

**Business Facilitation Advisory Committee  
Pre-construction Task Force**

***Revised Draft Town Planning Board Guidelines  
for Submission of Visual Impact Assessment***

**Purpose**

This paper introduces the revised draft of Town Planning Board (TPB) Guidelines for submission of Visual Impact Assessment (VIA) for Members' information.

**Introduction**

2. The aim of a VIA is to assess the potential visual impact of a development proposal to the surrounding areas. Visual impact of a proposal is a result of the spatial relationship between the development proposal and its surrounding area.

3. The siting, general location and setting, nature, size, scale and prominence of a proposed development are all primary factors for consideration of the need and scope for a VIA in the course of processing planning applications. Normally, a VIA shall not be required when a development proposal complies with development criteria stipulated in the *Notes to the Zoning*, including building height, plot ratio, and / or site coverage for a particular zone.

**Background**

4. After the issue of the first draft of TPB guidelines for submission of VIA (**Annex 1**) on 24 March 2006, the Convenor of the then Town Planning Task Force (TPTF) expressed her views and concerns about the scope and applications of a VIA at **Annex 2**. The subject matter was discussed at the TPTF meetings on 6 June 2006 and 14 September 2006.

5. Having considered and consolidated the comments / suggestions of all the stakeholders, the Planning Department (PlanD) has revised the draft Guidelines with a view to clarifying the scope and requirements of the VIA and addressing the concerns of the consultees as far as practicable. The revised draft Guidelines and the PlanD's responses to comments have been sent to PCTF Members for their comments on 28 February 2008.

6. Major revisions made to the draft Guidelines are highlighted below:

- i) clarify and make clear the scope and requirements of VIA;
- ii) provide an initial guidance on the extent of assessment area i.e. 3H distance from the site boundary, with "H" being the tallest building height;
- iii) clarify that the visual impact should focus on public viewpoints; and
- iv) clarify that the visualisation materials to be submitted should be commensurate with the scale and level of complexity of the project.

### **Views Sought**

7. Members are invited to note the revised draft Guidelines.

Business Facilitation Advisory Committee  
Pre-construction Task Force  
April 2008

# TOWN PLANNING BOARD



TPB Paper No. 7541  
For Consideration by the  
Town Planning Board on 24.3.2006

DRAFT TOWN PLANNING BOARD GUIDELINES  
FOR SUBMISSION OF VISUAL IMPACT ASSESSMENT TO  
TOWN PLANNING BOARD

TPB Paper No. 7541  
For Consideration by the  
Town Planning Board  
On 24.3.2006

**Draft Town Planning Board Guidelines  
for Submission of Visual Impact Assessment to Town Planning Board**

**1. Purpose**

This paper seeks Members' agreement to the captioned new set of Town Planning Board (TPB) Guidelines to guide submission of visual impact assessment (VIA) to TPB.

**2. Background**

- 2.1 Assessing the visual impact of development is important for creating a good quality environment. With the increasing public awareness of urban design, there is a need to ensure that visual impact of a proposed development is properly addressed and assessed to aid planning decision on the acceptability of the development in visual and environmental terms.
- 2.2 Currently, visual impact assessment (VIA) is one of the core components in environmental impact assessment (EIA) under the EIA Ordinance (EIAO). The guidance to carry out VIA for designated projects under EIAO has been long established and is set out in the Technical Memorandum on EIA Process. However, for VIA of planning proposals submitted to TPB under the Town Planning Ordinance, no formal guidelines have yet been available to guide VIA, and the approaches to and qualities of VIA submitted may vary from time to time. To this end, these guidelines are prepared to provide guidance and consistent reference for assessing visual impacts of development proposals submitted to TPB as may be required.

**3. The Guidelines to be Promulgated**

The new guidelines set out the scope and application, primary consideration, general

requirements and materials to be submitted for VIAs associated with s.16 or s.12A applications. A set of the draft guidelines is attached at **Annex A**.

#### 4. Comments from Relevant Government Departments

4.1 The draft guidelines were circulated to Buildings Department (BD), Architectural Services Department (ASD), and Housing Department (HD) on 6.3.2006. Their comments and PlanD's responses are summarised in **Annex B**. In essence, there is no objection to the implementation of VIA but HD considered that the guidelines should be simplified and better quantified to reduce subjectivity.

4.2 PlanD considers that visual impact is a psychological perception of the aesthetical quality of environment which cannot be quantified in the same manner as for other types of impact assessment e.g. traffic impact or noise impact assessment. It is not realistic to provide quantitative guidelines for VIA. Quantitative guidelines for VIA are also not available under EIAO. However, the guidelines would provide a consistent and systematic basis to facilitate both the applicants to explain and TPB to visualise the resultant spatial impact of development before making decisions.

#### 5. Decision Sought

5.1 The Board is invited to consider and agree on the draft Guidelines at **Annex A**.

5.2 Subject to Members' agreement, the Guidelines will be submitted to the Planning Sub-Committee of the Land and Building Advisory Committee before promulgation of the Guidelines.

#### Attachment

- Annex A Draft TPB Guidelines for Submission of VIA to the TPB  
 Annex B Summary of Government Departments' Comments and PlanD's Responses

Planning Department  
 March 2006

TPB PG-NO.

**GUIDELINES FOR SUBMISSION OF  
VISUAL IMPACT ASSESSMENT TO THE TOWN PLANNING BOARD**

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(Important Note :

The guidelines are intended for general reference only.

Any enquiry on this pamphlet should be directed to the Planning Information and Technical Administration Unit of the Planning Department, 17<sup>th</sup> Floor, North Point Government Offices, 333 Java Road, North Point, Hong Kong – Tel. No. 2231 5000.

The guidelines are subject to revision without prior notice.)

**1. Introduction**

1.1 From time to time, the processing of section 16 planning applications and section 12A applications for amendments of plans under the Town Planning Ordinance may involve submission of visual impact assessment (VIA). The main aim is to assess the potential visual impact of the proposed development to the surrounding areas, and present sufficient information to facilitate the Town Planning Board (TPB) to visualise the 3-dimensional impact of the proposed development in making a decision on the application. The purpose of these Guidelines is to provide guidance on the general requirements for preparing VIA submissions in support of section 16 or section 12A applications to the TPB.

1.2 The requirements specified in these Guidelines may not be exhaustive and are for general reference only. The level of details may be varied depending on individual cases. They are subject to revisions without prior notice.

**2. Scope and Application of VIA**

2.1 The general location, siting, nature, scale and distance to visually sensitive

receivers (VSRs) of a proposed development are primary factors for consideration of the need and scope for VIA. VIA is normally not required for applications not involving increase in existing building bulk or development scale intensification or which conform to development restrictions and will unlikely cause public concern. Developments which are subject to comprehensive planning and design control as required by planning briefs or master layout plans under leases or statutory plans, e.g. in "Comprehensive Development Area" or within or near landscape sensitive areas or visually sensitive areas, should normally require VIA.

- 2.2 Landscape sensitive area is area of high landscape value and sensitive to irreversible changes which cannot be easily restored to its current landscape character and conditions. These areas warrant special landscape treatment and may include areas zoned "Agriculture", "Coastal Protection Area", "Conservation Area", "Country Park", "Green Belt", "Open Space", "Recreation", "Site of Special Scientific Interest" and special zones in rural or suburban areas with intention of protection of rural character and ecological value (e.g. "Other Specified Uses" ("OU") annotated "Tourist Corridor", "OU(Rural Use)", "OU(Comprehensive Development and Wetland Enhancement Area" and "OU(Tourism and Recreation Related Uses)") as well as the Wetland Conservation Areas and Wetland Buffer Areas within Deep Bay Area as defined in TPB Guidelines No. 12B.
- 2.3 Visually sensitive area is area where, by nature of its location, topography, character, visual appearance, available views and wider setting or other special attributes, a development to be located within or near it may be out of context and alter the visual quality and views to or from the area currently being enjoyed by the public. These areas may include prime entry points to city, waterfront, hillside, green spaces, ridgeline, spur, fish ponds, country parks, streams and rivers, popular vantage points and major view corridors, scenic land/water routes, hiking trails, rural land, urban fringe, parkland, recreational ground, resort, landmark spaces, historical and heritage sites, conservation areas etc.
- 2.4 For other applications not mentioned above, or in case of doubt, the applicants may approach the relevant District Planning Offices on the need for VIAs for individual applications, in consultation with the Urban Design Unit of the Planning Department.

### 3. Primary Consideration of VIA

A development will bring about visual impact, be it positive or negative, as long as it is visible. Visual impact is a matter of degree of the visual perception of the outlook of development to the VSR. It can be psychological and subjective to different visual receivers. The primary town planning consideration of visual impact is not so much on the architectural design, façade treatment, colour, texture, materials and finishes of a building per se, but the overall layout, scale, form, massing and style on the visual backdrop and townscape. The foremost underlying principle would be to avoid adverse impact on the visual backdrop. When avoidance is not possible, the impact should be minimized with mitigation and enhancement measures. Alternative design options to achieve the best design with the least adverse visual impact should be thoroughly explored and reported.

### 4. General Requirements for VIA

4.1 The following information should be included in the assessment.

#### Assessment Area

4.2 The extent of the area for assessment should be identified at the outset. In general, the assessment area is the area where views and viewers may be affected. It should identify the visual envelope containing the proposed development wholly or partly visible to the visual receivers. Unobstructed fields of view without the proposed development from the visual receivers should be included in the visual envelope. Likewise, areas where views to the proposed development are substantially blocked by buildings, structures, vegetation or topography in between can be excluded.

#### VSRs

4.3 Within the assessment area, VSRs who would likely be affected by the proposed development should be identified. VSRs could be from static or mobile sources. They could include residents, tourists, workers, students, open space users, drivers, travellers and walkers. In general, only those VSRs who are currently, or planned to be, located on prominent sightlines to the proposed development would need to be included in the assessment.

Based on the identified VSRs, key viewpoints for assessing the visual impact of the proposed development should be selected. Selection of critical viewpoints which would represent the possible worst case scenario would be important. Public viewpoints should be given precedence over private viewpoints. The selected viewpoints should be agreed with the concerned District Planning Office in consultation with the Urban Design Unit prior to submission of the application for assessing the visual impact in case of doubt.

#### Visual Elements

- 4.4 Any visual attractors (e.g. natural coastline, mountain backdrop, woodland etc.) or detractors (e.g. pylons, sewage treatment, plant, refuse collection points, ventilation shaft buildings, quarry etc.) that currently exist or are being planned within the visual envelope should be identified. Visual elements may enhance, degrade, or neutralize the overall visual impact of the development being assessed.

#### Types of Visual Impact

- 4.5 The type of visual impact generated by a development may vary with different VSR groups. Visual impact may be due to visual incompatibility, intrusion or obstruction resultant from a development, and they are not necessarily mutually exclusive.
- 4.6 Visual impact could be analysed according to the following types:
- (a) visual compatibility with surroundings – e.g. massing, height, scale, form, style, character and distinctiveness of buildings. A building of good design can also create visual incompatibility and disharmony with the surroundings;
  - (b) visual intrusion – direct intrusion due to intrusive design of the proposed development itself or due to direct permanent loss of valued visual amenities and resources e.g. a development sited on a pleasant ridgeline or on a filled fish pond;

- (c) visual obstruction – e.g. complete or partial blocking of views and vistas, particularly towards prominent ridgelines, harbour, natural coastlines, open sea horizon or skyline, scenic backdrop, landscape features, landmarks, heritage sites and notable features to be preserved etc. A building of good design can also create visual obstruction; and
- (d) improvement of visual quality – e.g. clearance or screening of visual detractors or eyesore, special designs and enhancement measures that could mitigate or make positive contribution to the design of the development and its surrounding setting.

#### Visual Sensitivity

- 4.7 Different VSR groups would exhibit different visual sensitivity to a visual impact. For example, residents from home would normally be highly sensitive to developments within visible distance limiting their free views and having a substantial effect on the quality and character of views they are currently enjoying; while workers would be moderately sensitive to a visual impact when viewed from workplaces. For VSRs from mobile sources, e.g. travellers, the degree of sensitivity depends on their concentration to the activity they are undertaking and the duration of the view. Those who are taking leisure walk or leisure driving would be more sensitive to a visual impact than those travelling on express highways.
- 4.8 Factors that need to be taken into account for considering visual sensitivity would include availability and quality of existing views and alternative views, the distance of viewers to the proposed development and the number of locations of people affected, whether many, moderate or few. Visual sensitivity may be categorized as low, medium and high.

#### Magnitude of Change

- 4.9 The magnitude of change that the VSRs will experience should be assessed in a VIA. The magnitude of visual impact would normally relate to the scale/size of the development, the relativity of changes of appearance as a continuum before and after development, the visiblensness of the development in the presence of existing and planned developments and any visual

contrast created by the development within the field of views of the VSRs. The cumulative impact of all existing and planned developments in the surrounding areas of the application site known at the time of application should be taken into account. The impact of change may be positive or negative and of varying magnitude: small, intermediate or large.

Extent of Visual Impact

4.10 The extent or degree of visual impact is a function of the sensitivity of the affected VSRs and magnitude of change. Taking into account the visual sensitivity, magnitude of change and any design mitigation/enhancement measures, the extent of visual impact to each VSR group may be judged as negligible, slight, moderate or significant. For instance, a moderate impact can result from intermediate magnitude of change and medium sensitivity. The results can be presented in a tabular form.

Extent of Visual Impact for each VSR Group

Impact of Change	Magnitude of Change	Visual Sensitivity		
		Low	Medium	High
Positive				
Or Negative	Small	Negligible/Slight/Moderate/Significant (whichever is applicable)		
	Intermediate			
	Large			

Evaluation of Overall Visual Impact

4.11 The applicant should conclude the overall visual impact of a proposed development based on evaluation of the cumulative visual impact to all the identified VSR groups as mentioned in paragraph 4.9, and whether the impact is general or localised. The conclusion should be supported by reasoned judgment and accurate illustrative materials. The overall impact may be classified according to the following thresholds:

- (a) enhanced – if the proposed development in overall term will improve the visual quality and complement the visual character of its setting for most of the VSR groups;

- (b) partly enhanced/partly adverse – if the proposed development will exhibit enhanced visual effects to some VSR groups and at the same time exhibit adverse visual effects to some other VSR groups;
- (c) negligible – if the proposed development will in overall term have insignificant visual effects to most of the VSR groups, or the visual effects would be screened or filtered by other distracting visual elements in the visual envelope;
- (d) slightly adverse – if the proposed development will, with or without mitigation measures, result in overall term some negative visual effects to most of the VSR groups;
- (e) moderately adverse – if the proposed development will, with or without mitigation measures, result in overall term negative visual effects to most of the key VSR groups; and
- (f) significantly adverse – if the proposed development will in overall term cause serious and detrimental visual effects to most of the key VSR groups even with mitigation measures.

#### Design Concept and Mitigation/Enhancement Measures

4.12 A description on the recommended design concept and/or mitigation/enhancement measures, if any, adopted/incorporated in the design to address the visual impact should be provided in the submission, supported by illustrative materials and an implementation programme if applicable. Relevant information such as urban design guidelines in the Hong Kong Planning Standards and Guidelines, planning studies e.g. Study on Urban Design Guidelines for Hong Kong and Study on Landscape Value Mapping of Hong Kong, and statutory/non-statutory development plans should also be taken into account.

### **5. Materials to be Submitted**

5.1 The following materials should normally be included in the submission for the VIA:

- A plan showing the boundary of the assessment area, locations of the identified VSR groups and viewpoints and all the major visual elements within the visual envelope.
- Site photographs showing the existing conditions of the subject site.
- Site photographs showing the existing view(s) from the selected viewpoint(s) for each of the identified VSR groups without the proposed development.
- Photomontages showing the view to the proposed development from the selected viewpoint(s) for each of the identified key VSR groups. Information of the exact locations and angles from where the photos are taken, as well as the focal length used, for the photomontages, should also be provided.

5.2 The following materials may be required to support the VIA for more complex cases if considered appropriate:

- A physical model in the appropriate scale and size.
- Softcopy of photomontages, animation and/or digital model.
- Other supplementary materials such as drawings to show perspectives, cross-sections and elevations.

5.3 For submission of softcopy, both native digital model and the visualization outputs should be submitted in following formats:

- Native digital models should be in VIZ/MAX/DGN/DWG/VRML with both facades and depended files linked/attached properly; and
- Visualisation outputs should be in JPEG/BMP/TIFF formats with not less than 1024 x 1280 dpi for still images, and AVI/RM/WMV formats with not less than 720x480 dpi for animations.

- 5.4 For softcopy, the spatial data including viewpoints should be in HK1980 grid coordinate system and height attributes in Hong Kong Principal Datum. Description of the digital data employed including date of acquisition, original resolution and scale of site photos/aerial photos/satellite imagery/base maps, should also be provided where applicable.
- 5.5 Applicants should ensure that all the materials submitted are accurately presented.
- 5.6 Applicants are welcome to contact the concerned District Planning Office, who will be assisted by the Urban Design Unit of the Planning Department, for advice on supportive materials to be submitted in the VIA for any specific application.

6. **Enquiries and Advice**

Applicants may approach the Urban Design Unit of the Planning Department direct for general and non-site specific enquiries and advice if necessary on these Guidelines.

**TOWN PLANNING BOARD**  
**March 2006**

Summary of Government Departments' Comments and PlanD's Responses

Guidelines for Submission of Visual Impact Assessment to the Town Planning Board

Department	Comments	Responses
BD (CBS/HKW)	No comment as visual impact is primarily a planning matter outside the jurisdiction of the Buildings Ordinance.	Noted.
ASD (CA/ASC)	No comment in general except that it may be risky not to include architectural design in the primary town planning consideration of visual impact. For instance, a building with highly reflective curtain walls in countryside may post adverse visual impact.	It is agreed that architectural design may also have visual impact but PlanD has no expertise on architectural matter, including in particular, glare impact. We would rely on ASD to provide comments on these aspects which would be included in the TPB papers.
HD (Planning Section)	<p><b>I. General</b></p> <p>(1) No in-principle objection to implementation of a VIA.</p> <p>(2) The guidelines are too general and qualitative in nature. Their implementation might be fraught with difficulties and would likely lead to protracted arguments between the applicants and PlanD.</p> <p>(3) Suggest to simplify and provide better quantified guidelines to reduce the risk of subjective interpretation.</p>	<p>Noted.</p> <p>It is recognized that VIA is about aesthetics which inevitably involves subjective value judgment. Quantitative guidelines for VIA are not realistic and are also not available under EIAO. Stakeholders have in the past expressed concern that prescriptive quantitative guidelines to control urban design are too rigid. The guidelines provide a systematic process and consistent basis in carrying out and assessing VIA.</p> <p>The guidelines reflect the existing normal trades' practice for conducting VIA and are in fact simpler than the requirements for VIA under EIAO.</p>

Department	Comments	Responses
	<p>(4) VIA submitted under s.12A or s.16 application is normally conceptual. Rigid conditions imposed by TPB would unreasonably constrain the design and development and should be avoided.</p> <p>(5) The successful implementation of the guidelines would be predicated on their clarity, consistency and enforceability. Some of the key components of the proposed guidelines, in particular, assessment area, viewpoints and VSR, are so general that they would be open to subjective interpretation. The absence of clearly defined guidelines could and would lead to protracted debates and arguments. This could result in programme slippages and wasteful of valuable resources.</p> <p>(6) The requirements for supporting materials are exceptionally onerous, e.g. location plans, site photographs, photomontages, cross sections, physical models, animation etc and other details as may be required by PlanD and "They are subject to revisions without prior notice". These requirements could be expensive.</p>	<p>It is agreed that VIA submitted at the time of s.12A or s.16 applications would in general only be conceptual. The VIA would be based on the proposed development parameters and conceptual building masses submitted to TPB. Whether TPB would impose condition for further revised VIA would be up to TPB to decide. The applicant may ask for review of any condition under the Town Planning Ordinance if the applicant considers the condition unreasonable. Where there are major changes to the approved development scheme, which might in turn affect the VIA, the applicant would in any case be required to seek approval for amendment or submit a fresh application.</p> <p>The guidelines have provided guidance on the approach to undertake and assess AVA in a consistent and systematic manner. Each application site is different and it is not possible to have prescriptive and quantitative guidelines which are commonly applicable to all sites. It has to be stressed that VIA is about aesthetics which is different from TIA or noise impact assessment which can be quantified and there is no objective standard for measurement. Professional and reasoned judgment has to be exercised. Applicants are welcome to approach the subject DPO to discuss on the identification of assessment area, viewpoints or VSR before preparing submission to TPB.</p> <p>The materials to be submitted as laid down in the guidelines are <u>not all</u> necessary for each VIA. Para. 5.1 covers the normal basic requirements while para. 5.2 covers special additional requirements for more complex cases. Location plans, site photographs and photomontages have been commonly used for VIA and are not onerous. Waiving of some requirements is possible subject to discussions with the subject DPO as the</p>

Department	Comments	Responses
	<p>particularly for smaller developments.</p> <p>(7) The likely outcome from adoption of these guidelines is all s.12A and s.16 applications will require a VIA to be submitted irrespective of their size, scale or potential magnitude of problem..</p> <p>(8) There is no administrative mechanism in the guidelines for dispute resolution or to clarify divergent departmental views prior to TPB. What guarantees are there to ensure that such disputes would be resolved in an objective, professional and unbiased manner?</p> <p>(9) It is important that officers who will be responsible for vetting, commenting and imposing conditions on the proposed developments are in fact trained and qualified to deal with the highly subjective and abstract nature of the guidelines.</p>	<p>guidelines are for reference only. The note that the guidelines are subject to revisions without prior notice is a standard note in all existing TPB guidelines.</p> <p>Not correct. The guidelines have not stated or hinted that VIA would be required for all s.12A and 2.16 applications. Section 2 of the guidelines has set out the scope where VIA should normally apply and outside that scope, VIA would not be expected. The first sentence of para. 2.1 states "The general location, siting, nature, scale and distance to VSR of a proposed development are primary factors for consideration of the need and scope for VIA. As stated, normally, only developments which are subject to comprehensive planning and design control under planning briefs or MLPs under leases or statutory plans, or within or near landscape sensitive areas or visually sensitive areas should require VIA.</p> <p>The District Planning Conferences or CPLD are established administrative mechanism to discuss divergent departmental views prior to submission to TPB. In addition, informal working meetings with departments concerned and applicants have always been held to help streamlining matters.</p> <p>Noted. For conditions concerning VIA, ASD and seconded landscape architects in PlanD would provide professional assistance. In addition, strong visualisation techniques support from experienced architectural designers and graphic artists is available in-house to ensure that photomontages and animation are presented as accurately as possible to facilitate undistorted presentation of the visual impact for informed decision.</p>

Department	Comments	Responses
	<p><b><u>II. Specific</u></b></p> <p>(10) Para. 1.2 should be reworded to better delineate what "additional details may be <u>reasonably</u> required".</p> <p>(11) Para. 2.1 - what is meant by development restrictions, statutory or HKPSC?</p> <p>(12) Para. 2.2 and 2.3 - how is "near landscape sensitive areas or visually sensitive areas" defined? Can it be quantified to give it more certainty?</p> <p>(13) Section 3 - Even though the stated intent of the VIA "is not so much on the architectural design ...", layout, scale, form, massing and style are in fact architectural matters, requirements to submit such information could and would result in imposition of design limitations on the development</p>	<p>This paragraph is on introduction and not on requirements. The key message in this paragraph is only to tell readers that the guidelines are for reference and level of details may vary for individual cases to suit different site locations and characteristics.</p> <p>As the title of the guidelines can tell, the development restrictions mean development restrictions on statutory plans.</p> <p>See response to general comments. Common sense judgment has to be exercised. The bigger an object e.g. a mountain, the more visible it is even if it is very far away from the viewers. On the contrary, a small object e.g. a signboard at the same distance may not be visible to the viewers.</p> <p>The keyword is "not so much". Layout, scale, form, massing and style no doubt relate to architectural design but they are the basic information normally required for VIA. Applicants can submit amendments to approved development schemes or fresh applications to TPB if the designs deviate subsequently, and this applies irrespective of whether VIA is needed or not.</p>



## Responses

Department	Comments	Responses
	<p>indication of the mechanism and standard of assessment should be provided.</p> <p>(15) Section 5 - Two issues will require attention. First, the submission requirements are excessively onerous, e.g. a plan that shows the "locations of the identified VSR groups and viewpoints and all the major visual elements within the visual envelope" has to be submitted, to be supported by photographs, photomontages and possibly a physical model, animation, etc. Second, no allowance for exemption is specified. Most if not all Section 12A and Section 16 Applicants would be subject to the VIA requirement irrespective of their size, scale or potential magnitude of impact. Is it possible that exemptions could be made for minor applications, say a site that is 1 ha in size or less?</p>	<p>) )</p> <p>This is not correct. See response to general comment under para. 6. Not all applications would require VIA and so the issue of exemption does not arise. The arbitrary suggestion of 1 ha for exemption of VIA cannot be agreed as e.g. a hill top signboard occupying a site area less than 1 ha can still have significant visual impact.</p>

**Business Facilitation Advisory Committee  
Town Planning Task Force**

*Problems with Qualitative Guidelines –  
Draft Town Planning Board Guidelines for  
Submission of Visual Impact Assessment to TPB*

## **General Concerns**

Whenever a set of guidelines is promulgated, it often turns into a bible and the officer-in-charge will stick to it word for word. If descriptions are open-ended or qualitative, the officer-in-charge usually takes a very conservative interpretation which could become extremely subjective at times.

2. Visual Impact Assessments (VIA) are currently being carried out for sites which are located at visually sensitive areas e.g. waterfront, or areas which may affect the ridgeline, etc. Important vantage points are usually agreed with the Urban Design Section of Planning Department and photomontages/perspectives/sections etc. are produced to demonstrate the impact. There is no need to have yet another set of guidelines on this subject. The Draft TPB Guidelines for VIA is attached for your information.

## **Specific Concerns**

### Scope and Applications of VIA

- Definition of landscape sensitive areas is too wide covering “Agriculture”, “GB”, “Open Space”, “Recreation”, etc.
- Definition of visually sensitive areas is very loose, such as major view corridors, popular vantage points, hiking trail, urban fringe, etc.
- VIA may be required for all applications at the end of the day.

### Primary Consideration of VIA

The guidelines request that alternative design options to achieve best design with the least adverse visual impact should be thoroughly explored and reported. How much resources are expected to be spent on this? Visual impact is after all one factor of consideration in building design.

### Assessment Area

The assessment area is the area where views and viewers may be affected. How should one define “may be affected”? How far a viewer should be taken into account?

### Visually Sensitive Receivers (VSRs)

VSRs include all categories e.g. residents, workers, drivers, etc. If the officer-in-charge takes a conservation view, a great deal of resources will be required. Why should we not concentrate on permanent public viewpoints?

### Types of Visual Impact

Visual incompatibility – is our city only looking for homogeneity and mediocrity?

Visual intrusion, visual obstruction – what extent is unacceptable?

### Visual Sensitivity

Low, medium, high – too subjective

### Magnitude of Change

Small, intermediate, large – too subjective

### Extent of Visual Impact

Negligible, slight, moderate, significant – too subjective

### Evaluation of Overall Visual Impact

Cumulative visual impact to all identified VSR groups – over-simplification based on a series of subjective judgments and open to a lot of potential arguments.

### **For Discussion**

3. Should the Visually Sensitive Areas and Landscape Sensitive Areas be specifically identified followed by public consultation and clearly indicated on OZPs? Should VIAs be just required for such special areas?

4. Should permanent public views be the major consideration rather than private views or transient views?

5. Should assessment area be generally limited to area within 500m radius of the proposed development?
6. Should alternative designs not be required?
7. Should there be a Panel of Urban Design experts to judge on visual impact of special areas rather than relying on individual officers?

May 2006