

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

(Planning Application No. A/H11 /108)

Further Information No. 1

Appendix VIII

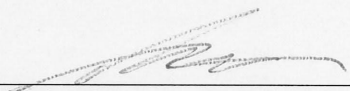
Revised Air Quality Impact Assessment

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and “Residential (Group C) 4” Zones at 1 & 1A Kotewall Road
and 64 Conduit Road, Mid-levels**

Air Quality Impact Assessment
(V2.0)

August 2026

Approved By


(Project Manager: K.S. Lee)

REMARKS:

The information supplied and contained within this report is, to the best of our knowledge, correct at the time of printing.

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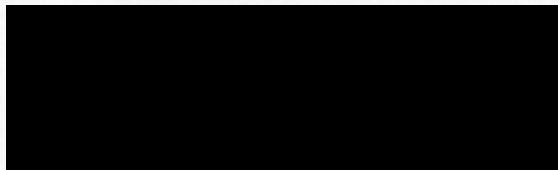


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1 INTRODUCTION

1.1 Background

- 1.1.1 The Project Proponents, Gainlong Limited and Honour Future Limited, has proposed a minor relaxation of the building height restriction for a permitted residential development in the “Residential (Group) B” and “Residential (Group C) 4” zones at 1 & 1A Kotewall Road and 64 Conduit Road, Mid-Levels.
- 1.1.2 Cinotech Consultants Limited has been commissioned by the Project Proponents to conduct an Air Quality Impact Assessment (AQIA) to evaluate the potential air quality impacts associated with the implementation of the Project and to recommend necessary air quality mitigation measures.
- 1.1.3 This AQIA has been prepared to support the application for planning permission to the Town Planning Board (TPB) under Section 16 of the Town Planning Ordinance (Cap. 131) for the proposed residential development involving relaxation of height restrictions.

1.2 The Application Site

The Application Site (the Site) is located in the Mid-Levels on Hong Kong Island. It has a total site area of approximately 1,674.6 m². The location of the Proposed Development is shown in **Figure 1-1**. The Site is surrounded by sloping terrain, with residential, G/IC, and open space zones in the vicinity, which tally with the Outline Zoning Plan (OZP) as shown in **Figure 1-2**.

1.3 The Proposed Development

- 1.3.1 The Proposed Development comprises two residential towers. The taller block (“Tower 1”) with 31 storeys and the lower block (“Tower 2”) with only 3 storeys. The notional layout of the Proposed Development is provided in **Appendix 1-1**, and the major development parameters are summarised in **Table 1-1**.
- 1.3.2 The expected population intake year of the Proposed Development is 2029.

Table 1-1 Development Parameters of the Proposed Development

Major Development Parameters	
Total Site Area	About 1,674.6m ²
Domestic Plot Ratio	5
Domestic GFA	8,373m ²
No. of Unit	46
Average Flat Size	About 182m ²
Maximum Building Height	Tower 1: Not more than +220.70mPD
	Tower 2: Not more than +143.66mPD
No. of Storeys	Tower 1: 31
	Tower 2: 3
Site Coverage	Not more than 33.3%
No. of Block	2
Private Open Space	Not less than 1m ² per person

2 LEGISLATION, STANDARDS & GUIDELINES

2.1.1 The air quality impact assessment criteria were made reference to the Hong Kong Planning Standards and Guidelines (HKPSG) and the Air Pollution Control Ordinance (Cap.311) (APCO).

2.2 Minimum Buffer Distances

2.2.1 HKPSG recommends minimum buffer distances from the various road emission sources, industrial chimney and various odour sources for planning purpose, which are summarized Table 2-1.

Table 2-1 Guidelines on Usage of Open Space Site

Pollution Source	Parameter	Buffer Distance	Permitted Uses
Road and Highways [i]	<i>Type of Road</i>		
	Trunk Road and Primary Distributor	>20m	Active and passive recreational uses
		3-20m	Passive recreational uses
		<3m	Amenity areas
	District Distributor	>10m	Active and passive recreational uses
		<10m	Passive recreational uses
	Local Distributor	>5m	Active and passive recreational uses
		<5m	Passive recreational uses
Industrial Area [ii]	<i>Difference in Height between Industrial Chimney Exit and the Site</i>		
	<20m	>200m	Active and passive recreational uses
		5-200m	Passive recreational uses
	20-30m	>100m	Active and passive recreational uses
		5-100m	Passive recreational uses
	30-40m	>50m	Active and passive recreational uses
		5-50m	Passive recreational uses
	>40m	>10m	Active and passive recreational uses
Odour Sources [iii]	<i>Type of Odour Sources</i>		
	Slaughterhouses (with Rendering Plant)	>300m	Sensitive uses and commercial areas
	Slaughterhouses (without Rendering Plant)	>200m	
	Small Scale Odour Sources, such as - Crematoria - Stock Wagon Washing Areas - Livestock Yards - Wholesale Fish and Poultry Markets	>200m	Sensitive uses
	Offensive Trades	>200m	Sensitive uses

Note:

[i] The buffer distance is the horizontal, shortest distance from the boundary of the industrial lot, the position of existing chimneys or the edge of road kerb, to the boundary of open space sites.

[ii] Refer to Table 3.1 of Chapter 9 of the HKPSG

[iii] Refer to Table 1.3 of Chapter 9 of the HKPSG

2.3 Air Quality Objectives (AQO)

2.3.1 The Air Pollution Control Ordinance (APCO) provides the statutory authority for controlling air pollutants from a variety of sources. The Hong Kong Air Quality Objectives (AQO) stipulate the maximum allowable concentrations over specific periods for the criteria pollutants (Table 2-2).

Table 2-2 Hong Kong Air Quality Objectives (2025)

Pollutant	Averaging time	Concentration limit ^[1] ($\mu\text{g}/\text{m}^3$)	Number of exceedances allowed per calendar year
Sulphur dioxide (SO_2)	10-minute	500	3
	24-hour	40	3
Respirable suspended particulates (RSP) ^[2]	24-hour	75	9
	Annual	30	Not applicable
Fine suspended particulates (FSP) ^[3]	24-hour	37.5	18
	Annual	15	Not applicable
Nitrogen dioxide (NO_2)	1-hour	200	18
	24-hours	120	9
	Annual	40	Not applicable
Ozone (O_3)	8-hour	160	9
	Peak season	100	Not applicable
Carbon monoxide (CO)	1-hour	30,000	0
	8-hour	10,000	0
	24-hours	4,000	0
Lead (Pb)	Annual	0.5	Not applicable

Note:

1. All measurements of the concentration of gaseous air pollutants, i.e., sulphur dioxide, nitrogen dioxide, ozone and carbon monoxide, are to be adjusted to a reference temperature of 293 Kelvin and a reference pressure of 101.325 kilopascal.
2. Respirable suspended particulates mean suspended particles in air with a nominal aerodynamic diameter of 10 μm or less.
3. Fine suspended particulates mean suspended particles in air with a nominal aerodynamic diameter of 2.5 μm or less.

2.4 Air Pollution Control (Construction Dust) Regulation

2.4.1 The regulation defines notifiable and regulatory works activities that are subject to construction dust control.

2.5 Air Pollution Control (Smoke) Regulations

2.5.1 The regulations stipulate that dark smoke emission from any chimney or relevant plant must not exceed 6 minutes in any period of 4 hours; or 3 minutes continuously at any one time.

2.6 Air Pollution Control (Fuel Restriction) Regulations

2.6.1 The regulation provides a statutory minimum requirement to restrict commercial and industrial processes to use ULSD (Ultra Low Sulphur Diesel) with a sulphur content of only 0.001%.

2.7 Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation

2.7.1 According to the regulation, Non-road Mobile Machinery (NRMMS) must adhere to the prescribed emission standards. Only NRMMS that have been approved or exempted and bear the appropriate label are permitted for use in specified activities and locations. These include

construction sites, container terminals and backup facilities, restricted areas of the airport, designated waste disposal facilities, and specified processes.

2.8 Recommended Pollution Control Clauses for Construction Contracts

- 2.8.1 This guideline includes a list of relevant regulations/guidelines for contractors and general engineering practices aimed at minimizing inconvenience and environmental nuisance to nearby residents and other sensitive receivers.

2.9 ProPECC Practice Note PN 2/96 - Control of Air Pollution in Car Parks

- 2.9.1 The practice note provides guidance on the control of air pollution in car parks including air quality guidelines required for the protection of public health; and factors that should be considered in the design and operation of car parks in order to achieve the required air quality.

3 BACKGROUND AIR QUALITY AND KEY CRITERIA POLLUTANTS

3.1 Background Air Quality

- 3.1.1 The EPD has been closely monitoring air quality in Hong Kong through its air quality monitoring stations (AQMS). The Central/Western AQMS is the closest station to the Site, while the nearest roadside station is located in Central. It is important to note that the Site is located in Mid-Levels, which is far away from the major road traffic. Therefore, measurements at the roadside station are not considered as representative.
- 3.1.2 The monitoring results at the Central/Western Air Quality Monitoring Station from 2021 to 2025 are summarized in Table 3-1. The measured concentrations of NO₂/RSP/FSP maintained a relatively stable level from 2021 to 2025, aside from the annual average FSP concentration, which showed a decreasing tendency.
- 3.1.3 The parameter of particular concern in recent years has been the annual average FSP concentration, which exceeded the AQO criterion in 2021. Although ozone concentrations also exceeded AQO criteria in 2022 and 2024, ozone is not considered a key criteria pollutant for the Proposed Development, as discussed in Section 3.7.

Table 3-1 Average Concentrations of Pollutants in the Recent Five Years (Year 2020 - 2024) at Central/Western Air Quality Monitoring Station

Pollutant	Averaging Time	AQO [i]	Pollutant Concentration (µg/m ³) [ii]				
			2021	2022	2023	2024	2025
Respirable Suspended Particulates (RSP)	10th Highest 24-hour	75 (9)	65	52	53	62	60
	Annual	30	26	22	22	24	24
Fine Suspended Particulates (FSP)	19th Highest 24-hour	37.5 (18)	34	33	29	35	30
	Annual	15	16	14	14	14	13
Nitrogen Dioxide (NO ₂)	19th Highest 1-hour	200 (18)	149	142	142	130	150
	10th Highest 24-hour	120 (9)	75	62	62	63	73
	Annual	40	33	30	32	32	31
Sulphur Dioxide (SO ₂)	4th Highest 10-Min	500 (3)	51	62	36	22	64
	4th Highest 24-hour	40 (3)	10	7	7	7	9
Ozone (O ₃)	10th Highest 8-hour	160 (9)	155	197	153	157	153
	Peak season	100	92	101	90	100	95
Carbon Monoxide (CO)	1st Highest 1-hour	30000 (0)	-	-	-	-	-
	1st Highest 8-hour	10000 (0)	-	-	-	-	-
	1st Highest 24-hour	4000 (0)	-	-	-	-	-

Note:

[i] The numbers in brackets () refer to number of exceedances allowed per calendar year.

[ii] The pollution concentrations are obtained from the Smart Air Modelling Platform v2.1.

[iii] Exceedances has been highlighted in orange.

[iv] Measurement data of Carbon Monoxide is not available for the Central/Western AQMS.

3.2 PATH Background

3.2.1 PATH is a regional-scale air quality model developed by the EPD to predict the future air quality of Hong Kong. Considering the decreasing trend in background air pollutant concentrations, the year with the worst PATH background during the operation of the Proposed Development is expected to be the planned completion year (2029). The PATH background for the year 2029 is representative of the operational phase of the Proposed Development.

3.2.2 The PATH v3.0 grids corresponding to the Site are [37,29], as shown in **Figure 3-1**. **Table 3-2** presents the predicted background air quality for the 500 m Assessment Area (Grids [37,29], [37,30], and [38,29]) for the year 2029.

3.2.3 Generally, the PATH background for the Site and adjacent areas in 2029 meets the relevant Air Quality Objectives (AQOs) with a significant margin, except for ozone concentrations.

Table 3-2 Background Ground Level Air Quality of PATH on Year 2029

Pollutant	Averaging Time	AQOs [$\mu\text{g}/\text{m}^3$] [i]	PATH Model Concentration [$\mu\text{g}/\text{m}^3$] on Year 2029		
			Grid [37,29] L1 (0-17m)	Grid [37,30] L1 (0-17m)	Grid [38,29] L1 (0-17m)
Respirable Suspended Particulates (RSP)	10th Highest 24-hour	75 (9)	58.39	57.62	58.82
	Annual	30	21.62	21.37	22.24
Fine Suspended Particulates (FSP)	19th Highest 24-hour	37.5 (18)	35.56	33.90	35.71
	Annual	15	13.74	13.50	14.26
Nitrogen Dioxide (NO ₂)	19th Highest 1-hour	200 (18)	88.41	102.28	91.12
	10th Highest 24-hour	120 (9)	35.73	46.10	35.81
	Annual	40	17.84	23.87	19.75
Sulphur Dioxide (SO ₂)	4th Highest 10-Min	500 (3)	24.61	24.69	23.93
	4th Highest 24-hour	40 (3)	7.39	7.49	7.41
Ozone (O ₃)	10th Highest 8-hour	160 (9)	172.74	174.71	176.11
	Peak season	100	117.03	116.90	117.71
Carbon Monoxide (CO)	1st Highest 1-hour	30000 (0)	619.94	618.04	620.08
	1st Highest 8-hour	10000 (0)	576.93	576.56	586.76
	1st Highest 24-hour	4000 (0)	556.21	559.53	564.76

Note:

[i] The numbers in brackets () refer to number of exceedances allowed per calendar year.

[ii] The pollution concentrations are obtained from the Smart Air Modelling Platform v2.1.

[iii] Exceedance has been highlighted in orange.

3.3 Existing Environment in the Vicinity

- 3.3.1 A desktop study, along with two site surveys, was conducted to assess the existing environment in the vicinity and evaluate potential air quality issues.
- 3.3.2 The first survey was conducted on 18 April 2026 (Saturday) from 10:30 to 13:30. During the survey, the weather was sunny, with a temperature of approximately 27°C and relative humidity of around 67%.
- 3.3.3 The second survey was conducted on 25 April 2026 (Saturday). During the survey, the weather was partially cloudy, with temperatures ranging from 21°C to 25°C and relative humidity ranging from 71% to 92%.

Existing Developments

Industrial Chimneys

- 3.3.4 The existing developments in the vicinity are primarily residential. Based on the desktop study and the site surveys, no active industrial chimneys were identified within 200 m of the site boundary.
- 3.3.5 Active chimneys were only identified at locations more than 200 m away from the Site, including at Tsan Yuk Hospital and Tung Wah Hospital, as shown in **Figure 3-2**.

Refuse Collection Point

- 3.3.6 There are two semi-open public refuse collection points (RCPs) in the vicinity of the Site which are considered potential odour sources.
- 3.3.7 The first is located along Kotewall Road, approximately 120 m to the west of the Site. The second RCP is located along Lyttelton Road, approximately 95 m to the northwest of the Site. The locations of both RCPs are marked in **Figure 3-3**.
- 3.3.8 During the site surveys, both RCPs were found to be clean and tidy. No noticeable odour was detected in front of the RCPs. The odour survey routes are indicated in **Figure 3-3**.
- 3.3.9 Therefore, neither RCP is regarded as an odour source.

Open Channel

- 3.3.10 There is an open channel approximately 10 m to the north of the Site. The locations of the open channel approximately is marked in **Figure 3-3**.
- 3.3.11 As odour could arise from polluted water in the channel, the open channel is considered a potential odour source. Considering the gradient of the channel is approximately 1:4, the accumulation of polluted water is unlikely.
- 3.3.12 During the site surveys, no accumulation of water was identified. In addition, no noticeable odour was detected at the nearby locations along Kotewall Road and Lyttelton Road, or along the adjacent green slope. The odour survey routes are indicated in **Figure 3-3**. Therefore, the open channel is not regarded as an odour source.

Air Sensitive Receivers (ASRs)

- 3.3.13 The Site is primarily surrounded by existing residential developments. All of these residential developments are considered Air Sensitive Receivers (ASRs) during the construction phase of the Proposed Development.

Road Traffic

- 3.3.14 The Site is bounded by Kotewall Road & Robinson Road to the north and Conduit Road to the south. According to the Annual Traffic Census 2024 (ATC 2024) by the Transport Department, both Kotewall Road (Station 1643) and Conduit Road (Station 1105) are Local Distributors. The Robinson Road section near the Site is also a Local Distributor according to the reply from the Transport Department in response to our inquiry (**Appendix 3-1**).

- 3.3.15 There is a private access road serving 64–70 Conduit Road, which adjoins the south-western boundary of the Site. Considering it is a private access road with minimal traffic volume, no adverse air quality impact arising from this access road is anticipated.

3.4 Identified Concurrent Projects

- 3.4.1 A concurrent project in the vicinity has been identified. The details are provided in **Section 4.3**.

3.5 Key Sources of Potential Air Quality Impact

- 3.5.1 In the absence of industrial chimney emissions and odour sources within 200 m from the application boundary, as stated in **Section 3.3**, road traffic emissions are the only key source of air pollutants in the vicinity that requires assessment.

3.6 Identification of Key Criteria Pollutants – Construction Phase

- 3.6.1 The construction dust is identified as the key criteria pollutant during constructed phase. The details are provided in **Section 4.3**.

3.7 Identification of Key Criteria Pollutants – Operation Phase

Sulphur Dioxide (SO₂)

- 3.7.1 In Hong Kong, Sulphur Dioxide (SO₂) is primarily from the combustion of Sulphur-containing fossil fuels in power stations and marine vessels.
- 3.7.2 The Air Pollution Control (Fuel Restriction) Regulations restrict commercial and industrial processes to use ULSD with a sulphur content of only 0.001%. In December 2007, the Government offered a concessionary duty rate for Euro V diesel for motor vehicles which has a sulphur content of 0.001%. Since then, all petrol filling stations in Hong Kong provide only Euro V diesel, which has a sulphur content of 0.001%. Reference to the **2024 Hong Kong Emission Inventory Report¹**, SO₂ emission from the road traffic contribute less than 1% of the total SO₂ emissions, thus SO₂ from road traffic emissions is not considered as key air pollutant.

¹ 2024 Hong Kong Emission Inventory Report
https://www.epd.gov.hk/epd/sites/default/files/epd/2024EmissionInventoryReport_Eng_final.pdf

Particulates (RSP & FSP)

- 3.7.3 The emission source during the operational phase of the Project would be the vehicular emission on the roads.

Nitrogen Dioxide (NO₂)

- 3.7.4 NO₂ could be emitted directly via combustion, or generated from the reaction between nitrogen oxides (NO_x) and ozone (O₃).
- 3.7.5 The major emission source of NO_x and NO₂ during the operational phase of the Proposed Development would be the vehicular emission on the roads.

Ozone

- 3.7.6 Ozone (O₃) is formed from dioxygen by the action of ultraviolet light and also atmospheric electrical discharges. It is not a primary pollutant emitted from vehicular emission thus is not considered as key criteria pollutants for the Project.

Carbon Monoxide

- 3.7.7 Road transportation is the dominant source of CO emissions. However, considering the low CO concentration measured in the air quality monitoring station (**Table 3-1**) as compared to the respective AQO criteria, the emission of CO from road transportation is unlikely to cause a significant air quality impact to the Proposed Development.

Lead

- 3.7.8 Leaded petrol has been banned in Hong Kong since 1999. It is not considered concerned pollutants for vehicular emission.

Odour

- 3.7.9 No odour sources in **Table 2-1** were identified within the 200m buffer zone.
- 3.7.10 Potential odour sources, such as RCPs and an open channel, have been identified in the vicinity of the Proposed Development. However, these are not regarded as odour sources due to their existing conditions; thus, odour is not considered a key criterion pollutant for the Project.

Summary

- 3.7.11 During the operation phase, the primary sources of pollutants will be traffic emissions, specifically NO₂, RSP, and FSP. These pollutants have been identified as the key criteria pollutants for the project's operation.

4 CONSTRUCTION PHASE AIR QUALITY IMPACT ASSESSMENT

4.1 Dust Source of the Project

- 4.1.1 Major dust-emitting construction activities will include the demolition of existing structures, excavation for basement construction, foundation works, and other construction activities (e.g., superstructure construction). A summary of the construction works is provided in **Table 4-1**.
- 4.1.2 Due to the small site area (approximately 1,674.6 m²), the scale of construction activities for the Project will be limited.
- 4.1.3 The demolition work for the northern half of the Site had been completed by the time this report was drafted (April 2026). It is important to note that a basement will only be provided in the northern portion of the Site. In addition, the basement is, in fact, on the same level as the adjacent road (Kotewall Road). Therefore, only limited excavation is needed for foundation works.
- 4.1.4 This is expected to generate approximately 9389.3 m³ of construction and demolition (C&D) material (calculated as 1,067.6 m² x 5 m + 607 m² x 2 m) from excavation & foundation works, 837.3 m³ (calculated as 8,373 m² x 0.1 m³/m²) from superstructure construction, and 2000 m³ from demolition (rough estimation). The maximum number of pieces of Powered Mechanical Equipment (PME) anticipated to be deployed at the worksite is 10, excluding smaller equipment such as water pumps and fans.

Table 4-1 Summary of the Construction Works

Site Area (m ²)	Structures to be demolished	Excavating for Basement	Construction of Superstructure	Number of Concurrent PME [1]
~1,674.6	Yes	Yes	Yes	10

Note:

[1] Excluding small plants such as water pump and fan. Estimated numbers based on projects in similar scales.

4.2 Air Sensitive Receivers in the Vicinity

- 4.2.1 The representative ASRs for the construction phase of the Proposed Development are illustrated in **Figure 4-1** and listed in **Table 4-2**.

Table 4-2 Representative Air Sensitive Receivers (Construction Phase)

ID	Building/Location	Type	Building Height (mPD) ^[1]	Horizontal Distance from Application Site Boundary (m) ^[2]
ASR01	Imperial Court Block A	Residential	161	< 5
ASR02	Peace Court	Residential	157	< 5
ASR03	King's Garden	Residential	155	< 5
ASR04	Villa Veneto	Residential	222	< 5
ASR05	Richmond Court	Residential	158	< 5
ASR06	West End Park Sub-station	G/IC	118	10
ASR07	Fairview Mansion	Residential	150	31
ASR08	London Court	Residential	219	36
ASR09	41B Conduit Road	Residential	170	58
ASR10	Haddon Court	Residential	189	67
ASR11	Serene Court	Residential	201	78

ID	Building/Location	Type	Building Height (mPD) ^[1]	Horizontal Distance from Application Site Boundary (m) ^[2]
ASR12	St. Stephen's Girls' College June Li Building	School	98	105
ASR13	St. Stephen's Girls' College Tsu Ta Tung Memorial Building	School	107	102

Note:

[1] Extracted from Open3Dhk.

[2] Estimated from the building footprint derived from the Digital Topographic Map iB1000.

4.3 Identification of the Major Pollutant Sources and of Potential Impacts

Emission from PME & Non-road Mobile Machinery

4.3.1 The operation of Powered Mechanical Equipment (PME) during construction work would emit gaseous air pollutants, such as nitrogen dioxide (NO₂), due to fuel combustion. Several types of Powered Mechanical Equipment, such as excavators, can be utilized for the construction works at the Site. However, the number of PME expected to be used on-site will be limited to a maximum of 10. As a result, no significant impact is anticipated from the operation of PME.

4.3.2 According to the Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation, only approved or exempted Non-Road Mobile Machinery (NRMM) with proper labelling are allowed to be utilized in the construction site. Supportive information and documents, such as third-party emission certificates, model and serial numbers of machines and engines, will be provided to the EPD to demonstrate that the concerned NRMM complies with the prescribed emission standards. As a result, no significant impact is anticipated from the operation of NRMM.

Construction Dust

4.3.3 Fugitive dust will be generated during the construction phase, with the primary air pollutants of concern being Respirable Suspended Particulates (RSP) and Fine Suspended Particulates (FSP) resulting from the Project's construction activities. Sources of dust during construction phase include demolition, foundation and superstructure construction activities, as well as handling and transportation of temporary stockpiles, dusty material, excavated material and concrete production. Additionally, particulates emitted from plant equipment could pose a concern if not properly mitigated. The exposed earth after the completion of work may also serve as a potential dust source.

4.3.4 The major sources of dust during the construction phase of this Project will be the demolition & foundation works. Despite the small scale of the works, mitigation measures will be necessary to minimize the potential impacts arising from these activities.

4.3.5 The movement of dump trucks is also considered a significant potential dust source if not properly mitigated. A rough estimate indicates that approximately 5 trips per day will be required.

4.3.6 In accordance with the Air Pollution Control (Construction Dust) Regulation, contractors and site agents are obligated to inform the EPD and implement dust reduction measures to minimize dust emissions throughout construction phase, including demolition, site formation, foundation construction, and superstructure construction.

Construction Gaseous Emission

- 4.3.7 The operation of Powered Mechanical Equipment (PME) and/or Non-Road Mobile Machinery (NRMMS) during construction work would emit particulates and gaseous air pollutants, such as nitrogen dioxide (NO₂), due to fuel combustion. Similarly, the movement of construction vehicles, such as dump trucks and concrete mixer lorries, would also emit particulates and gaseous air pollutants from fuel burning.
- 4.3.8 Emission of dark smoke is regulated by Air Pollution Control (Smoke) Regulations. By providing routine maintenance and using of ULSD, the potential impact can be significantly controlled.
- 4.3.9 According to Air Pollution Control (Non-road Mobile Machinery) (Emission) Regulation, only approved or exempted Non-Road Mobile Machinery (NRMM) with a proper label are allowed to be used in specified activities and locations including construction sites. Supportive information and documents (e.g. third-party emission certificates, model and serial numbers of machines and engines, etc.) for each NRMM would be provided to EPD to prove that the concerned NRMM is in line with the prescribed emission standards.
- 4.3.10 As only limited number of PME, NRMMS and/or construction vehicles are expected to be used on-site due to the small site area (~1,633 m²), and the PME and/or NRMMS are required to fulfil the relevant emission standards. As a result, no adverse impact is anticipated.

Concurrent Projects

- 4.3.11 A concurrent project in the vicinity has been identified. The development at 105 Robinson Road is located approximately 120 m to the east of the Site. The location of the identified concurrent project is marked in **Figure 4-2**.
- 4.3.12 Details of the development at 105 Robinson Road are not available. Based on the site surveys conducted in April 2026, the buildings at 105 Robinson Road have already been demolished. Therefore, the foundation and superstructure works for the development at 105 Robinson Road are likely to overlap with the construction programme of the Proposed Development under this S.16 application.
- 4.3.13 Provided that the proposed mitigation measures are effectively implemented, the construction dust generated by the Proposed Development is expected to be suppressed to a level that will not adversely impact the Air Sensitive Receivers (ASRs) in the vicinity. Therefore, no adverse cumulative air quality impacts are anticipated, assuming proper implementation of the proposed mitigation measures.

4.4 Mitigation Measures

- 4.4.1 Dust control measures under the Air Pollution Control (Construction Dust) Regulation (Cap. 311R) and good site practice shall be implemented to mitigate dust impact arising from construction works by preventing dust generation and/or by screening, suppressing and removing dust generated:
- Enclose the whole wall of the building to a height of at least 1m higher than the highest level of the structure to be demolished with impervious dust screens or sheeting on façade abutting or fronting upon a street
 - Existing structures are proposed to be demolished by non-percussive equipment such as hydraulic crusher to reduce dust emission; no blasting will be involved.

- Water or a dust suppression chemical shall be sprayed immediately prior to, during and immediately after demolition/excavation works
 - Cover stockpile or dusty materials with tarpaulin to prevent wind erosion
 - Any dusty materials remaining after a stockpile is removed shall be wetted with water and cleared from the surface of roads or streets
 - Every vehicle shall be washed to remove any dusty materials from its body and wheels before leaving the construction site
 - Where a vehicle leaving a construction site is carrying a load of dusty materials, the load shall be covered entirely by clean impervious sheeting to ensure that the dusty materials do not leak from the vehicle
 - Store cement bags in shelter with 3 sides and the top covered by impervious materials if the stack exceeds 20 bags
 - Maintain a reasonable height when dropping excavated materials to limit dust generation
 - Limit vehicle speed within Site to 10 km/h and confine vehicle movement in haul road
 - Minimize exposed earth after completion of work in a certain area by hydroseeding, vegetating or soil compacting
 - Cover materials on trucks before leaving the Site to prevent dropping or being blown away by wind
 - Regular maintenance of plant equipment to prevent black smoke emission
 - Throttle down or switch off unused machines or machine in intermittent use
 - Plan the Site layout so that machineries, dust causing activities and stockpilings are away from receptors as far as possible.
 - Site hoarding higher than 2.4m should be implemented where there are receptors at close proximity to the construction site and dusty activities.
 - Haul road shall be away from the project boundary as much as possible
- 4.4.2 No adverse air quality impact on the surrounding air sensitive receivers (ASRs) is expected with proper implementation of mitigation measures.
- 4.4.3 It should be noted that St. Stephen's Girls' College is located approximately 100m to the north of the Site. Dusty works near the schools are suggested being arranged in non-school hours as far as practicable. The project team is also recommended to communicate with the school, and keep school management informed of any possible impacts in advance.
- 4.4.4 Considering the proximity of the ASRs, regular site audit is recommended during the construction phase of the Proposed Development.

5 OPERATION PHASE AIR QUALITY IMPACT ASSESSMENT

5.1 Operation of the Proposed Development

Air Pollutant Emission from the Proposed Development

- 5.1.1 The Proposed Development is for residential purposes only. No chimney emissions from the Proposed Development or other industrial emissions are anticipated.

Air Sensitive Receivers (ASRs)

- 5.1.2 The lobby, clubhouse and residential flats of the Proposed Development are designated as Air Sensitive Receivers (ASRs) during the operational phase. Whereas the lobby and clubhouse will rely on central air-conditioning under the current plan, which is subject to detailed design, the residential flats will rely on openable windows for ventilation.

- 5.1.3 Therefore, it is necessary to confirm the suitable locations for openable windows and fresh air intakes.

5.2 Buffer Distance Recommended by HKPSG

- 5.2.1 The suggested buffer distances from the Hong Kong Planning Standards and Guidelines (HKPSG) outlined in **Table 2-1** shall be adhered to in order to avoid potential air quality impacts.

- 5.2.2 The Site is bounded by Kotewall Road & Robinson Road to the north and Conduit Road to the south, which are classified as Local Distributors. A buffer distance of 5 meters is required, as illustrated in **Figures 5-1a to 5-1c**.

- 5.2.3 Since the fresh air intakes of the lobby and clubhouse, as well as the windows of the residential flats of the Proposed Development, are outside the buffer region for road emissions, and no active industrial chimneys were identified within the 200 m, no adverse air quality impacts arising from road traffic emissions and industrial chimneys during the operation of the Project are anticipated. Therefore, vehicular emissions and industrial chimney emissions are not expected to constrain the Proposed Development, including the locations of openable windows and fresh air intakes during the operational phase.

5.3 Provision of Carparks

- 5.3.1 It should be noted that there are car parking spaces on the G/F and LG1/F of the Proposed Development.
- 5.3.2 The project team is reminded to fulfill the requirements regarding the design, maintenance, and operation of the ventilation systems as stipulated in ProPECC PN 2/96 – Control of Air Pollution in Car Parks. Additionally, the exhaust outlet for the car park should be located as far away as possible from nearby ASRs and/or fresh air intakes to avoid causing any potential air pollutant nuisance.
- 5.3.3 With proper car park design, no adverse air quality impacts to or from the car parking spaces during the operational phase are anticipated.

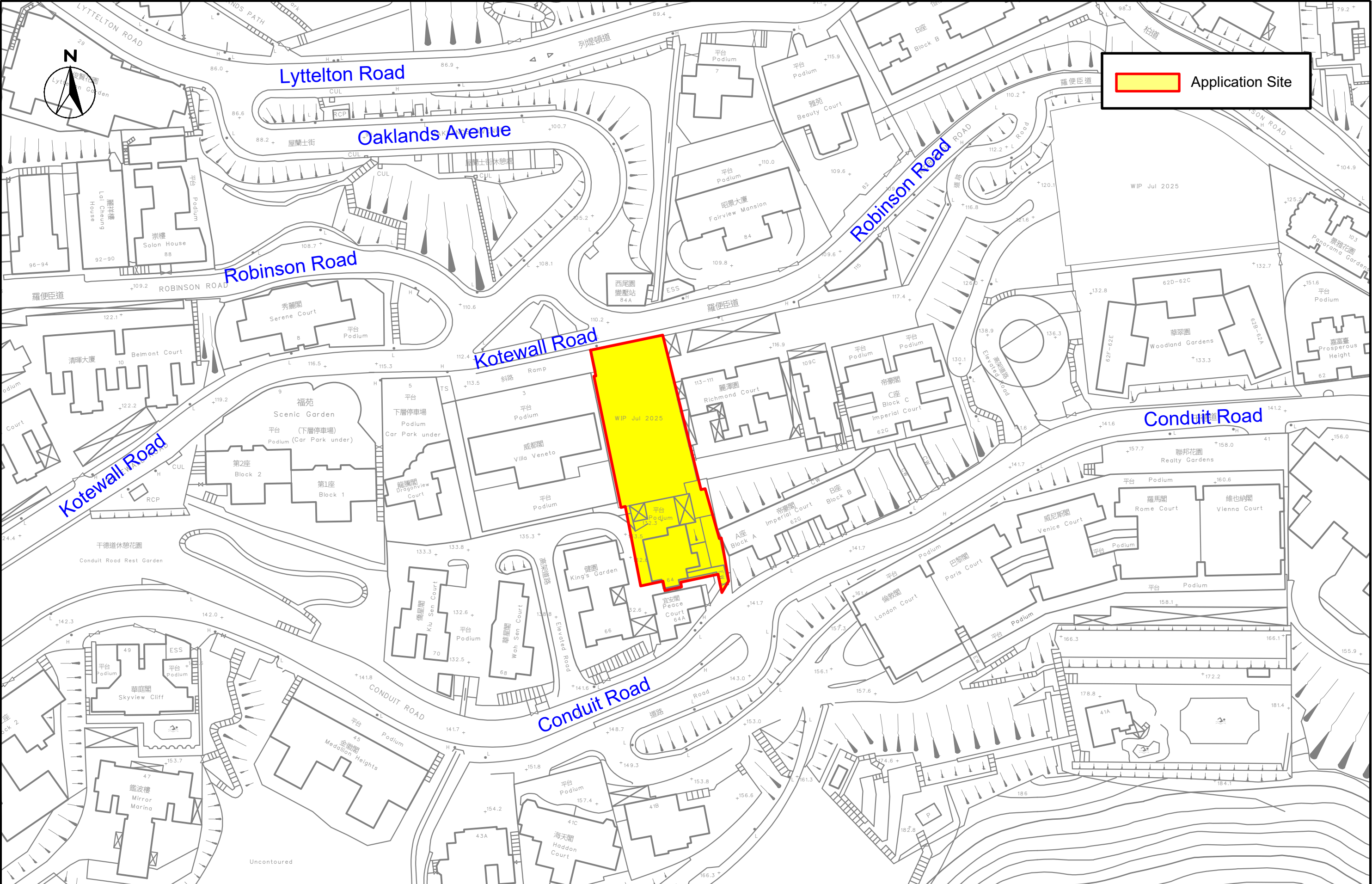
5.4 Odour Impact

- 5.4.1 Three potential odour sources were identified in the vicinity of the Proposed Development, including two nearby RCPs and an open channel, as illustrated in **Figure 3-3**.
- 5.4.2 During the site surveys conducted on 18th April 2026 and 25th April 2026 (see **Section 3.3**), no noticeable odour was detected near the RCPs or the open channel. The RCPs were clean and tidy, and no accumulation of water was identified in the open channel during the surveys. Therefore, these are not considered odour sources in this assessment.
- 5.4.3 Consequently, no adverse odour impact arising from the two nearby RCPs or the open channel is anticipated.

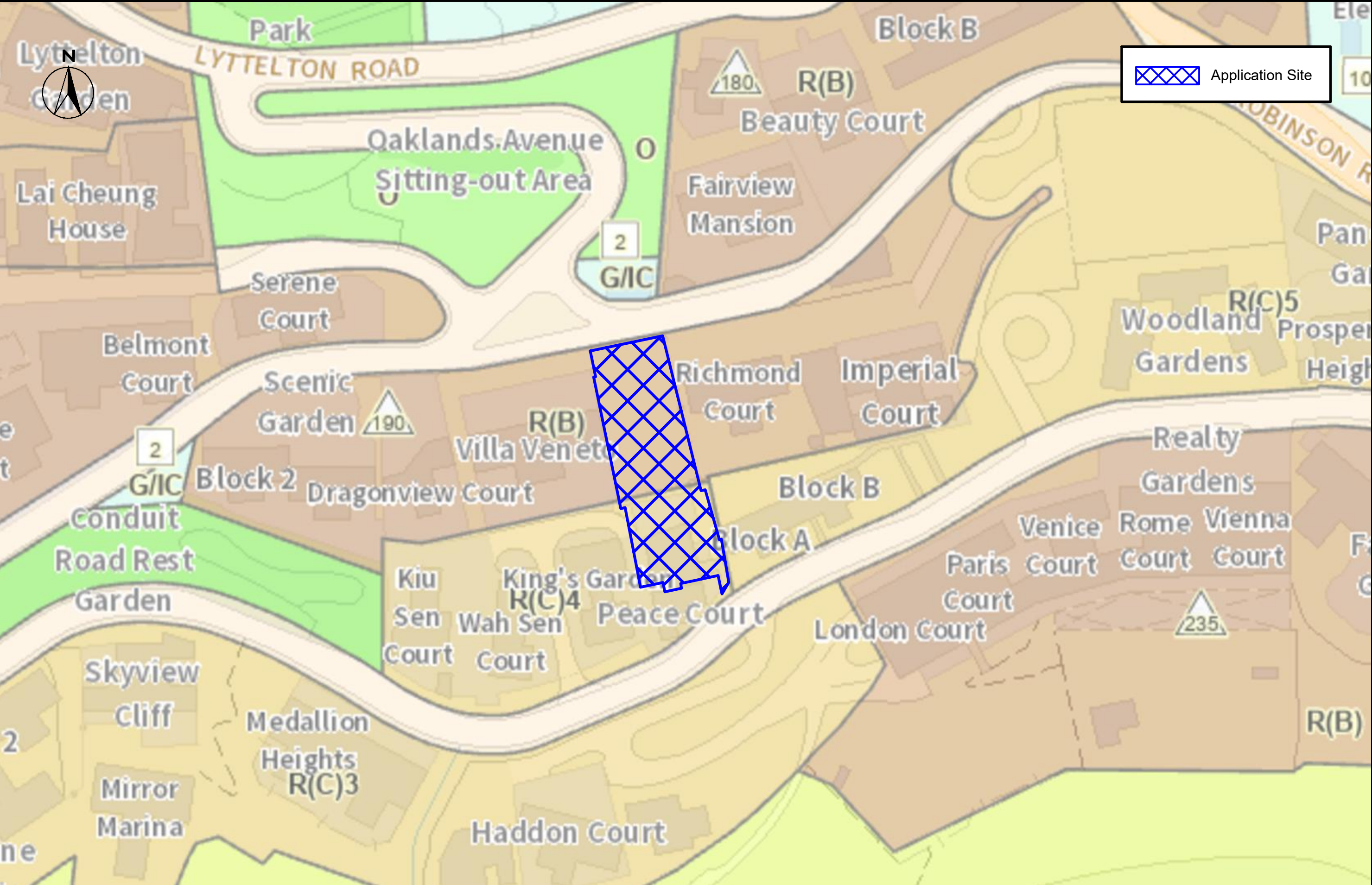
6 CONCLUSION

- 6.1.1 The air quality impact from the construction of the Proposed Development on the surrounding area, as well as the impact from the surrounding area on the proposed development, has been assessed.
- 6.1.2 With the implementation of air quality control measures outlined in the Air Pollution Control (Construction Dust) Regulation, the Air Pollution Control (Smoke) Regulation, the Air Pollution Control (Fuel Restriction) Regulations, and the Air Pollution Control (Non-Road Mobile Machinery) (Emission) Regulation, along with adherence to good site practices, no adverse air quality impacts associated with the construction works of the Proposed Development are expected.
- 6.1.3 The suggested buffer distances for road traffic emissions and industrial chimney from the Hong Kong Planning Standards and Guidelines have been fulfilled. Therefore, vehicular emissions and industrial chimney emissions are not expected to constrain the Proposed Development during operation phase.
- 6.1.4 Car parking spaces in the Proposed Development will be provided in accordance with the requirements stipulated in Control of Air Pollution in Car Parks (ProPECC PN 2/96). The car park exhaust outlets are recommended to be located as far away as possible from nearby Air Sensitive Receivers and/or fresh air intakes to avoid causing any potential air pollutant nuisance. With proper car park design, no adverse air quality impacts to or from the car parking spaces during the operational phase are anticipated.
- 6.1.5 No noticeable odour was identified near the two nearby RCPs and an open channel. Considering the gradient of the channel, the future accumulation of polluted water is unlikely. The management of the RCPs is also expected to remain consistent with existing conditions. Therefore, no adverse odour impact arising from the two nearby RCPs and an open channel is anticipated.

FIGURES



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		REV	1





[36,30]

[37,30]

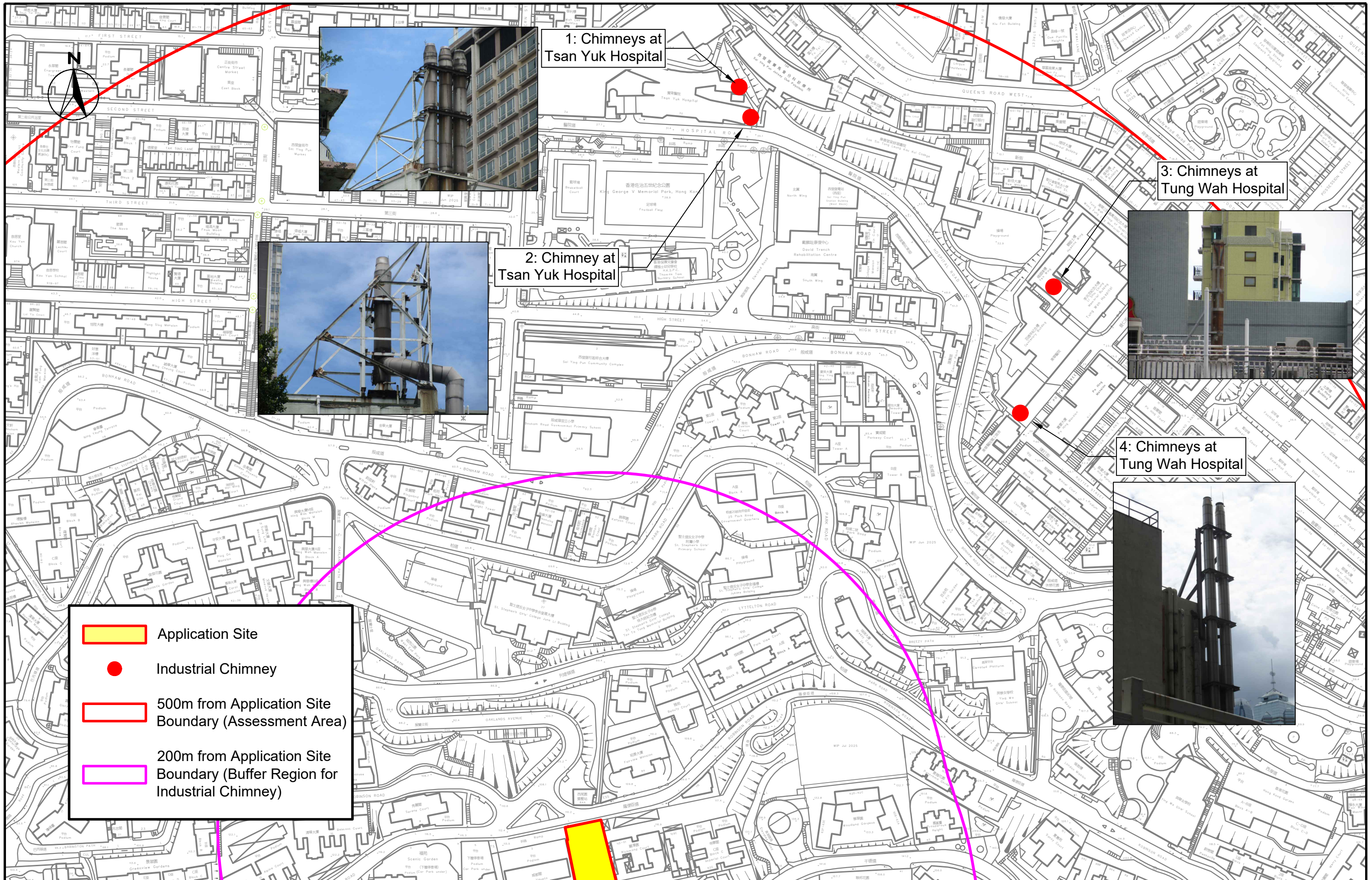
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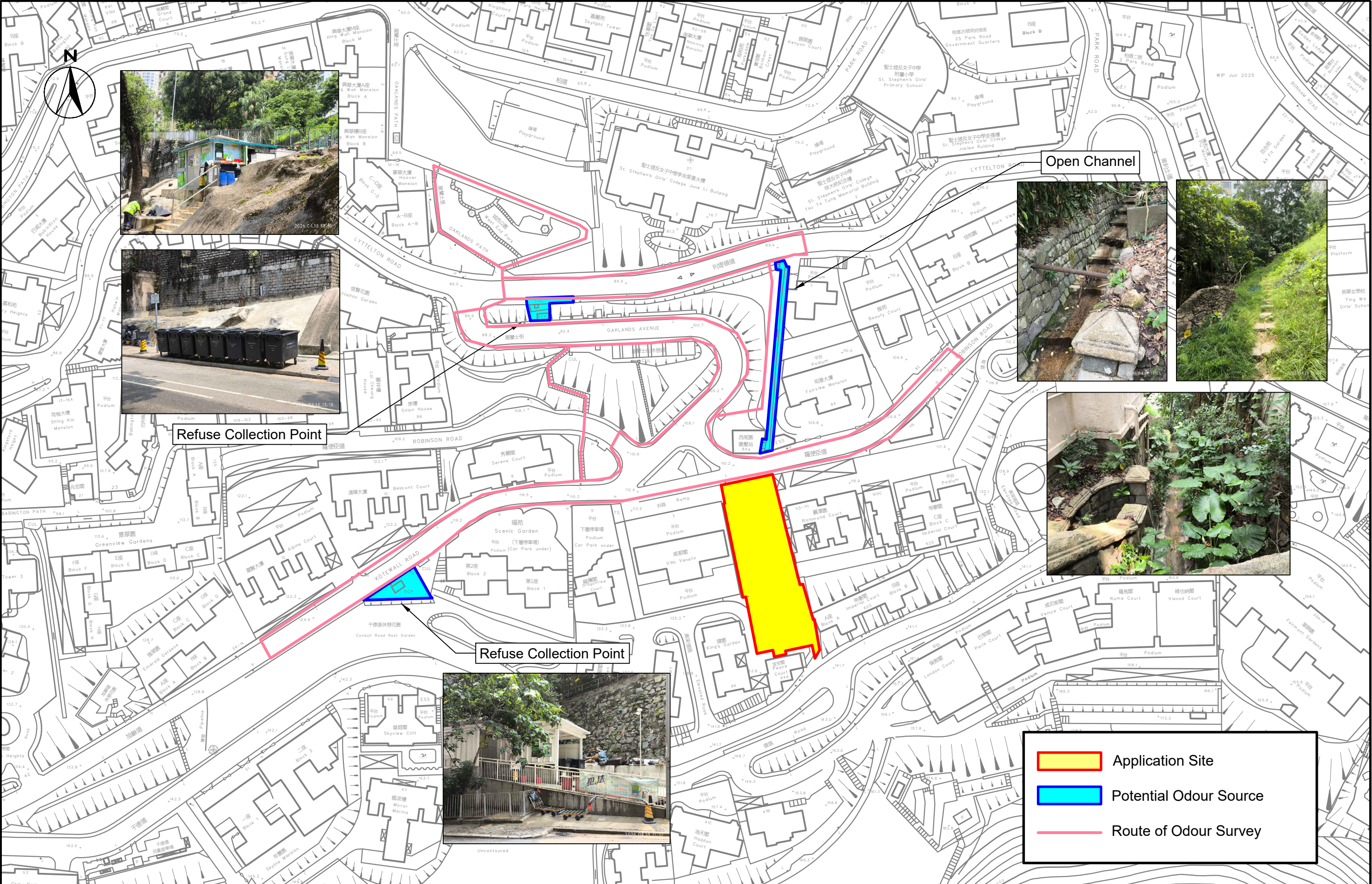
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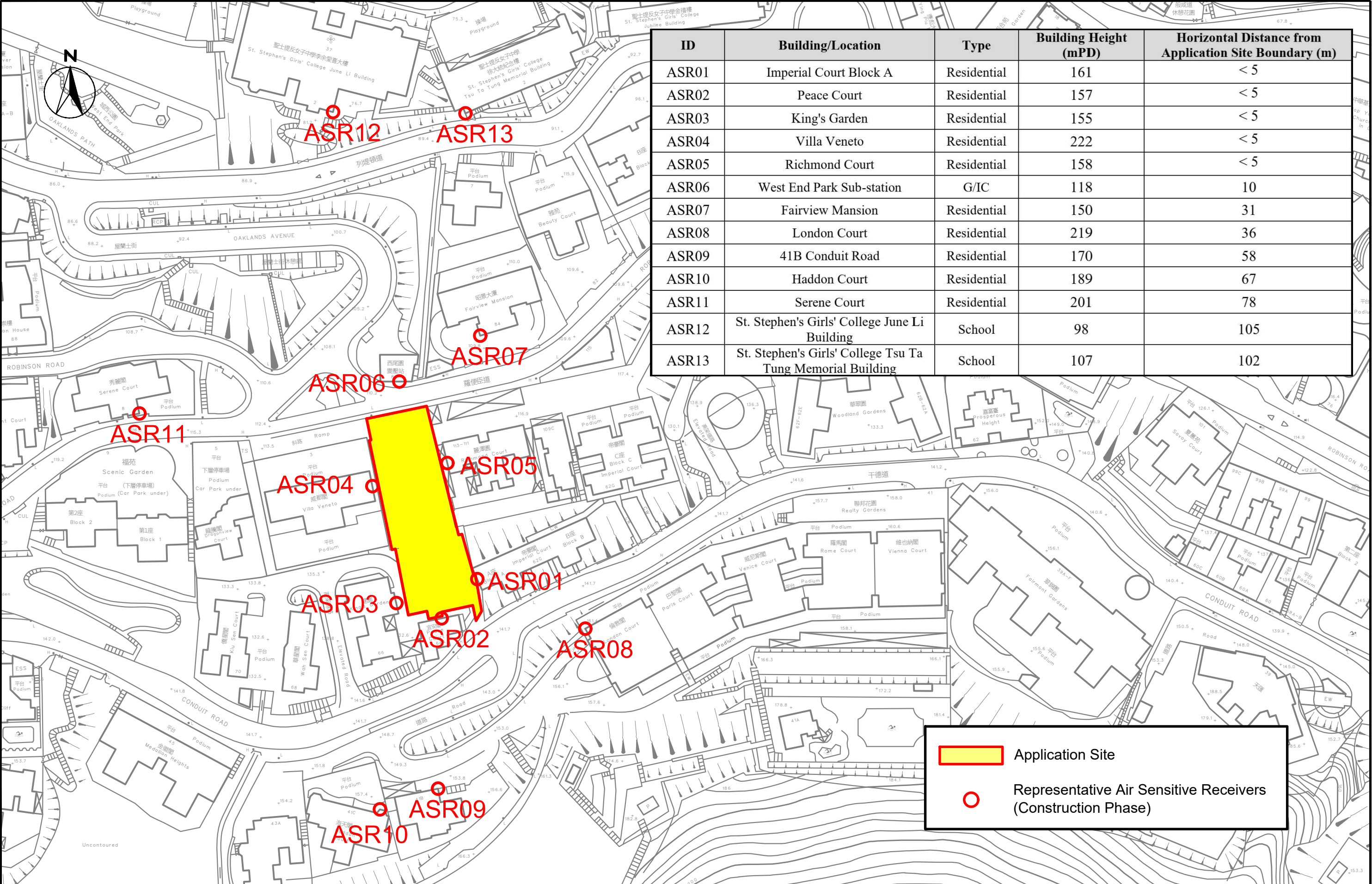
[37,29]

[38,29]

-  Application Site
-  PATH Grid
-  500m from Application Site Boundary (Assessment Area)
-  200m from Application Site Boundary (Buffer Region for Industrial Chimney)







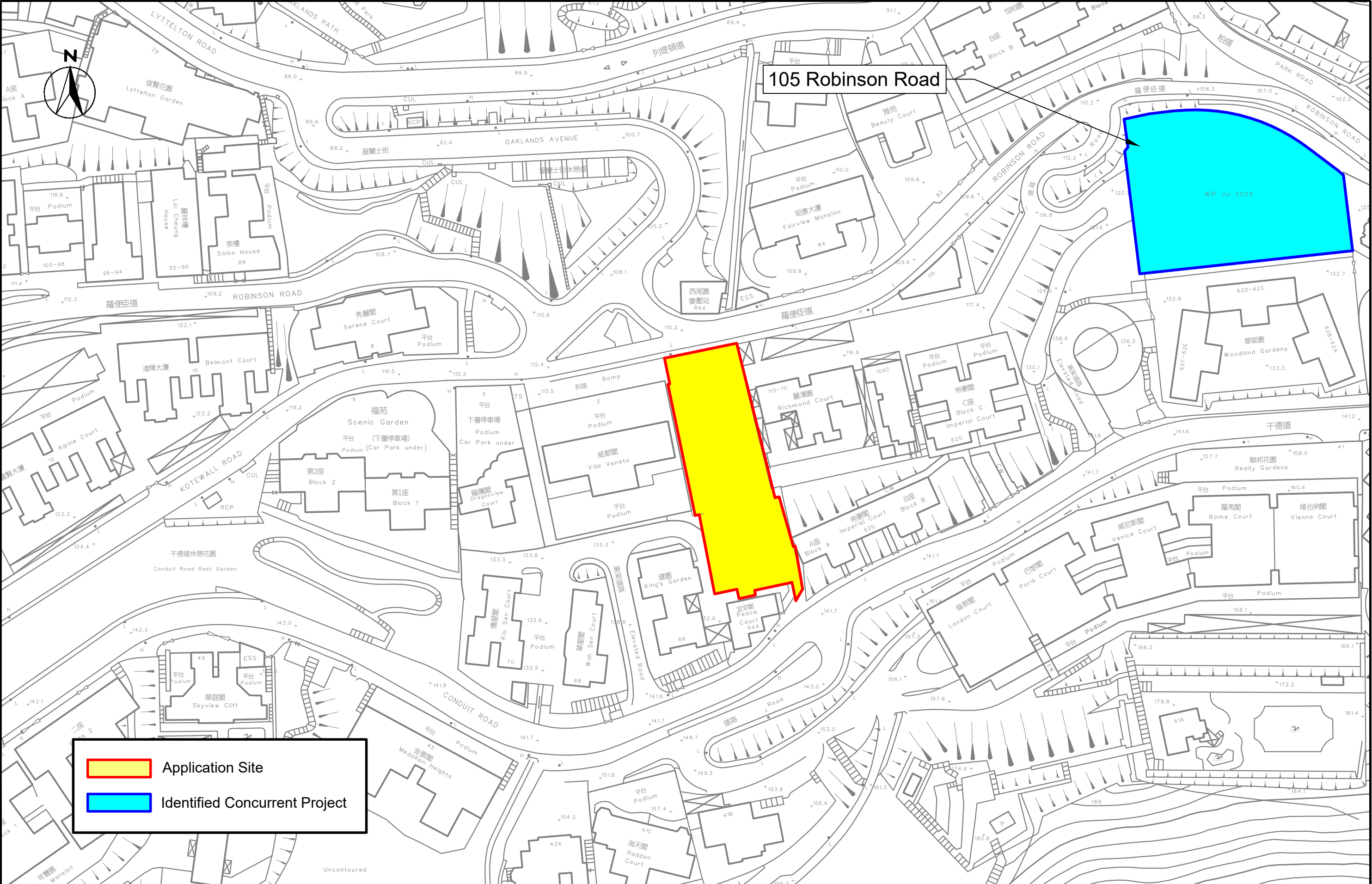
ID	Building/Location	Type	Building Height (mPD)	Horizontal Distance from Application Site Boundary (m)
ASR01	Imperial Court Block A	Residential	161	< 5
ASR02	Peace Court	Residential	157	< 5
ASR03	King's Garden	Residential	155	< 5
ASR04	Villa Veneto	Residential	222	< 5
ASR05	Richmond Court	Residential	158	< 5
ASR06	West End Park Sub-station	G/IC	118	10
ASR07	Fairview Mansion	Residential	150	31
ASR08	London Court	Residential	219	36
ASR09	41B Conduit Road	Residential	170	58
ASR10	Haddon Court	Residential	189	67
ASR11	Serene Court	Residential	201	78
ASR12	St. Stephen's Girls' College June Li Building	School	98	105
ASR13	St. Stephen's Girls' College Tsu Ta Tung Memorial Building	School	107	102



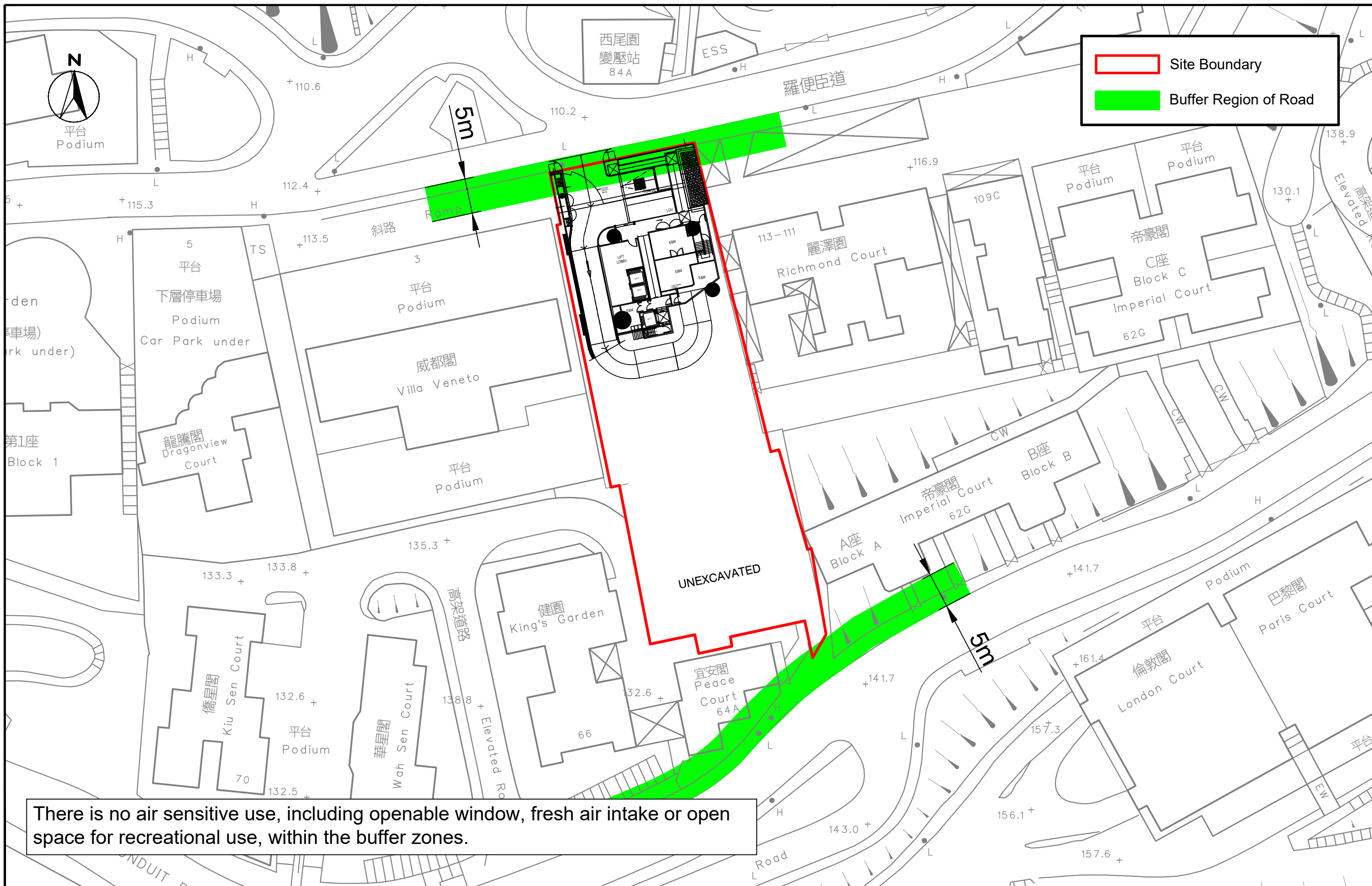
Application Site

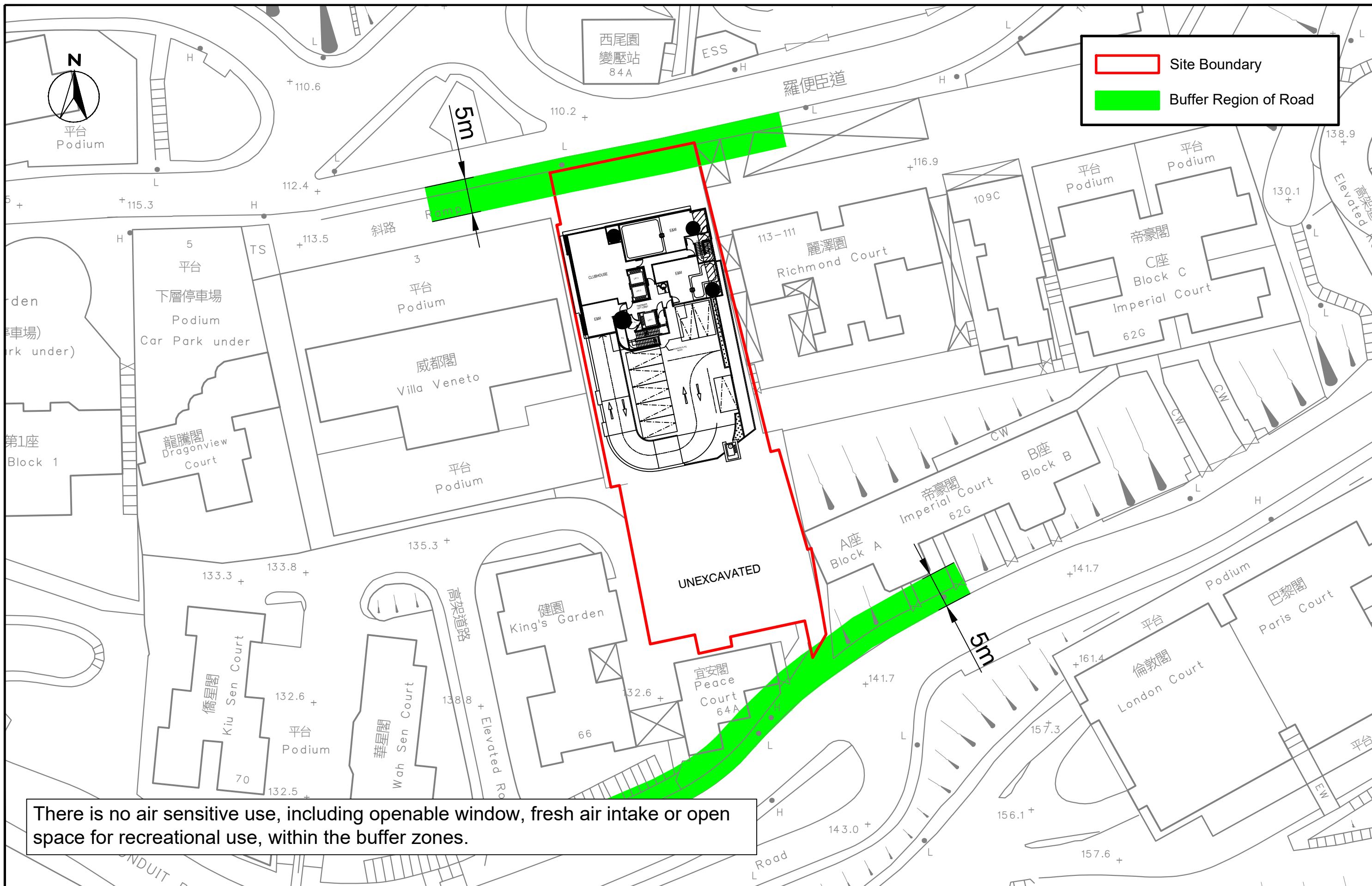


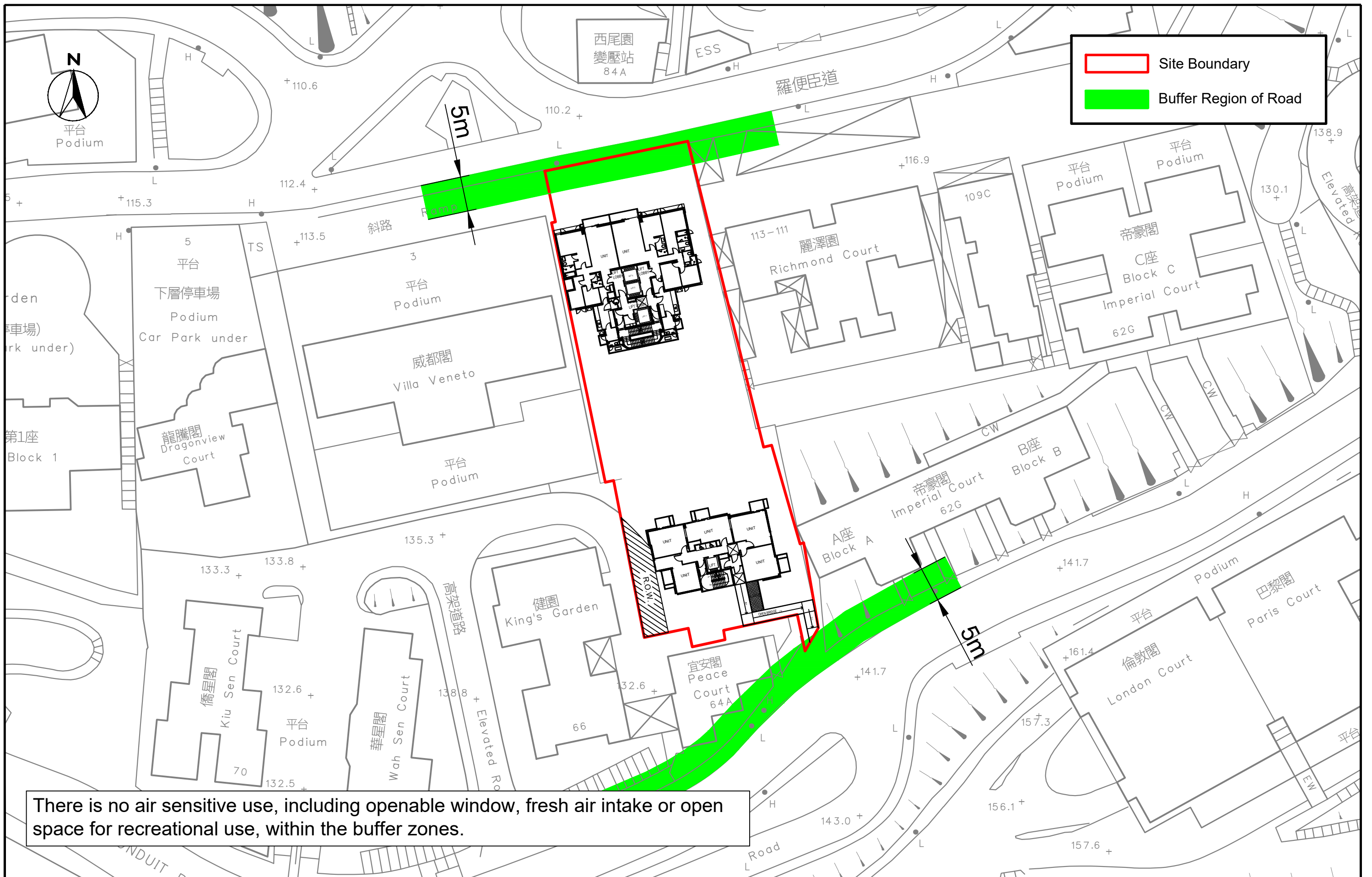
Representative Air Sensitive Receivers (Construction Phase)



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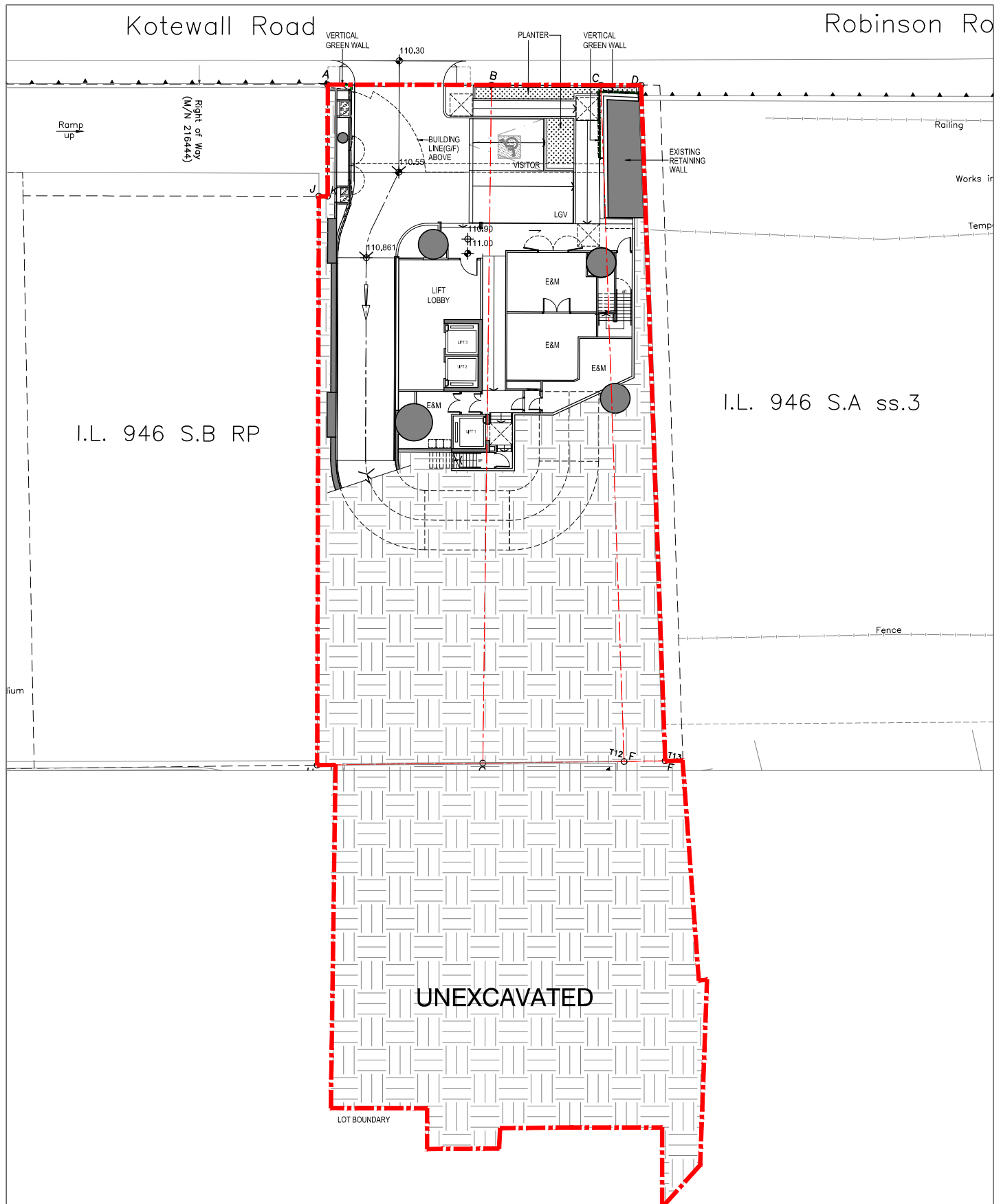




**APPENDIX 1-1
NOTIONAL PLAN OF THE PROPOSED
DEVELOPMENT**

Kotewall Road

Robinson Road



I.L. 946 S.B RP

I.L. 946 S.A ss.3

UNEXCAVATED

SK-5

LG2 FLOOR PLAN

N

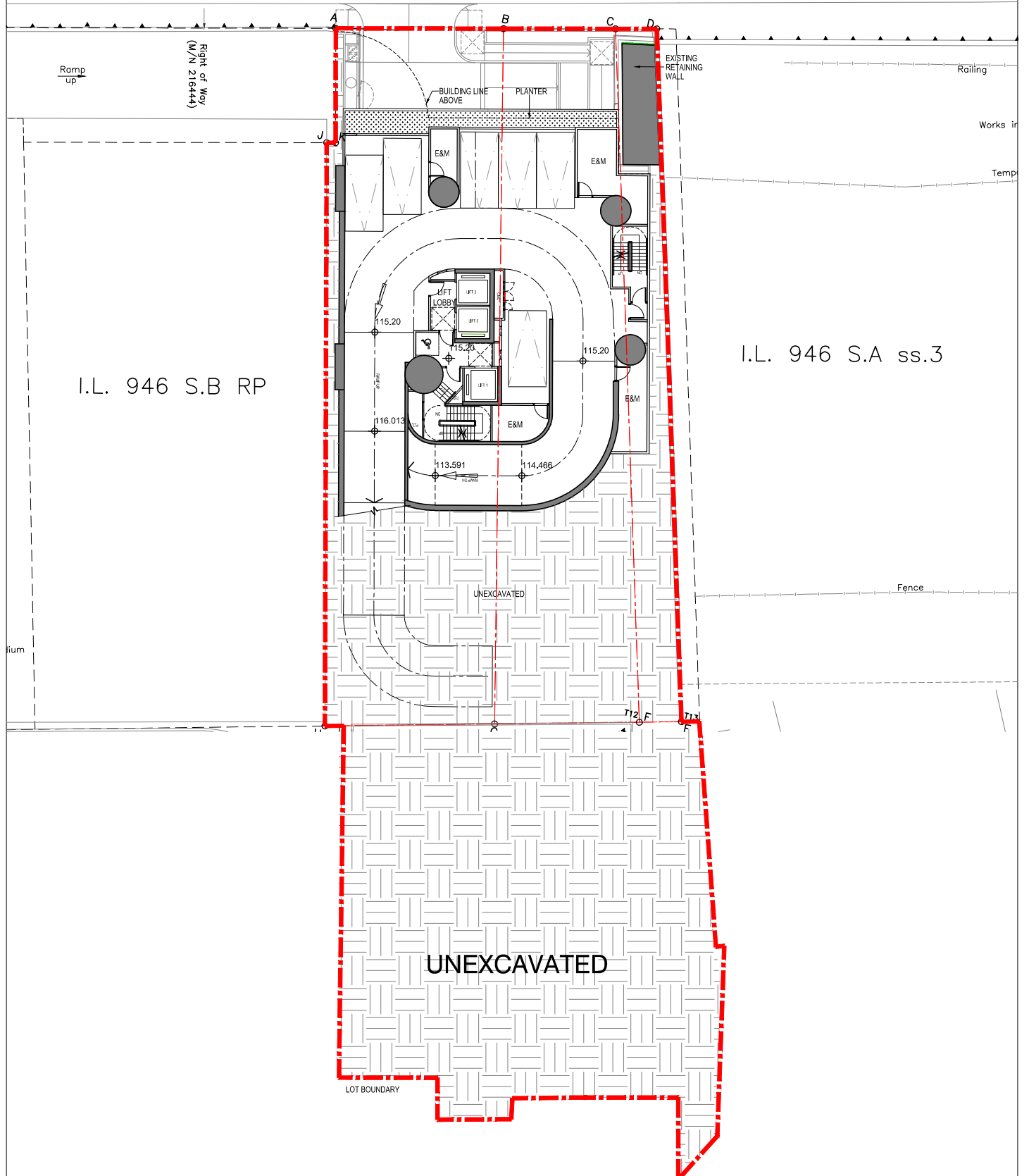
LEGEND

- APPLICATION SITE
- UNEXCAVATED AREA



Kotewall Road

Robinson Road



SK-5

LG1 FLOOR PLAN

LEGEND

-  APPLICATION SITE
-  UNEXCAVATED AREA



Robinson Ro



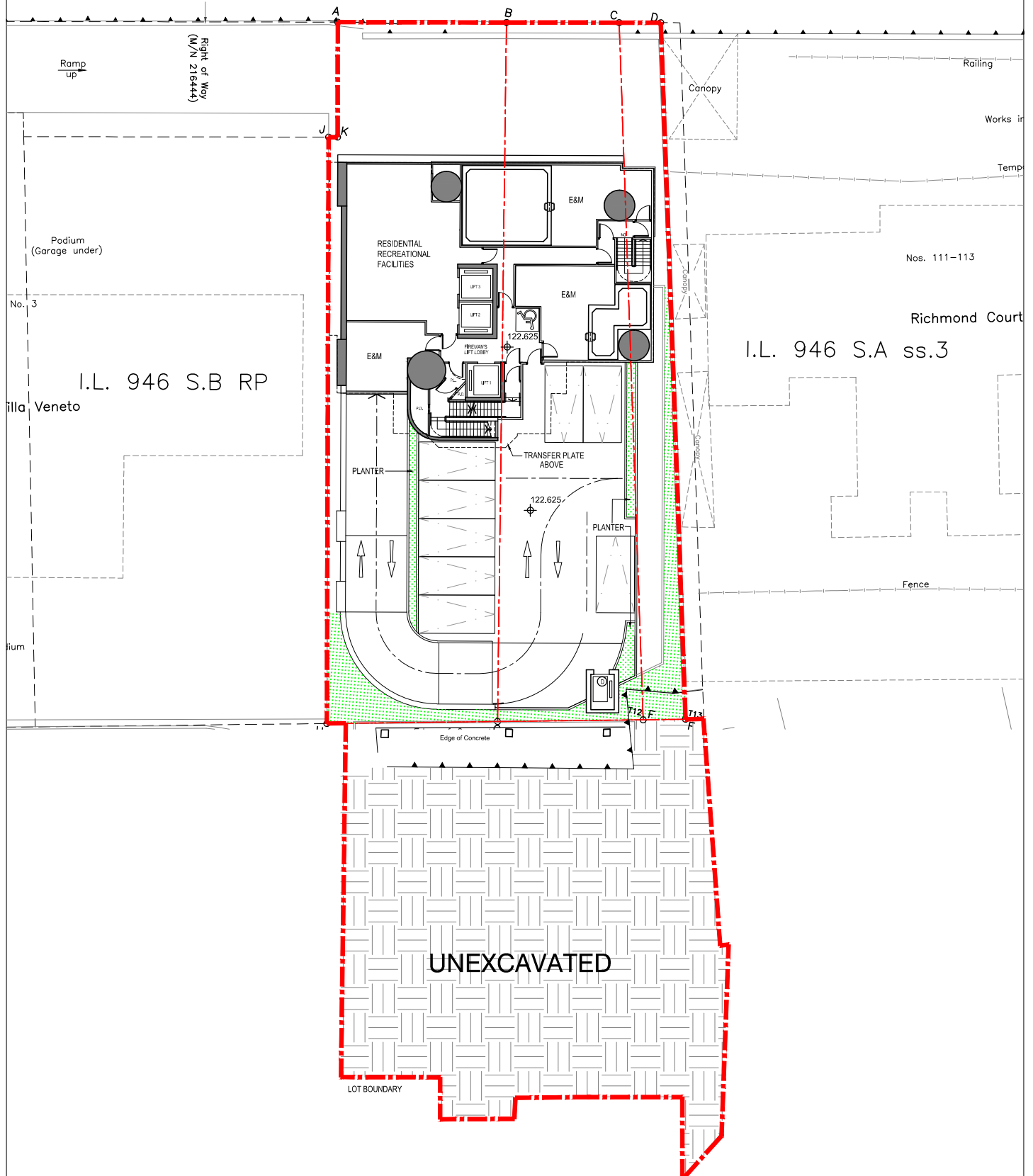
GROUND FLOOR PLAN

APPLICATION SITE
UNEXCAVATED AREA



Kotewall Road

Robinson Road

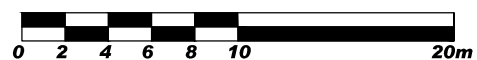


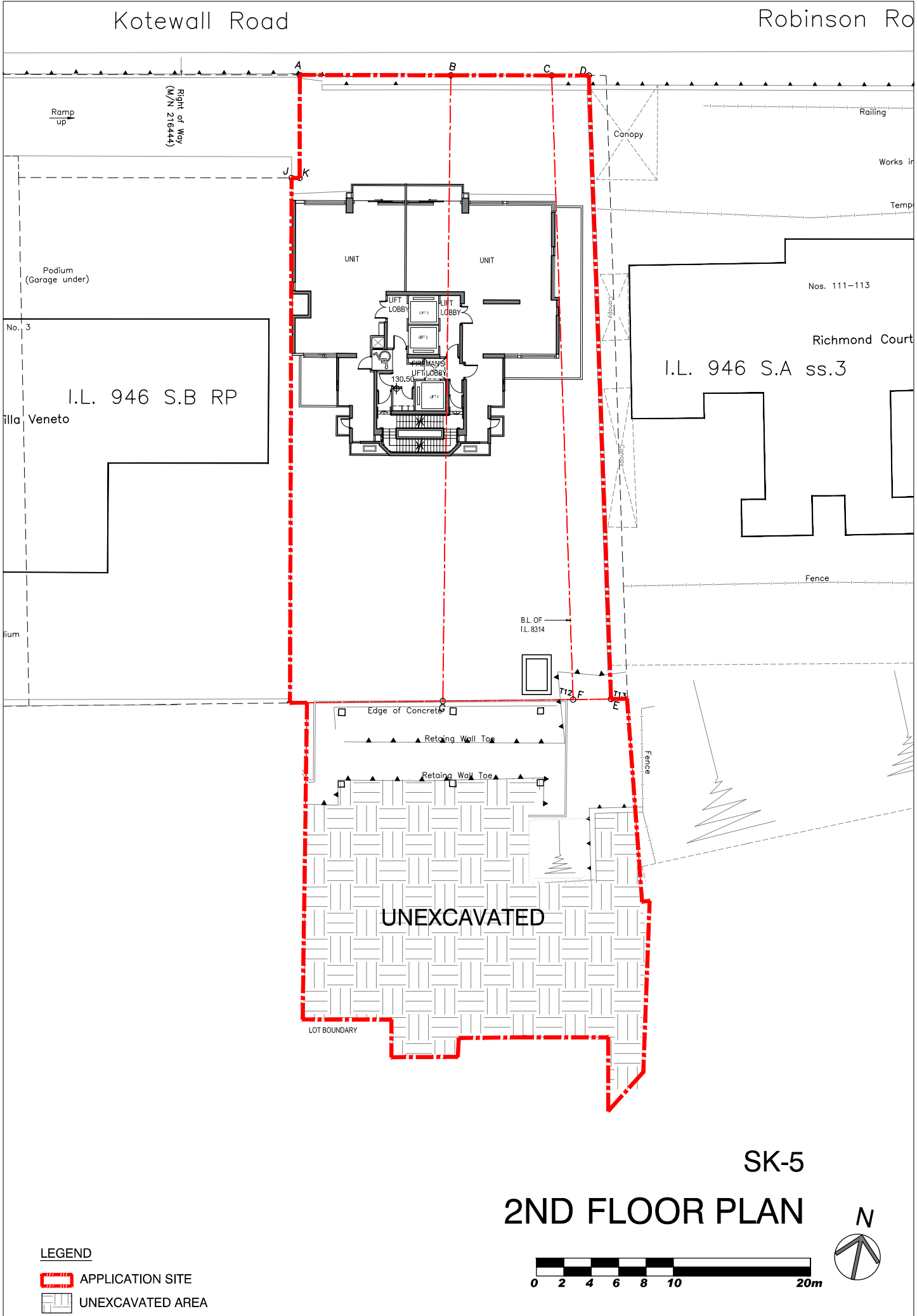
SK-5

1ST FLOOR PLAN

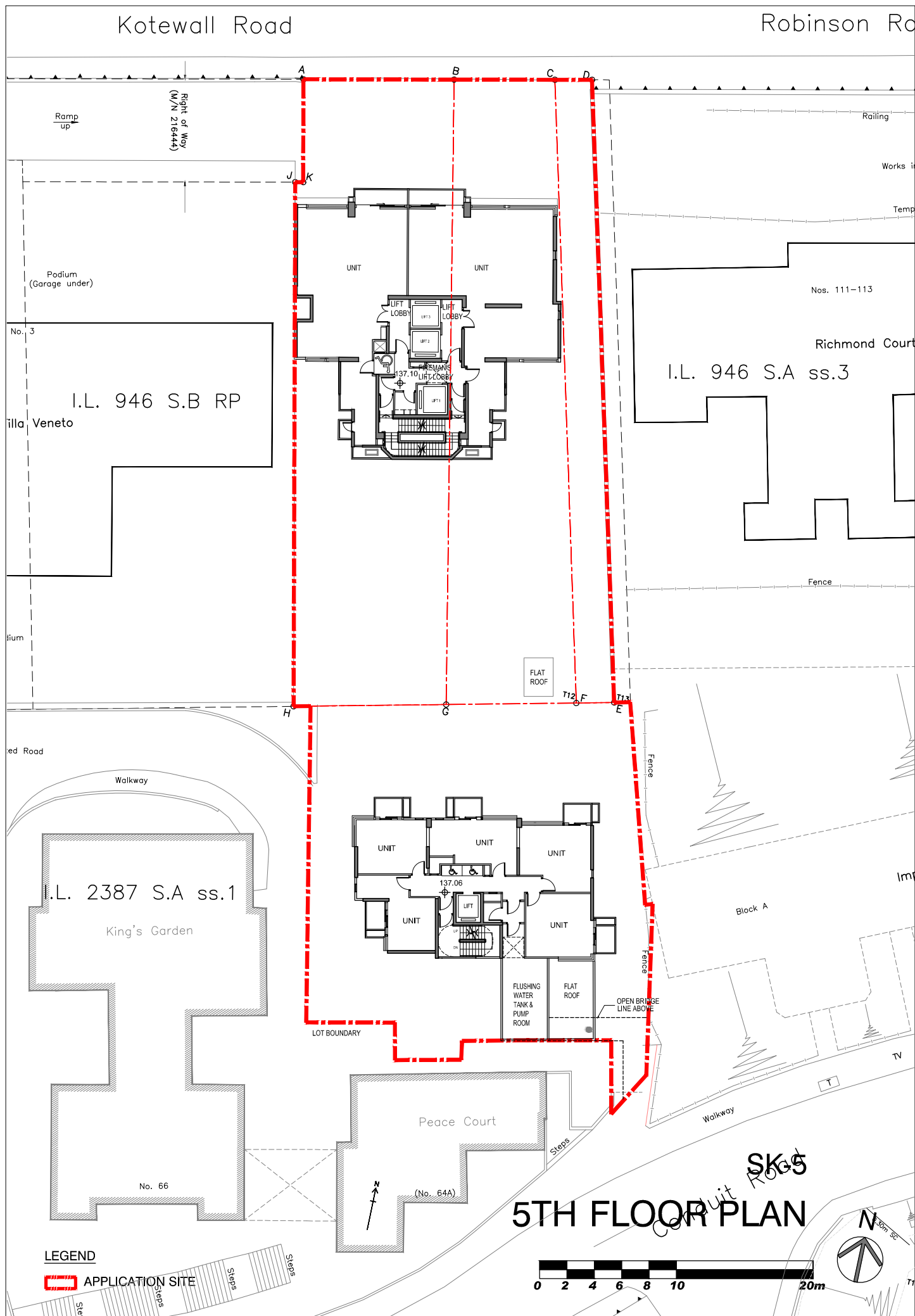
LEGEND

-  APPLICATION SITE
-  UNEXCAVATED AREA

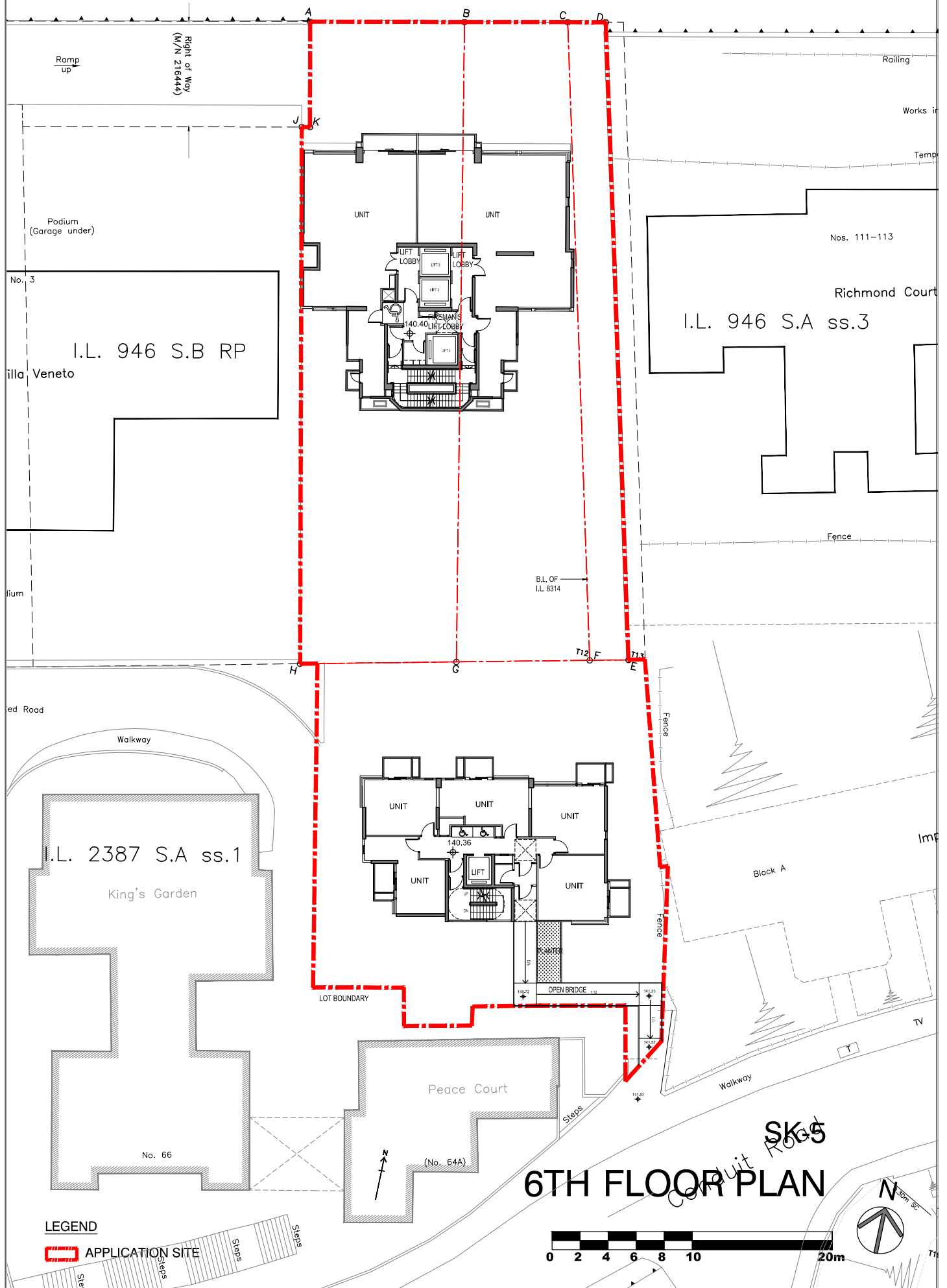




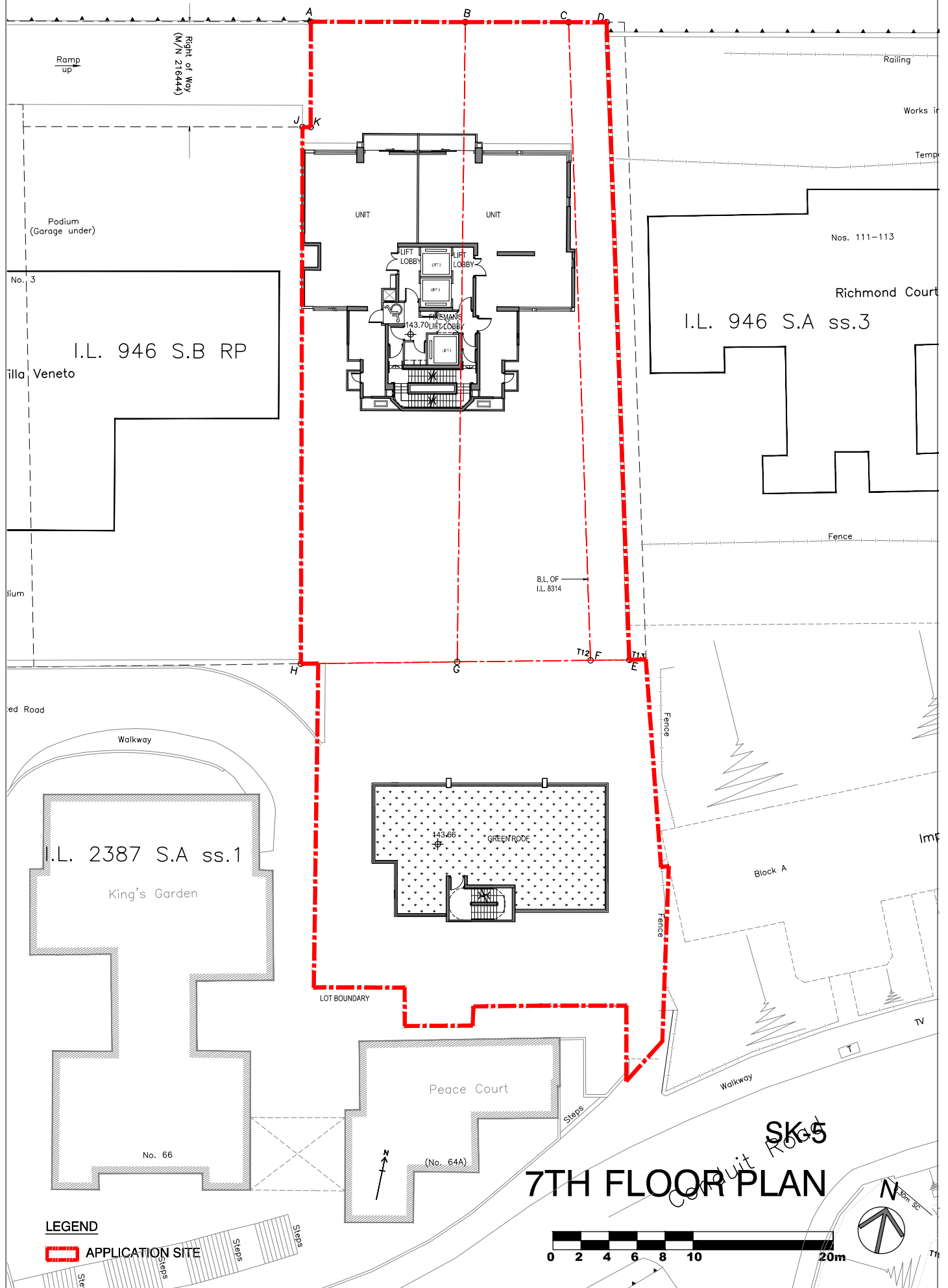


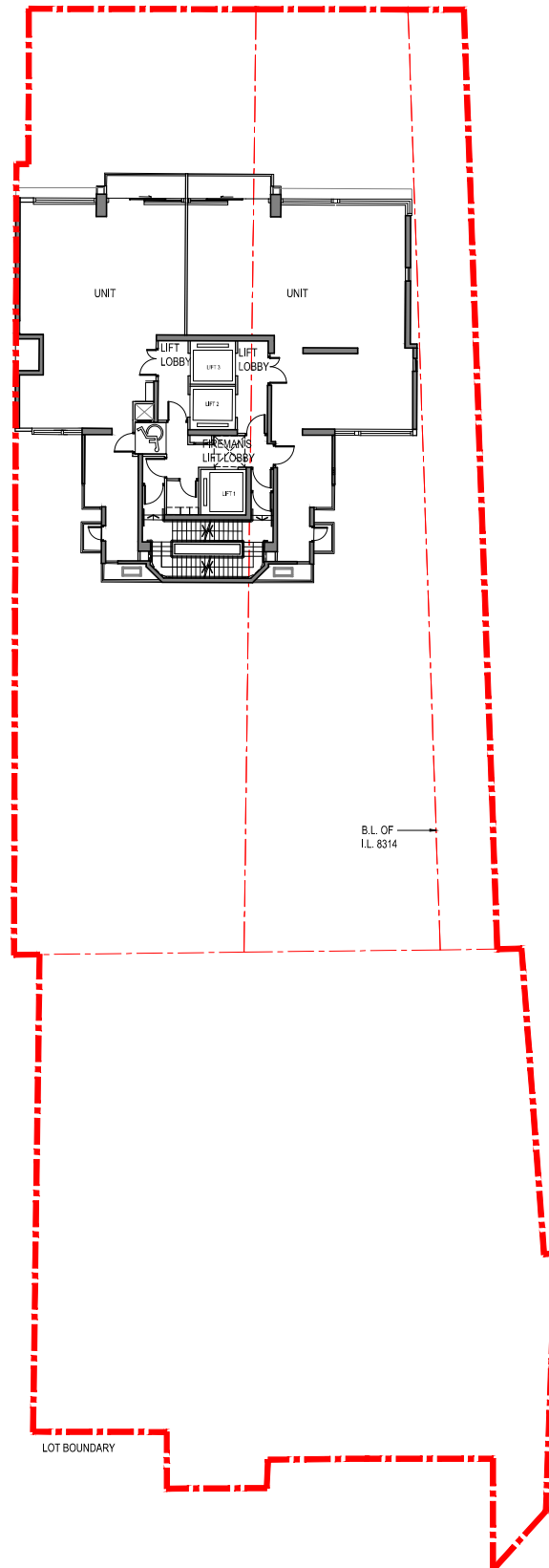


Robinson Ro



Robinson Ro





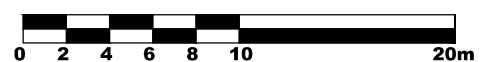
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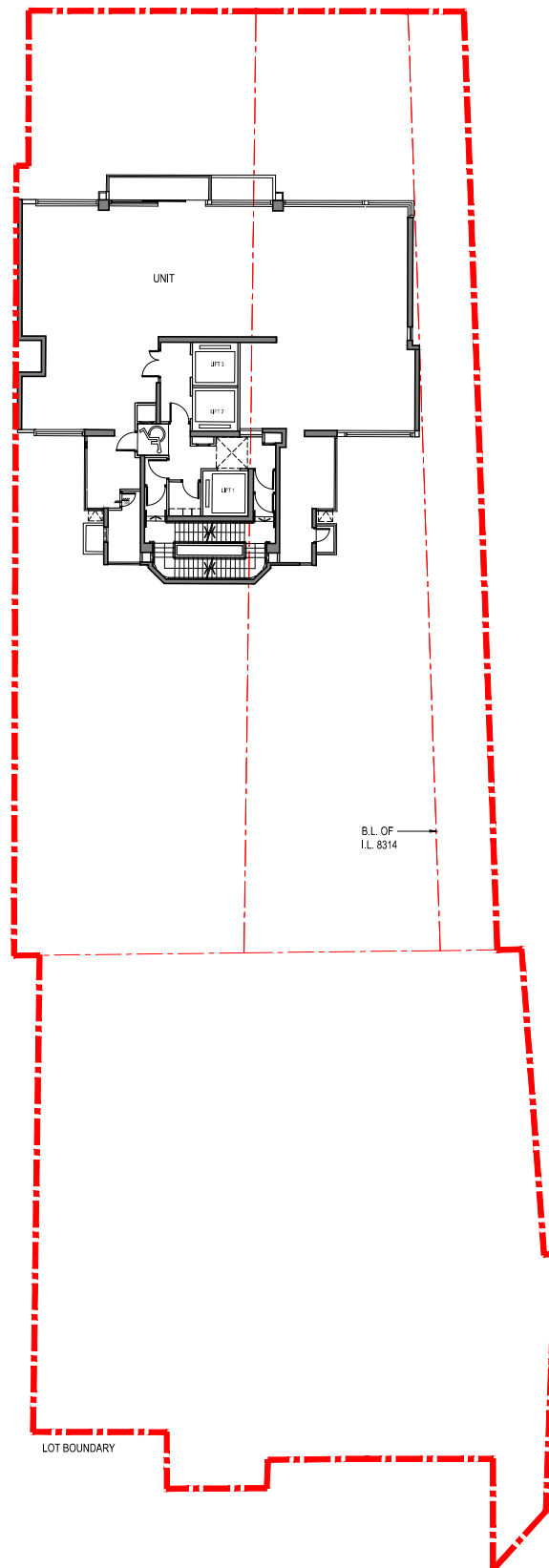
8-12TH FLOOR PLAN



LEGEND

 APPLICATION SITE



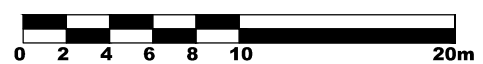


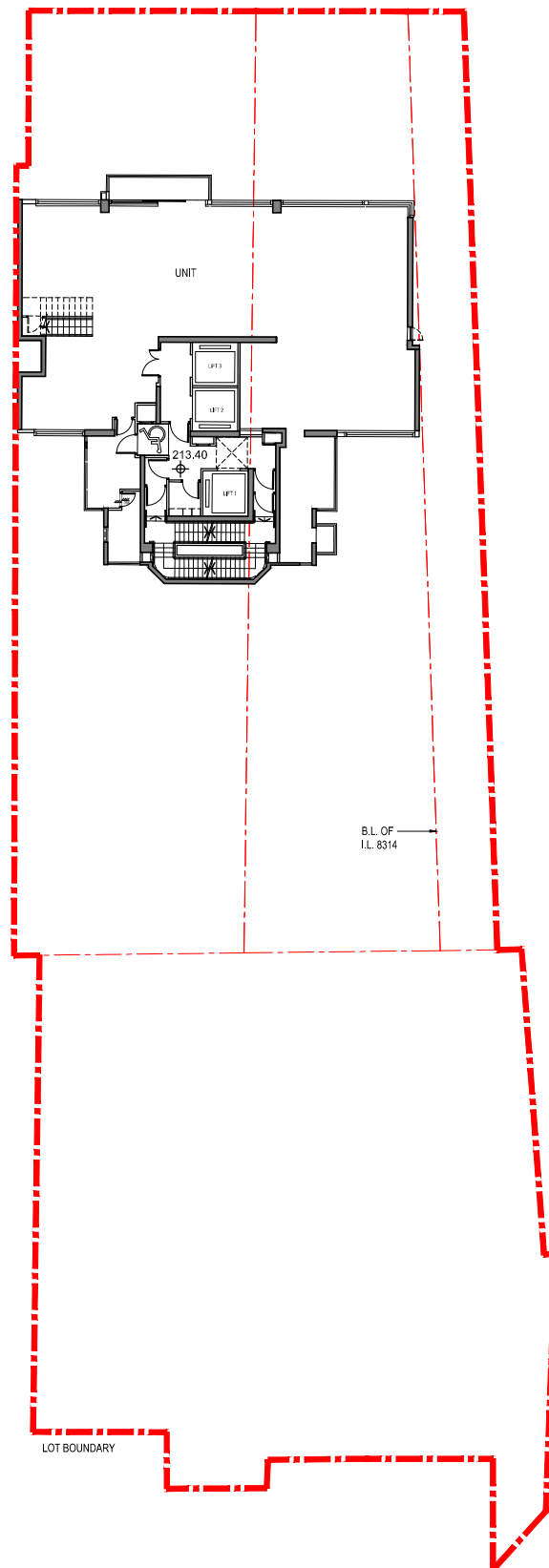
SK-5

15-30TH FLOOR PLAN

LEGEND

 APPLICATION SITE





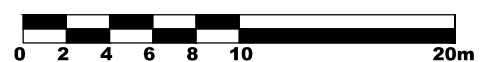
SK-5

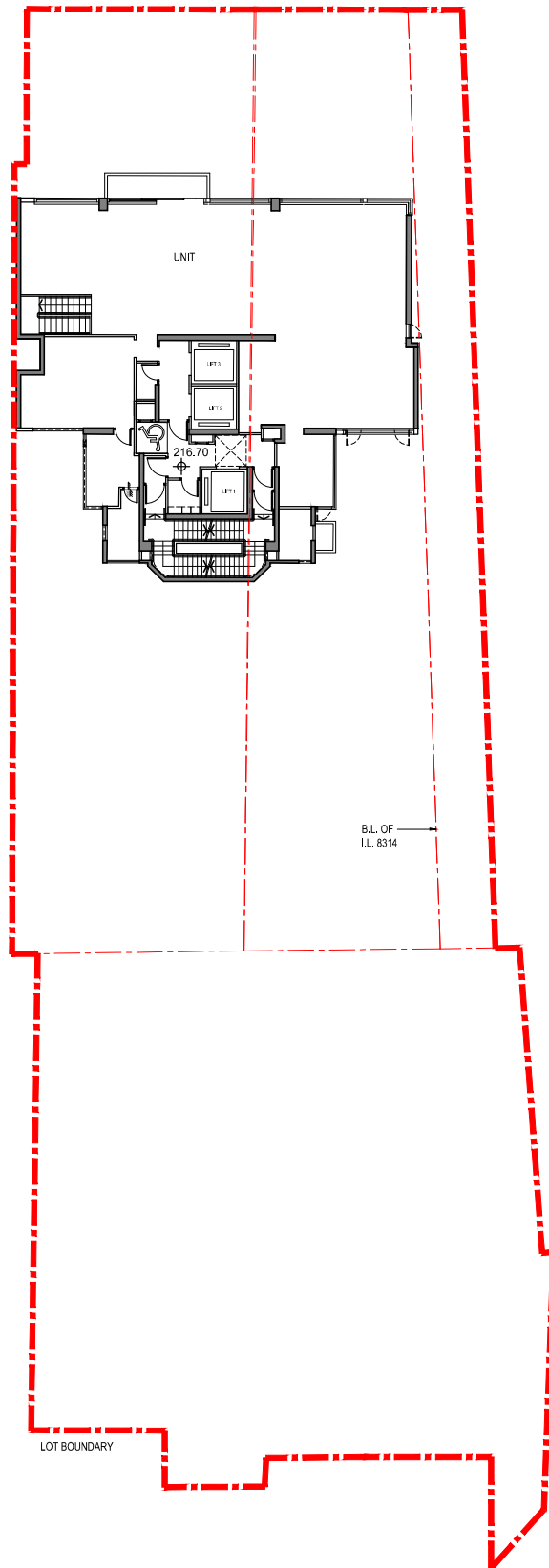
31st FLOOR PLAN



LEGEND

 APPLICATION SITE



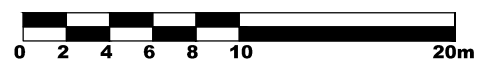


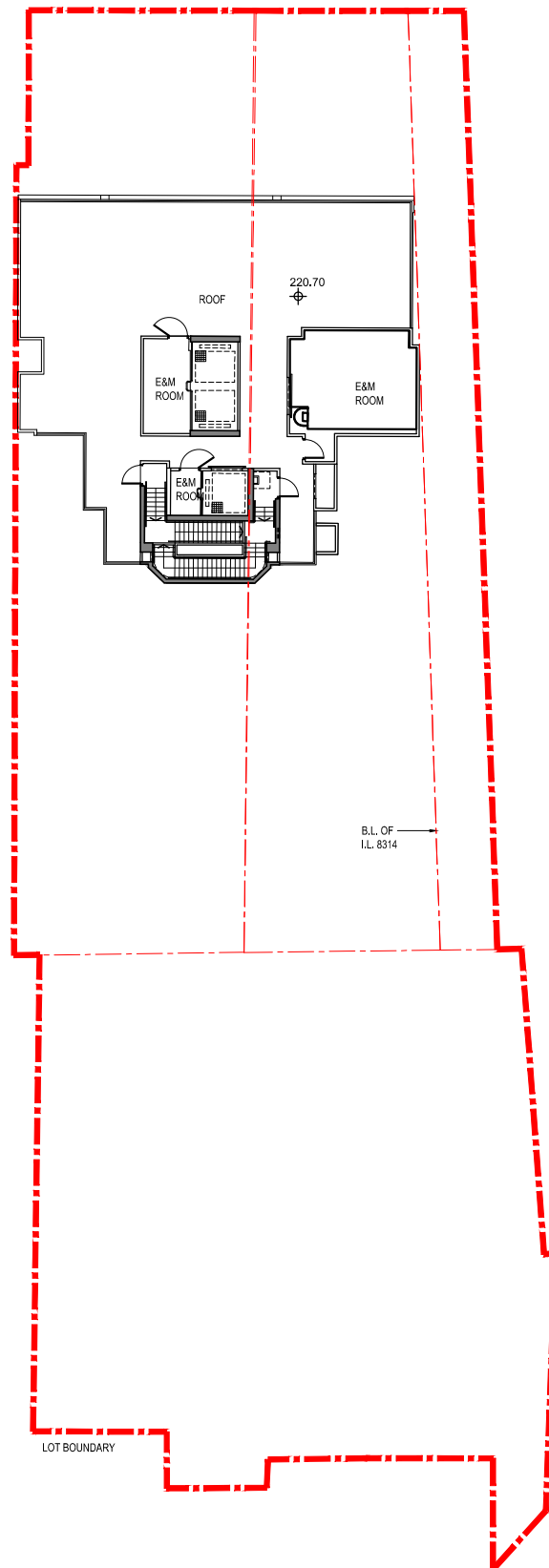
SK-5

32nd FLOOR PLAN

LEGEND

 APPLICATION SITE



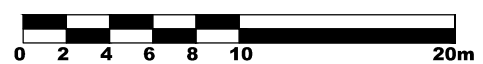


SK-5

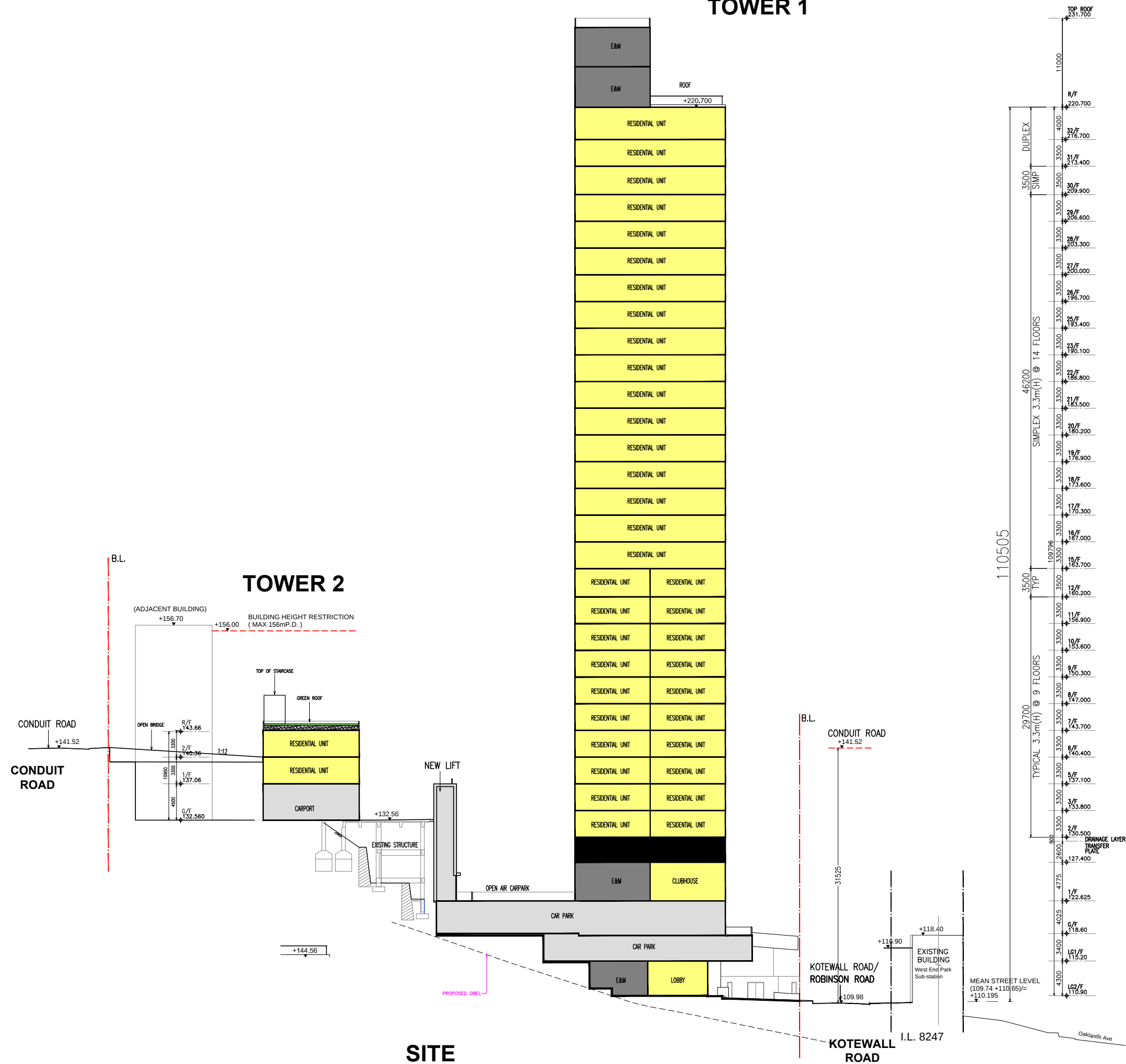
ROOF FLOOR PLAN

LEGEND

 APPLICATION SITE



TOWER 1



1:250 (A3)

**APPENDIX 3-1
REPLY FROM TRANSPORT
DEPARTMENT REGARDING ROAD
CLASSIFICATION**

Subject: Re: 1 Kotewall Road & 64 Conduit Road, Mid-Levels - s16 Planning Application (TPB ref.: A/H11/108)_Confirm Road Type

From: Eric Tak LAM/TD <[REDACTED]>

Date: 05-Aug-26, 4:17 PM

To: CKM Asia <[REDACTED]k>

CC: Wilson Man <[REDACTED]>, Gladys Ng <[REDACTED]>, Kenneth To <[REDACTED]>, "'Leo Leung'" <[REDACTED]>, "Colman Wong (Cinotech)" <[REDACTED]>, Wilson Man <[REDACTED]>

Dear Flora,

We confirm that the section of Robinson Road adjacent to Kotewall Road is classified as Local Distributor.

Regards,
LAM Tak Eric
E/Peak, TE/HK
Transport Department
Tel : [REDACTED]

From: CKM Asia <[REDACTED]>

Sent: 5 August, 2026 11:09 AM

To: Eric Tak LAM/TD <[REDACTED]>

Cc: Wilson Man <[REDACTED]>; Gladys Ng <[REDACTED]>; Kenneth To <[REDACTED]>; 'Leo Leung' <[REDACTED]>; Colman Wong (Cinotech) <[REDACTED]>; Wilson Man <[REDACTED]>

Subject: 1 Kotewall Road & 64 Conduit Road, Mid-Levels - s16 Planning Application (TPB ref.: A/H11/108)_Confirm Road Type

Importance: High

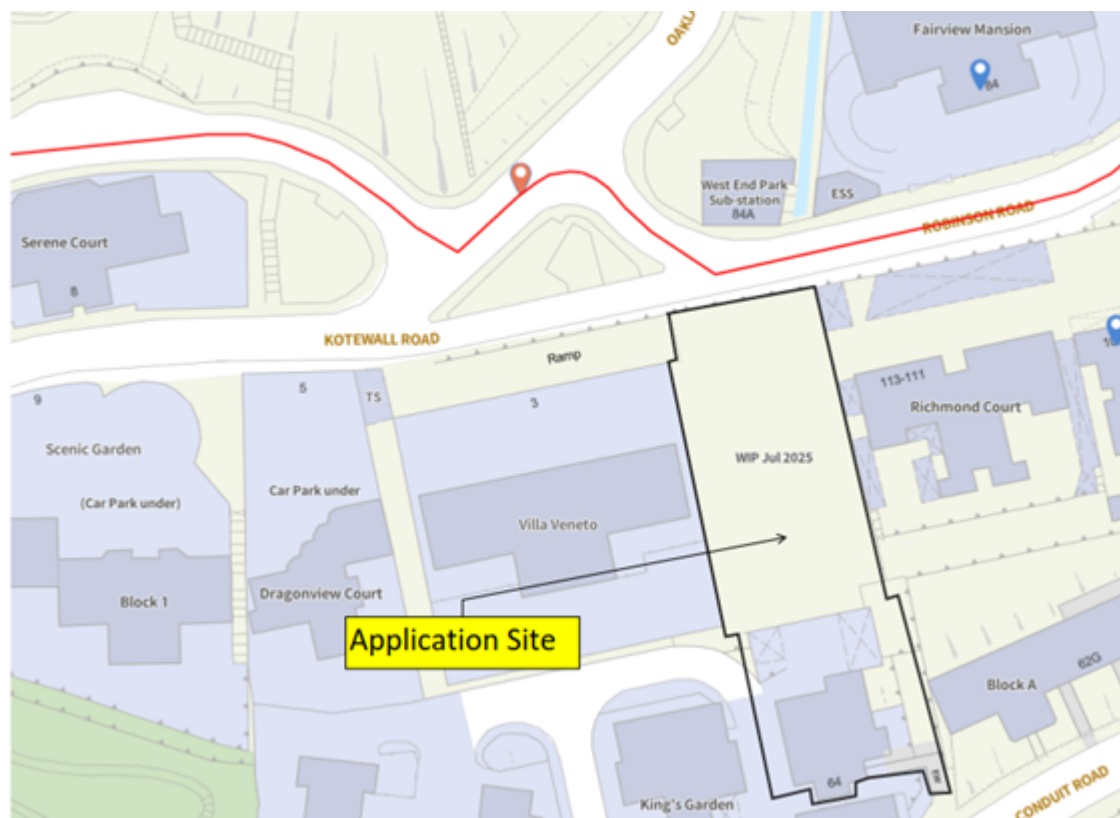
Attn: Mr. LAM Tak, Eric (Engr/Peak)

Dear Eric,

We refer to the comment, i.e item 4 (i) from Environmental Protection Department for the captioned S16 application (see below)

“4. Section 3.3.14 –

- (i) The site is located next to Robinson Road. Please clarify the road type of that section of Robinson Road, discuss the buffer distance required, and update relevant discussion in Section 5 and figures accordingly.”*



From the Annual Traffic Census, published by Transport Department, the closest counting station is Station 1643, i.e., Kotewall Road between Po Shan Road and Robinson Road, which is classified as a Local Distributor. In view that the characteristics of Robinson Road is similar to Kotewall Road, we have assumed that Robinson Road fronting the Application Site is also **Local Distributor**.

It is much appreciated if you could confirm your agreement to the **road type** we have assumed for Robinson Road, which is a **Local Distributor**.

Should you have any queries, please do not hesitate to contact the undersigned.

Thank you for your attention.

Regards,

Flora Chan

CKM Asia Limited

Traffic and Transportation Planning Consultants

Phone: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

Website: [REDACTED]

Address: [REDACTED]

