a viewing distance of about 190m. The existing visual composition comprises the existing shrubs and tree plantings along Kam Tin River and the houses of Seasons Villas in the foreground and distant view of the mountain range of Lin Fa Shan. The Proposed Development will be largely screened off by the existing vegetation and houses along Kam Tin Road in the foreground (**Figure 6.4** refers). The Proposed Development will have no effect onto the visual composition by extending the suburban townscape at this VP.

Visual Obstruction

- 6.5.2 As shown in **Figure 6.4**, the Proposed Development is mainly screened off by the existing trees in the foreground. The view to the skyline and certain degree of visual permeability is maintained at this VP. Visual obstruction due to Proposed Development is considered negligible at this VP.

Effect on Public Viewers

- 6.5.3 The VSRs of VP4 are mainly the pedestrians engaging in passive recreation activities and the drivers traveling along Kam Tai Road. Their sensitivity will be low to medium. As shown in **Figure 6.4**, the Proposed Development is mainly screened off by the existing trees in the foreground. The effect of the Proposed Development on the visual changes from the VSRs would be **negligible**.

Effect on Visual Resources

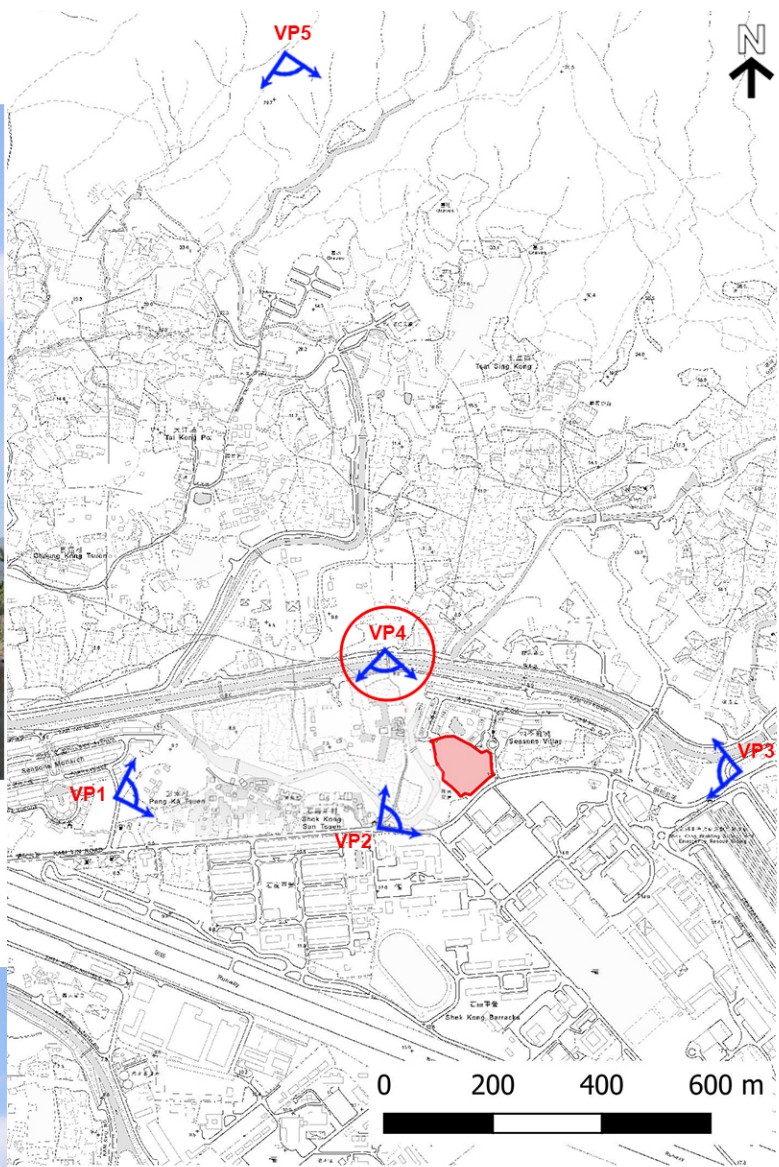
- 6.5.4 From this VP, the Proposed Development would be mainly screened off by the existing trees in the foreground. The visual resources including the skyline and mountain backdrop in the distance are not affected. The impact of the Proposed Development on the visual resources of the surrounding area is therefore negligible.



Existing Condition



With Proposed Development



Key Plan



Photomontage Viewing from
Footbridge across Kam Tin River (VP4)

S12A Amendment of Plan Application -
Various Lots in D.D. 110 and
Adjoining Government Land, Shek Kong,
Yuen Long, N.T.

Figure 6.4

Visual Impact Assessment

Date: 17 July 2025

6.6 VP5 – Hiking Trail towards Kai Kung Leng at Lam Tsuen Country Park (Figure 6.5 refers)

Visual Composition

- 6.6.1 As shown in **Figure 6.5**, the existing visual composition at this VP comprises the existing grass, shrubs and tree plantings along the hiking trail in the foreground, low-rise domestic settlements, village clusters and temporary structures at the foothill of Kai Kung Leng and the Kam Tin area, as well as the existing green backdrop of the Lin Fa Shan. With the planned residential/commercial development at KSRS almost completed, the visual character of the surrounding area will gradually transform from a rural to a suburban townscape setting at this VP (**Figure 6.5** refers). In the long term, the planned residential developments (with plot ratio ranging from 0.8 to 3) in the vicinity of the KSRS and PHMC would dominate the suburban townscape of Kam Tin area. In this regard, the Proposed Development is considered compatible with the future visual composition characterised by a suburban townscape setting at VP5.

Visual Obstruction

- 6.6.2 The visual resources at this VP5 are comprised of the existing visual components of rural and suburban character, including hillside vegetation, and areas intermingled with low-rise domestic settlements, village clusters and temporary structures in the foreground. Distant view to the existing green backdrop, roads, rail tracks and high-rise residential developments atop KSRS are visible in the background.
- 6.6.3 With or without the Proposed Development, the green backdrop will be partially obstructed by the aforementioned planned development at KSRS in the adjacent areas in the background. As shown in **Figure 6.5**, upon the completion of the planned development at KSRS, the Proposed Development would be visible being in front of Shek Kong Barracks, yet at a relatively less prominent scale as compared with the planned developments at KSRS. The building height of the Proposed Development appears to be comparable with the blocks in Shek Kong Barracks at the back. The Proposed Development would merely screen off some vegetation behind it while without affecting the mountain range backdrop. Hence, the blockage of the view induced by the Proposed Development alone would only slightly affect the visual openness experienced by the VSRs.

Effect on Public Viewers

- 6.6.4 The VSRs of VP5 are mainly the hikers and the general public engaging in various types of active and passive recreational activities and their sensitivity will be medium to high. They will have an exposed view of the Proposed Development and the planned high-rise residential developments in the Kam Tin South area characterised by a typical suburban residential townscape.

- 6.6.5 As illustrated in the photomontage in **Figure 6.5**, no matter with or without the Proposed Development, VSRs at this VP will be exposed to noticeable visual impact brought about by the planned high-rise residential developments in Kam Tin South. The Proposed Development, when viewing at a far distance of 1.15km at VP5, would not appear visually intrusive taking into account the planned high-rise residential developments in Kam Tin South. The effect on the visual changes from the VSRs due to the Proposed Development is therefore considered **slight**.

Effect on Visual Resources

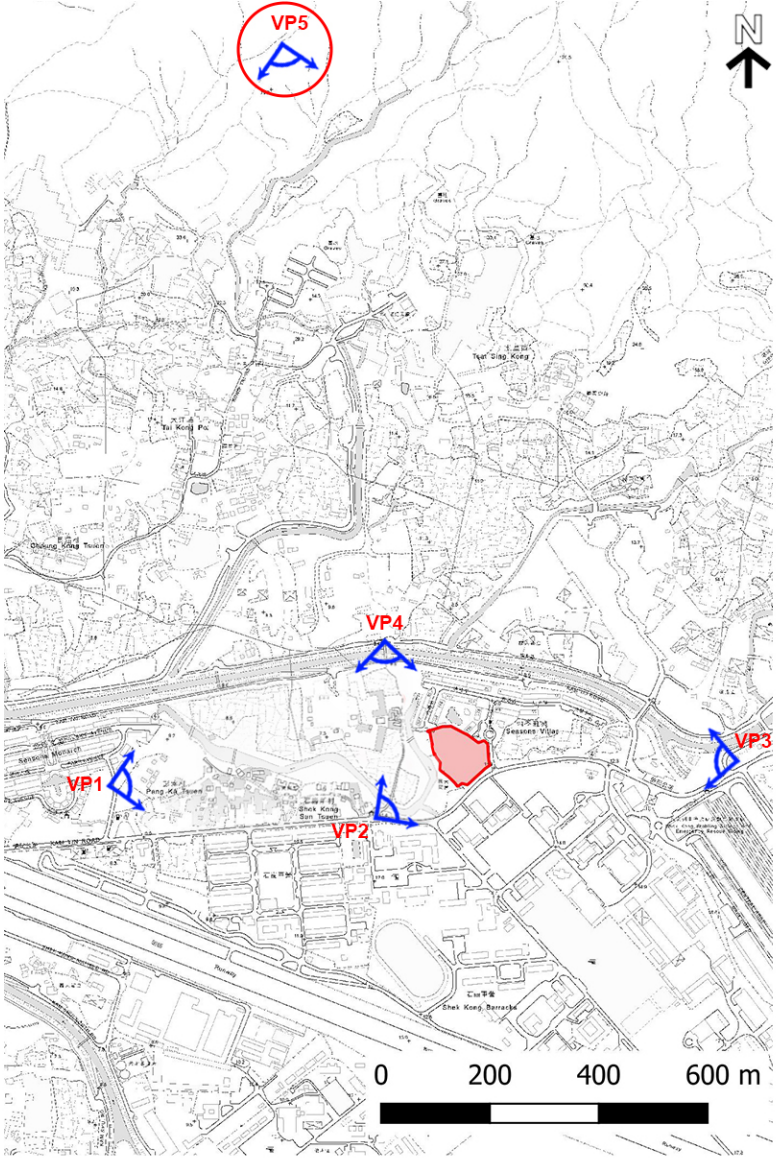
- 6.6.6 The Proposed Development would form part of visual extension of the future suburban townscape of Kam Tin area in harmony with surrounding planned high-rise developments. Thus, it would not significantly affect the visual character or quality of the suburban landscape view.



Existing Condition



With Proposed Development



Photomontage Viewing from
Hiking Trail towards Kai Kung Leng at Lam Tsuen Country Park (VP5)

S12A Amendment of Plan Application -
Various Lots in D.D. 110 and
Adjoining Government Land, Shek Kong,
Yuen Long, N.T.

Figure 6.5
Visual Impact Assessment
Date: 17 July 2025

7. CONCLUSION

- 7.1 Based on the appraisal on visual impact relating to visual composition, visual obstruction, effect on public viewers and effect on visual resources, **Table 7.1** below presents the overall visual impact associated with the Proposed Development to the identified VSRs represented in each VP. The visual impact associated with the Proposed Development is considered negligible (at VPs 1 and 4) to slightly adverse (at VPs 2, 3 and 5).

Table 7.1 Summary of Assessment of Visual Impact at the Viewpoints

Viewpoint	Location	Visual Impact due to Proposed Developments
Local Viewpoints		
VP1	Road leading to Seasons Monarch and Pang Ka Tsuen	Negligible
VP2	Bus Stop at Kam Tin Road	Slightly Adverse
VP3	Sitting facilities near Shek Kong Vegetable Marketing Co-operative Society	Slightly Adverse
VP4	Footbridge across Kam Tin River	Negligible
Distant Viewpoint		
VP5	Hiking Trail towards Kai Kung Leng at Lam Tsuen Country Park	Slightly Adverse

- 7.2 The Proposed Development comprises 6 nos. of residential towers with 6 storeys and 2 nos. of 1-storey structures (residential clubhouse and sewage treatment plant) at site formation levels of about +10.4mPD. Under the Indicative MLP, the proposed BH is about 28.9mPD. In the future, the Proposed Development will be located at proximity to the cluster of planned developments in Kam Tin South comprising high-rise developments at KSRS (with maximum building height of +69mPD) and PHMC (with maximum building height of +109mPD), and the public housing developments at Site nos. 1, 4a, and 6 (with maximum building height of +69mPD) identified in the LUR.
- 7.3 As shown in the photomontages in **Figures 6.1 & 6.4**, the Proposed Development would incur negligible visual impacts at VP1 and VP4 (with viewing distances of about 190m to 600m from the Site) as it would be completely/ mostly screened off by the existing developments and vegetation in the vicinity.
- 7.4 At VP1, major portions of the Proposed Development would be screened off by the existing vegetation surrounding the graves near Pang Ka Tsuen, thus

- resulting in no visual obstruction to the view of the existing open skyline and green backdrop at Lam Tsuen Country Park. At VP4, the entire Proposed Development would be entirely screened off by the existing trees in the foreground and thus no adverse visual impact is anticipated.
- 7.5 The Proposed Development would result in slightly adverse impact respectively at the three remaining VPs (i.e. VP2, VP3 and VP5).
- 7.6 The Proposed Development would inevitably become a key visual component at VP2 with a viewing distance of just about 165m from the southwest of Site 1 (**Figure 6.2** refers). While there would be slight visual obstruction to the existing sky view at VP2, the middle and lower portions of the Proposed Development will be screened off by the existing trees along the Kam Tin Road. The Proposed Development with main roof level at 28.9mPD is seen to be at comparable height with the large tree in the foreground. In addition, the carefully thought-out building design of the Proposed Development in terms of variation in building height as well as setback from Kam Tin Road would provide further visual relief. The adoption of natural color tone in building façade would also ease the visual impact due to the building bulk.
- 7.7 At VP3, the view to the major portion of the Proposed Development will be filtered by the existing vegetation and the low-rise domestic settlements at Wang Toi Shan Tsoi Yuen Tsuen (North). Resulting in minor loss of open skyview in some degree and only the highest floors being seen from this VP, the associated visual impact at this VP is considered slightly adverse. The adoption of natural color tone in building façade would ease the visual impact due to the building bulk.
- 7.8 With a viewing distance of about 1.28km from the Proposed Development at VP5 (**Figure 6.5** refers), the Proposed Development would be visible in the suburban context, yet at a relatively less prominent scale as compared with the soon-to-be-completed development at KSRS, as well as other planned developments around KSRS in the long term, which will gradually transform Kam Tin area from a rural to a suburban township. Upon the completion of the adjacent high-rise developments, the Proposed Development will not bring substantial change to the visual character and composition of the area when viewing from the distant VP (i.e. VP5).
- 7.9 In view of the above, with the provision of various sensible design measures including suitably spaced building layout and setback, it is considered that the Proposed Development with BHR of 6 storeys (at about 28.9mPD) at the Development Site (Site 1) is acceptable in visual terms.

- End -