

銅鑼灣

Causeway Bay

Section 16 Application for Proposed Underground Vehicular Tunnel Connecting Lee Garden Three (10 Hysan Avenue) and Lee Garden Eight (8 Caroline Hill Road) below Leighton Road and Sunning Road, Causeway Bay

A/H6/98 Further Information 1

Replacement Pages of Planning Statement



August 2026

**Silver Nicety Company Limited and
Patchway Holdings (HK) Limited**

**Section 16 Application for Proposed Underground
Vehicular Tunnel Connecting Lee Garden Three (10
Hysan Avenue) and Lee Garden Eight (8 Caroline Hill
Road) below Leighton Road and Sunning Road,
Causeway Bay**

Planning Statement

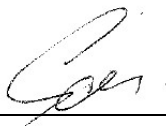
Document No. 001

URBIS Limited

August 2026

In association with
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28 August 2026

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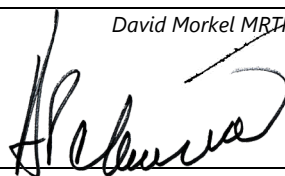


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28 August 2026

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Revision Log		
Revision	Issue Date	Description
Rev. 0 Draft	20260130	First Draft Issue
Rev. 1 Draft	20260629	Second Draft Issue
Rev. 2 Draft	20260715	Third Draft Issue
Rev. 0 Final	20260716	First Final Issue
Rev.1 Final	20260828	Second Final Issue (Further Information 1)

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LIST OF ABBREVIATIONS

BRRD	Brown Root Rot Disease
C(2)	Commercial (2)
GFA	Gross Floor Area
GIC	Government, Institution or Community
GMB	Green Mini Bus
MTR	Mass Transit Railway
OVT	Old and Valuable Trees
OZP	Outline Zoning Plan
TPB	Town Planning Board
TPZ	Tree Protection Zone

One, Lee Garden Two and Lee Garden Three have been proposed as part of the overall plan to alleviate existing heavy at-grade traffic flows in Causeway Bay. These two tunnels were the subject of two Section 16 applications (i.e. No. A/H6/93 and No. A/H6/94), which were approved by the TPB in February 2025.

- 1.2.13 The proposed Tunnel T3 leverages the underground vehicular network established by Tunnel T1 and Tunnel T2 and expands its benefits further south to the vicinity of Leighton Road and Caroline Hill Road by linking the proposed basement car park in the new Lee Garden Eight development with existing basement car parks in Lee Garden One, Lee Garden Two and Lee Garden Three. The integration of basement car parks will enhance the accessibility of this underground vehicular network through multiple entrances across the various commercial developments and will encourage more efficient use of car parking spaces.
- 1.2.14 It is for the reasons noted above that, Tunnel T3 connecting Lee Garden Three and Lee Garden Eight is proposed in this subject application.

1.3 LAND STATUS

- 1.3.1 The Application Site includes Government land underneath Leighton Road and Sunning Road, and part of Inland Lot No. 29 ("IL29") S.J ss.2 & IL 29 S.J RP where Lee Garden Three is located. The southern end of the Application Site abuts Inland Lot No. 8945 ("IL8945") where Lee Garden Eight is located. All three private lots - as illustrated in **Figure 1.4** below - are held by subsidiary companies of Hysan.

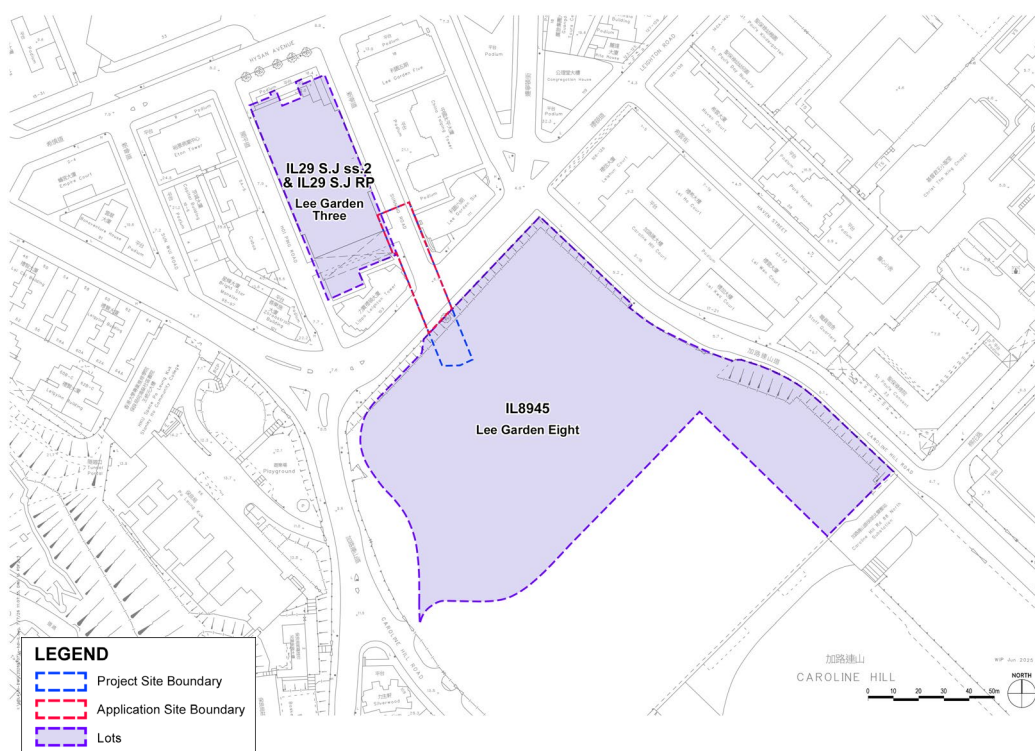


Figure 1.4 - A Plan showing IL29 S.J ss.2 & IL29 S.J RP and IL8945 (Source: GeoinfoMap)

IL 29 S.J ss.2 & S.J RP and IL 29 S.J ss.1 RP (Lee Garden Three)

- 1.3.2 The Government Lease governing IL 29 S.J ss.2 & S.J RP and IL 29 S.J ss.1 RP is virtually unrestricted except for a rate and range clause and offensive trades clause. The term of the Government Lease is 982 years commencing on 25 June 1860. A Modification Letter was executed on 10 January 2025 to allow erection of a covered footbridge connecting Lee Garden Three and Lee Garden Five. Another lease modification application for the vehicular Tunnel T1 connecting Lee Garden One and Lee Garden Three

has been completed and the modification letter was executed on 7 May 2026.

IL8945 (Proposed Lee Garden Eight)

- 1.3.3 IL 8945 is held under Conditions of Sale No. 20379 (as varied or modified by a Modification Letter dated 7 November 2024). IL8945 was sold by Government tender on 10 June 2021 and is restricted to non-industrial (excluding residential, godown and petrol filling station) uses, and is subject to a total maximum GFA of 102,000m².
- 1.3.4 The proposed Tunnel T3 falls within the Edged Pecked Purple Area and the Pink Hatched Green Area defined in the Conditions of Sale for IL8945. According to Special Conditions No. ("SC")(2)(a)(ii) of the Conditions of Sale, there is a Government-identified Old and Valuable Tree (OVT) (Registration No. LANDSD(LEASED) WCH/1) growing partly within IL8945, with its crown, trunk and roots spreading into the approximate area shown as Edged Pecked Purple on PLAN I of the Conditions of Sale. The Pink Hatched Green Area indicates the area of tree HKP WCH/1 within the boundary of IL8945.
- 1.3.5 Under SC (13)(k), "save with the prior written consent of the Director, no alteration or addition works may be carried out on, over, above, under, below or within the Pink Hatched Green Area" on PLAN I of the Conditions of Sale.
- 1.3.6 Therefore, to proceed with the proposed Tunnel T3, relevant land application(s) will be made to Lands Department accordingly.

1.4 PLANNING HISTORY

Application Site

- 1.4.1 There have been no previous planning applications on the Application Site.

Project Site (i.e. area falling outside the Application Site)
- 1.4.2 However, the southern portion of the Project Site, which falls outside the Application Site and which falls within an area zoned "C(2)" on the Approved Wong Nai Chung OZP No. S/H7/21, has been the subject of multiple planning applications.
- 1.4.3 The development options and development potential of the area were reviewed and assessed in consultancy studies in 2013 commissioned by the Government, followed by a rezoning of the area from "Other Specified Uses" annotated "Sports and Recreation Club" ("OU(SRC)") to "C(2)" as approved by the TPB on 11 September 2020. The OZP incorporating the rezoning of the area was approved by the Chief Executive in Council on 24 November 2020. A requirement was imposed by the OZP for the submission of a Layout Plan to the Board under the Section 16 planning application system of the Town Planning Ordinance (Cap.131).
- 1.4.4 In March 2022, submission of a Layout Plan application was made by Patchway Holdings (HK) Limited (i.e. one of the Applicants of the current application for the proposed Tunnel T3) to the TPB under Section 16 of the Town Planning Ordinance (Application No. A/H7/181). This was for use as proposed permitted commercial development (Office, Eating Place, Shop and Services) with Social Welfare Facility, Public Clinic, Place of Recreation, Sports or Culture, Public Transport Station and Public Vehicle Park (excluding Container Vehicle), and also for minor relaxation of gross floor area restriction (from 100,000m² to 102,000m² (2%) to accommodate 2,000m² of additional PACF on 5/F of Towers 1 and 2). The application was approved on 6 May 2022.
- 1.4.5 Subsequent to this approved Section 16 application, a Section 16A application (No. A/H7/181-2) for amendments to the approved Layout Plan was approved by the Director of Planning, under the delegated authority of the TPB, on 29 May 2025.
- 1.4.6 In September 2025, a Section 16 application (No. A/H7/188) for further amendments to the approved Layout Plan was approved by the TPB on 24 October 2025.

4.3 INDICATIVE DEVELOPMENT PROPOSAL

- 4.3.1 The major features and development parameters of the project are listed in **Table 4.2** below and illustrated in **Figures 4.1 to 4.3**.

Table 4.2: Major Development Parameters

Major Development Parameters	Measurement
Application Site Area*	Approx. 610 m ²
Length of the Proposed Tunnel	Approx. 70 m
Width of the Proposed Tunnel	Approx. 12 m
Minimum Internal Clear Width of the Proposed Tunnel at Each Level	5m (i.e. including a minimum clear width of 4m for driveway)
Elevation	Top of the Proposed Tunnel: Approx. +0.25mPD Base of the Proposed Tunnel: Approx. -14.80mPD
Gradient of the Proposed Tunnel at Each Level	Approx. 1: 10
Minimum Clear Headroom of the Proposed Tunnel at Each Level	2.4 m
Completion year	Q3 2033

Note: The Application Site forms part of the Project Site which is approx. 830 m².

- 4.3.2 The opening hours of the car park at Lee Garden Three are currently 24 hours, whilst the opening hours of the car park at Lee Garden Eight will also be 24 hours. The opening hours of the car park at Lee Garden One are 7:30am to 12:30am.

4.4 METHOD OF CONSTRUCTION

- 4.4.1 The traditional 'cut-and-cover' method of tunnelling (by which a tunnel is excavated from the surface) is considered impractical since the closure of Sunning Road or Leighton Road for tunnelling work will cause substantial disturbance to vehicular and pedestrian traffic and circulation.
- 4.4.2 More appropriately for these circumstances therefore, the 'drill and excavation' method will be used, whereby excavation is carried out horizontally from a starting point below ground.
- 4.4.3 Launching the tunnel excavation from Lee Garden Eight is considered most preferable as it causes less disturbance to existing traffic at Sunning Road and Hoi Ping Road from the ingress and egress of construction vehicles into Lee Garden Three that would otherwise be required. No excavation work will take place at-grade on public roads nor will any road closure be involved. As planned, excavated spoil will be removed via a works yard in the basement of Lee Garden Eight.
- 4.4.4 Preliminary geotechnical investigations show that the tunnel construction will be in soft / mixed ground (namely, fill and alluvium). Excavation in soft ground will generate minimal noise and vibration.
- 4.4.5 As construction works will take place solely underground, noise disruption to nearby sensitive receivers will be significantly reduced and is expected to be insignificant. Existing geotechnical information indicates that rock is not expected to be encountered on the alignment.
- 4.4.6 A section of the proposed tunnel is shown in **Figure 4.3**.

4.5 VEHICULAR / PEDESTRIAN CIRCULATION AND INTERNAL PARKING PROVISION

- 4.5.1 The availability of Tunnel T3 will enable an alternative ingress route for future traffic to access Lee

Garden Eight from Percival Street and Leighton Road eastbound via the existing run-in of Lee Garden Three at Hoi Ping Road. This alternative route will bypass the two signal junctions of Leighton Road / Caroline Hill Road (West) and Caroline Hill Road (West) / Link Road. The anticipated re-routing is illustrated in **Figure 4.4**.

- 4.5.2 In addition, the ingress and egress traffic of Lee Garden One and Lee Garden Three from / to the south (i.e. Link Road) will also benefit from the development of Tunnel T3. With its provision, this traffic will no longer need to travel along Caroline Hill Road (West), Leighton Road, Yun Ping Road, Hysan Avenue, Hoi Ping Road, Lan Fong Road and Lee Garden Road. The re-routing of ingress and egress traffic for Lee Garden One and Lee Garden Three is presented in **Figure 4.4**.
- 4.5.3 After the construction of the proposed Tunnel T3, 6 nos. car parking spaces out of 195 nos. car parking spaces (i.e. approximately 3%) as provided at Lee Garden Three and 5 nos. car parking spaces out of 612 nos. car parking spaces (i.e. approximately 0.8%) as provided at Lee Garden Eight will be permanently suspended to allow for the opening of tunnel entrances. Since the suspension of parking spaces will account for not more than 2% of total provision at Lee Garden Three and Lee Garden Eight, and because the future parking provision rate of Lee Garden Eight is significantly higher than that of surrounding developments, the traffic impact of their suspension will be negligible.
- 4.5.4 Furthermore, the parking provision during and after construction of Tunnel T3 remains compliance with the prevailing lease requirements, including that required for the Public Vehicle Park at Lee Garden Eight. The no. of suspended parking spaces lies within the range of flexibility (i.e. 5% of total number of spaces) allowed for parking space provision under the lease of Lee Garden Eight.
- 4.5.5 Notwithstanding the above, possible reprovisioning of some of the suspended parking spaces will be further reviewed at detailed design stage.
- 4.5.6 The proposed tunnel will serve vehicular traffic only, and no pedestrian passage will be provided. The Applicant will ensure 24-hour public pedestrian access to the car parks at Lee Garden Three and Lee Garden Eight, which will be open 24 hours.
- 4.5.7 The car parking provisions at Lee Garden One, Lee Garden Two, Lee Garden Three and Lee Garden Eight before and after the constructions of proposed Tunnels T1, T2 and T3, which are subject to further review at detailed design stage, are summarised in Table 4.3 below.

Table 4.3: Car Parking Provisions at Lee Garden One, Lee Garden Two, Lee Garden Three and Lee Garden Eight Before and After the Constructions of Proposed Tunnels T1, T2 and T3

Development	Internal Transport Provision	Before construction of Tunnels T1, T2 & T3	After completion of Tunnels T1, T2 & T3	Difference	
				No.	%
Lee Garden One	Private car parking spaces (Accessible parking spaces included)	200 (0)	187 (0)	- 13 (No change)	- 6.5% (No change)
	Loading / unloading bays	4	4	No change	No change
Lee Garden Two	Private car parking spaces (Accessible parking spaces included)	167 (2)	163 (2)	- 4 (No change)	- 2.40% (No change)
	Loading / unloading bays	6	6	No change	No change
Lee Garden Three	Private car parking spaces (Accessible parking spaces included)	201 (3)	189 (3)	- 12 (No change)	- 5.97% (No change)
	Loading / unloading bays	3	3	No change	No change

Development	Internal Transport Provision	Before construction of Tunnels T1, T2 & T3	After completion of Tunnels T1, T2 & T3	Difference	
				No.	%
Lee Garden Eight	Private car parking spaces (Accessible parking spaces included)	612 (11)	607 (11)	- 5 (No change)	- 0.82% (No change)
	Loading / unloading bays	58	58	No change	No change

Note:

- (1) 6 nos. car parking spaces in Lee Garden Three and 24 nos. car parking spaces in Lee Garden Eight will be temporarily suspended for the construction of Tunnel T3. Please refer to details in Annex A – Traffic Impact Assessment.
- (2) Under separate S.16 Applications (No. A/H6/93 & 94) for the proposed Tunnels T1 and T2 as approved by TPB on 14.2.2025, at least 80% of the provision of car parking spaces at Lee Garden One, Lee Garden Two and Lee Garden Three will be maintained at all time.

4.6 TREE PROTECTION PROPOSAL

- 4.6.1 As shown in **Figures 4.5 and 4.6** below, although the tunnel alignment passes below the dripline of the OVT (LANDSD (LEASED) WCH/1), the tunnel will be constructed entirely underground at approximately -1.35mPD, which is at least 10m below the top of soil of the OVT (approximately +9.30mPD) and approximately 7m below the ground level at Leighton Road (approximately +6.10mPD). In accordance with Paragraph 26 of *Development Bureau Technical Circular (Works) No. 5/2020 – Registration and Preservation of Old and Valuable Trees*, “a zone encompassing the tree along its dripline, projecting vertically from the tree canopy and extending 2m below the ground level and 2m above the top of an OVT, shall be designated as the Tree Protection Zone (“TPZ”).” The tunnel is located outside the statutory Tree Protection Zone (TPZ), and no excavation or works at ground level within the dripline are proposed. In addition, the proposed tunnel will pass at least 8m below the 2m deep TPZ (as defined above by DEVB TC 5/2020). Accordingly, direct impacts on the OVT are anticipated to be insignificant.
- 4.6.2 Notwithstanding the above, precautionary tree protection and monitoring measures are proposed given the OVT status and its existing BRRD condition. These include strict prohibition of ground-level works within the dripline, control of site access to prevent contamination, implementation of BRRD precautionary measures in accordance with GLTMS guidelines, and regular tree monitoring by qualified arboricultural professionals throughout the construction period. An Independent Tree Expert will be engaged at a later stage once the detailed construction methodology for the tunnel has been developed. A further method statement, incorporating the advice of the Independent Tree Expert will be provided prior to the commencement of any construction works. Regular tree inspections, photographic records, and tree risk assessments will be undertaken as appropriate to ensure the health, stability, and long-term preservation of the OVT during and after the construction works. Details can be referred to **Annex B – Tree Protection Proposal**.
- 4.6.3 Furthermore, one of the Applicants, who is also the project proponent for Lee Garden Eight, has proposed a series of protection and rehabilitation measures for the OVT under a separate S.16 application (No. A/H7/188), which was approved on 24 October 2025. These measures are currently being implemented and will not be undermined by the development of Tunnel T3.

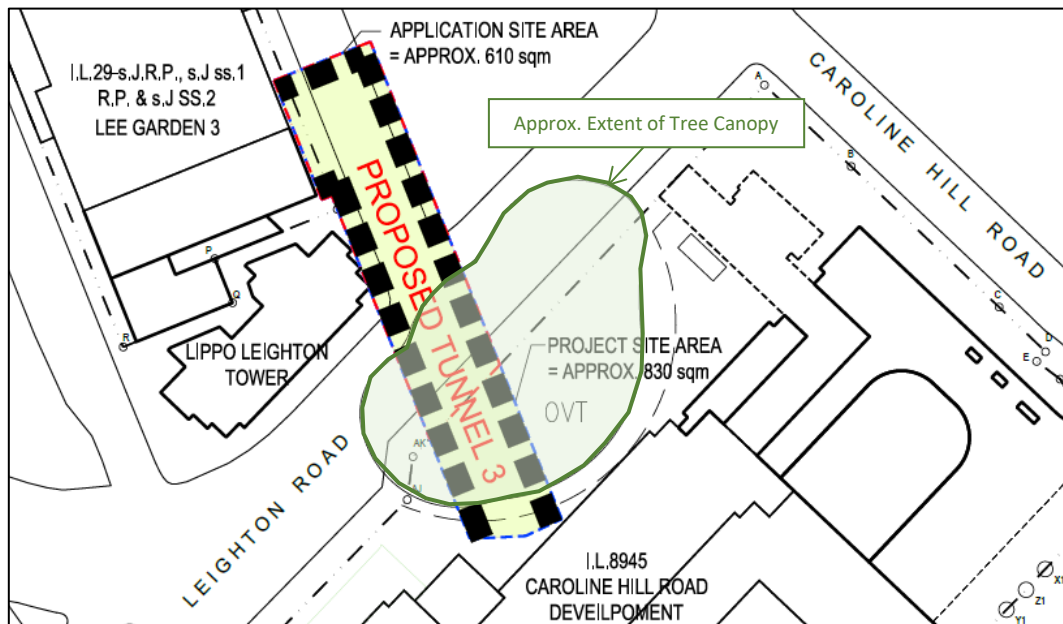


Figure 4.5 – Plan Showing Location of the OVT

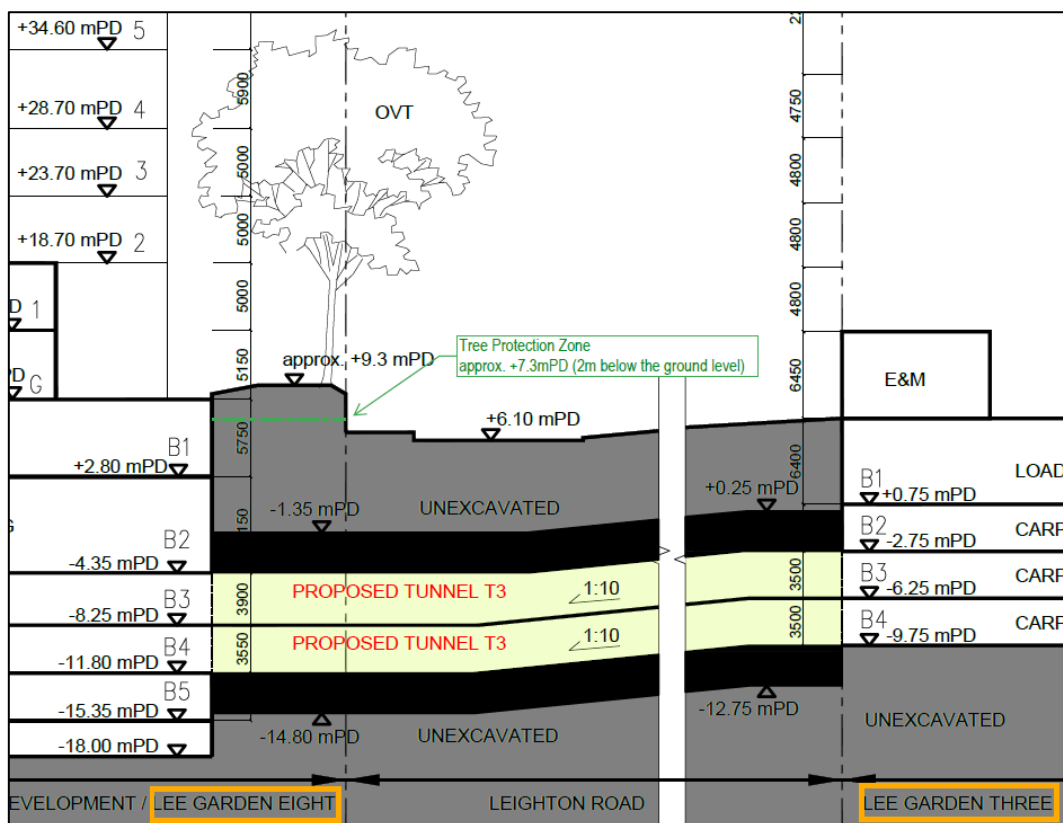


Figure 4.6 – Section Showing the Tree Protection Zone (2m below the Ground Level) of the OVT

5 Technical Assessments

5.1 INTRODUCTION

- 5.1.1 The following is a summary of technical assessments carried out for the proposed underground vehicular tunnel.

5.2 TRAFFIC IMPACTS

- 5.2.1 A Traffic Impact Assessment to assess potential traffic impacts due to the proposed tunnel project during both operational and construction stages has been conducted. It has been concluded that the proposed tunnel will not cause adverse traffic impacts on the local road network, and all the assessed junctions will operate within their capacities during peak hours.
- 5.2.2 The proposed tunnel is supported from a traffic engineering point of view as it is considered to be beneficial to the local area, with the following expected benefits:
- Overall at-grade traffic volume on some key roads and local roads would be reduced, which also help to improve the air quality and pedestrian safety in the area;
 - Accessibility of car parks will be maximized for efficient use of available car parking spaces and way-finding to vacant parking spaces can be taken place internally and thus vehicle queuing at car park entrances and traffic circulation on public roads will be minimized;
 - Availability of route choices for vehicles will help to achieve a better balanced use of roads/junctions' capacities under different road traffic situations; and
 - Access and traffic management will be more flexible for car park operators to manage the ingress and egress of vehicles to suit different traffic conditions in the area.
- 5.2.3 Findings of the Traffic Impact Assessment are contained in **Annex A**.

5.3 TREE IMPACTS

- 5.3.1 While the proposed underground vehicular tunnel will pass beneath the dripline of the OVT, in accordance with Paragraph 26 of *Development Bureau Technical Circular (Works) No. 5/2020 – Registration and Preservation of Old and Valuable Trees*, “a zone encompassing the tree along its dripline, projecting vertically from the tree canopy and extending 2m below the ground level and 2m above the top of an OVT, shall be designated as the Tree Protection Zone (“TPZ”).” The proposed tunnel will be constructed entirely underground at approximately -1.35mPD , which is at least 10m below the top of soil of the OVT (approximately $+9.30\text{mPD}$) and approximately 7m below the ground level at Leighton Road (approximately $+6.10\text{mPD}$), as shown in the floor plan and section in **Figures 4.5 and 4.6**.
- 5.3.2 As all construction works will be carried out entirely underground and no ground-level excavation will take place within the dripline of the OVT, the proposed tunnel is considered to be outside the statutory TPZ. Accordingly, the potential impact on the OVT is expected to be insignificant with the implementation of appropriate precautionary measures (see above).
- 5.3.3 Details of the Tree Protection Proposal are contained in **Annex B**.

5.4 GEOTECHNICAL IMPACTS

- 5.4.1 In accordance with ‘GEO Advice Note for Planning Applications under Town Planning Ordinance (Cap.131): Requirements for a Geotechnical Planning Review Report in support of planning applications’, the proposed tunnel does not require a Geotechnical Planning Review Report under the subject planning application. Nonetheless, the proposed tunnel will not cause damage to the adjacent buildings, structures, land, streets or services. Precautionary measures, such as ground investigations, will be conducted before construction. During construction, regular monitoring of settlement, tilting, vibration

6 Planning Justifications

6.1 IN CONFORMITY WITH OZP INTENTION

- 6.1.1 The proposed Tunnel T3 is situated within the Approved Causeway Bay Outline OZP No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21.
- 6.1.2 The majority of the Project Site (i.e. Application Site of approximately 610 m² or 73.5%) falls within areas shown as 'Road' on the respective OZPs, whilst the remaining portion of the Project Site (i.e. approximately 220 m² or 26.5%) falls within an area zoned "C(2)" on the Approved Wong Nai Chung OZP No. S/H7/21.

Area Shown as 'Road'

- 6.1.3 The areas shown as 'Road' on the OZPs are designated for road (including vehicular) transportation purposes. According to the TPB 'Definition of Terms', the definition of "Road":
- "Includes the whole or any part of any square, court or alley, highway, lane, road, road-bridge, flyover, underpass, tunnel, footpath, footbridge, path, pedestrian subway, pedestrian area, travelator or passage whether a thoroughfare or not".*
- 6.1.4 Therefore, the proposed Tunnel T3 is considered to be a development which does not deviate from the purpose of the areas shown as 'Road' on the OZPs.

"C(2)" Zone

- 6.1.5 The planning intention of the "C(2)" zone is primarily for commercial development, which may include uses such as office, shop, services, place of entertainment, eating place and hotel, functioning as territorial business/financial centre(s) and regional or district commercial/shopping centre. The proposed Tunnel T3, together with the Tunnel T1 and Tunnel T2 (proposed elsewhere), form part of an integrated car park network within the commercial development of the Lee Gardens Area. This is considered to be an ancillary use to the commercial development within the "C(2)" zone and can therefore be regarded as permitted as of right.
- 6.1.6 Therefore, the proposed Tunnel T3 project does not require a planning permission from the TPB, nor submission of layout plan for the approval of the TPB in area zoned "C(2)".
- 6.1.7 Since the proposed Tunnel T3 only involves the use of underground space as an alternative to at-grade vehicular routes, no land use incompatibility with the surrounding development context is anticipated.
- 6.1.8 The proposed Tunnel T3 set out in this application contains a number of significant planning merits. These and other considerations are described below.

6.2 REDUCTION OF AT-GRADE TRAFFIC DEMAND

- 6.2.1 The proposed Tunnel T3 will serve as an alternative underground route, diverting vehicles accessing Lee Garden One, Lee Garden Two, Lee Garden Three and Lee Garden Eight from the at-grade to underground level. It is estimated that the traffic flows will be reduced along some key road links, such as Leighton Road, and local roads, including Yun Ping Road, Hoi Ping Road, Sunning Road, Lan Fong Road and Lee Garden Road, as well as their road junctions.
- 6.2.2 With the proposed Tunnel T3 implemented, route choices will be available to help achieve a better balanced use of roads and junctions' capacities under different road traffic situations.
- 6.2.3 The diversion of traffic from the at-grade to underground level will reduce the overall at-grade traffic flow.
- 6.2.4 Upon completion of Lee Garden Eight and other development projects in the vicinity, higher