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Causeway Bay

Response to Comments

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1.	PLANNING DEPARTMENT HONG KONG DISTRICT PLANNING OFFICE MS. FARICA NG (TP/HK10) Ref. / Date: email dated 11 August 2026, 18:12 Received Date: 11 August 2026 I refer to the captioned planning application. Please find the attached departmental comments. Comments of Chief Engineer/Hong Kong & Islands, Drainage Services Department (contact officer: Mr. Icy TO, tel: 3101 2364) Based on our drainage record, there are several stormwater/sewage drains passing the proposed subject site. It is the developer's responsibility to identify/locate the existing government sewers and stormwater drains to which drainage connections from his site are to be proposed. The AP should verify the existence of any drains/sewers/utilities and also their exact locations, levels and alignments on site in order to ascertain the positions and levels of the proposed manholes and the associated connection works. The AP should also verify that the existing government drains/sewer, to which connections are proposed, are in normal working conditions and capable for taking the discharge from the site. Besides, for any excavation works over or in close vicinity to existing government drains/sewers, the AP should notify DSD in writing at least 14 working days before backfilling the excavation works and arrange joint site inspection with DSD prior to covering up. The PM is also reminded that any person wilfully, except with the permission in writing of the Authority, or negligently damages, alters, disconnects or otherwise interferes with any public sewer or drain or any connection therewith, shall be guilty of an offence under Section 6 of Public Health and Municipal Services Ordinance (Cap 132).	Noted and thank you. Noted and thank you.

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	<u>Comments of Director of Environmental Protection</u> <u>(contact officer: Ms. Virginia WONG, tel: 2835 1109)</u> Please find our advice to the application as below: 1. The applicant is advised to consider using ‘drill and excavation’ method for the tunnel excavation; 2. The applicant is reminded to strictly comply with relevant environmental legislation / guidelines during design, construction and operation of the proposed underground vehicular tunnels. <u>Comments of Chief Estate Surveyor/Development Control</u> <u>(contact officer: Sarah CHEUNG, tel: 3793 4603)</u> With reference to the RtC dated on 30 January 2026, the Applicant agreed that “a further method statement, incorporating the advice of the Independent Tree Expert will be provided prior to the commencement of any construction works”. The Lot Owner is reminded to submit the method statement prior to the construction of tunnel underneath the dripline of the OVT to Lands Department for consideration. <u>Comments on Chief Highway Engineer/Hong Kong</u> <u>(contact officer: Iris CHEUNG, tel: 2231 5618)</u> This office has the following comments from highways maintenance viewpoint: 2(a) It is understood that the proposed two-level tunnel will connect the future basement carpark at Lee Garden Eight with the existing private carpark at Lee Garden Three, which is currently operating under its own clear width and headroom limits. As	The ‘drill and excavation’ method was proposed in the project proposal. Please refer to Section 4.4 of the Planning Statement. The detailed construction method will be reviewed and developed in a future stage. Noted and thank you. Noted and thank you. Noted and thank you.

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	such, the requirements stipulated in the Structure Design Manual for Highways and Railways should not be applicable. (b) We agreed that the tunnel will be constructed entirely underground at approximately -1.35mPD, which is about 10m below the existing ground level of the OVT. Comments of the Executive Secretary (Antiquities & Monuments)1, Antiquities and Monuments Office (AMO): <u>(contact officer: Ms. Phoebe TANG, Tel: 2655 0836)</u> Comments of AMO from the heritage conservation perspective are as follows: 2. The proposed underground vehicular tunnel is underneath the non-graded portion of the masonry wall (Slope Feature No. 11SW-B/FR 190) facing Leighton Road and is in the vicinity of the Masonry Wall and Earthenware Pipes at Caroline Hill Road (with Slope Feature Nos. 11SW-B/FR 193 and 11SW-B/FR 32), a Grade 3 historic structure (collectively as “Graded Masonry Wall”), and Main Building of Po Leung Kuk at No. 66 Leighton Road, a Grade 1 historic building (the Graded Building). 3. We appreciate that the Applicant has supplemented a section of Heritage Impact in the current Planning Statement to assess the potential adverse physical impacts of the proposed development on the Graded Structure and the Graded Building. According the Section 5.7 of the Planning Statement, the Applicant has assessed that the impact on the Graded Structure and the Graded Building is expected to be insignificant, and that regular monitoring and inspection of both the Graded Structure and the Graded Building will be conducted during the construction stage. Should the subject application be approved by the Town Planning Board, AMO will offer comments on the works arising from the proposed development upon receipt of referrals from the respective departments.	Noted and thank you. Noted and thank you. Noted and thank you.

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4.	As for the non-graded portion of the masonry wall which is required to be retained under Special Condition Clause (3) of the land lease of the IL 8945, and which will be directly affected by the proposed development, we shall defer to the relevant authorities, e.g. Lands Department, in providing comments.	Noted and thank you.
2.	PLANNING DEPARTMENT HONG KONG DISTRICT PLANNING OFFICE MS. FARICA NG (TP/HK10) Ref. / Date: email dated 14 August 2026, 17:25 Received Date: 14 August 2026 Please find the attached departmental comments. Comments of Chief Building Surveyor/HKE&H, Buildings Department (contact officer: Ms. Fiona TONG, tel: 2626 1423) <u>Major Comments on the Application/Main Reasons of Objection:*</u> 1. It is noted that the proposed tunnel is for vehicular traffic. In general, if the proposed tunnel to be erected at Government land, it is not accountable for GFA calculation under the Buildings Ordinance (BO). 2. As the proposed tunnel is connected to buildings on private lots and be constructed under streets, exemption under section 31(1) of the BO to permit such structure to project over / under streets will be required. Exemption under section 31(1) of the BO may be given provided that, among others, commercial activities generally are not allowed unless with planning permission and specific justified public benefit acceptable to relevant government departments, and are accountable for GFA calculation under OZP. PNAP APP-38 refers.	Noted and thank you. Noted and thank you.

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	3. Detailed checking for compliance with the BO will be made upon building plans submission stage. 4. My previous reply for the pre-submission enquiry is still pertinent. Comments of Director of Food and Environmental Hygiene (Contact officer: Ms. Stella Kwok, tel: 3141 1229) (i) If any Food and Environmental Hygiene Department's (FEHD) facility is affected by the development, FEHD's prior consent must be obtained. (ii) If provision of cleansing service for new roads, streets, cycle tracks, footpaths, paved areas etc, is required, FEHD should be separately consulted. Prior consent from FEHD must be obtained. (iii) No environmental nuisance should be generated to the surroundings. Also, arrangement shall be made to dispose any waste so generated from commercial / trading activities properly at own expenses. (iv) Proper licence / permit issued by FEHD is required if there is any food business / catering service / activities regulated by the Director of Food and Environmental Hygiene under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public. Comments of Commissioner of Police (Contact officer: Mr. Raymond LAM, tel: 3660 1887) It is advised that the proposal should not cause adverse traffic impact to the local community and each Temporary Traffic Arrangement (TTA) involving works on footpath and/or carriageway should be submitted to this office and Transport Department for comment before implementation.	Noted and thank you. Building plans submissions will be made at a later stage. Noted and thank you. Noted and thank you. Noted and thank you. Noted and thank you. Noted and thank you. Noted and thank you.

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	District Planning Officer/Hong Kong, Planning Department (contact officer: Ms. Farica NG, tel: 2231 4929) We have the following observations/comments from district planning perspective: (a) Please clarify if the major development parameters in Table 4.2 of the Planning Statement apply to each level of the proposed tunnel (i.e. B3/F and B4/F), or to the tunnel works as a whole. (b) It is noted that the minimum internal clear width of proposed tunnel is 5m (including a minimum clear width of 4m for driveway). Please clarify the purpose of the remaining 1m, such as maintenance access, structural clearance, emergency refuge, service zone or pedestrian movement, etc. Please clarify whether pedestrian access is allowed or prohibited within the tunnel. If any pedestrian footpath is proposed, the driveway and footpath should be clearly annotated on all relevant plans, including the floor plans. (c) Please provide a pedestrian circulation network among the Lee Garden developments and their operation hours.	The minimum internal clear width, gradient and minimum clear headroom as stated in Table 4.2 of the Planning Statement refer to the proposed tunnel at each level, whilst the rest of the parameters refer to the proposed two-level tunnel as a whole. Table 4.2 of the Planning Statement has been updated accordingly. The minimum 5m internal clear width of the proposed tunnel includes 4m clear width of the carriageway and a 500mm horizontal kerb clearance between the edge of the carriageway and the structure / wall on both sides. The proposed tunnel in the subject application will serve vehicular traffic only, and no pedestrian passage will be provided. As discussed in paras. 1.2.10 – 1.2.11 of the Planning Statement, the proposed tunnel forms part of Hysan’s overall plan to enhance vehicular and pedestrian connectivity in Causeway Bay as a whole. The covered footbridges and a walkway cover as gazetted under the Roads (Works, Use and Compensation) Ordinance (Cap. 370) will provide seamless weather-proof pedestrian routes from Causeway Bay Mass Transit Railway (MTR) Station to various commercial developments (Figures 1.3a – 1.3b refer). The existing operation hours of the commercial developments in Lee Gardens Area, including Lee Garden One – Six, are as follows. Shops: Sunday - Thursday: 1000 - 2200 Friday, Saturday, and the Eve of Public Holidays: 1000 - 2300

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	(d) The applicant stated that the proposed tunnel would bring benefit to ingress and egress traffic of Lee Garden One and Lee Garden Three from/to the south (i.e. Link Road) (Para. 4.5.3 of the Planning Statement refers). Understand the opening hours of the car park at Lee Garden Three is currently 24 hours and the opening hours of the future car park at Lee Garden Eight will also be 24 hours. Please supplement the opening hour of the car park at Lee Garden One. (e) In view of the cumulative tunnel proposals within the Lee Garden area, please clarify whether the proposed tunnel would alter queueing patterns at Hysan Avenue, Hoi Ping Road, Pennington Street, Leighton Road, Sunning Road and associated access points, and provide any proposed traffic management / wayfinding measures. Please also provide a full operational picture of the connected carparking system by indicating all ingress/egress, relevant signage or parking guidance arrangements to explain how drivers would be directed at the future underground parking network.	Restaurants: Sunday - Thursday: 1100 - 2300 Friday, Saturday, and the Eve of Public Holidays: 1100 - 2400 The operation hours of Lee Garden Eight will be subject to future operational needs. The proposed tunnel in the subject application will serve vehicular traffic only, and no pedestrian passage will be provided. Therefore, no change to the existing and planned pedestrian circulation network is proposed in the subject application. 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. This has been supplemented in para. 4.5.6 of the Planning Statement. The opening hours of the car park at Lee Garden One are 7:30am to 12:30am. This has been supplemented in para. 4.3.2 of the Planning Statement as per your request. With the basement car parks further linked by Tunnel T3, the available car parking spaces within Lee Garden One, Lee Garden Two, Lee Garden Three and Lee Garden Eight can be shared for use by the vehicles. As a result, utilization of available car parking spaces can be maximized while the way-finding to vacant spaces can take place internally. Thus, vehicle queueing at car park entrances and traffic circulation on public roads will be minimized. Regarding the full operational picture, please refer to the revised Figure 4.4 of the Planning Statement, which showcases the overall traffic management strategy and the anticipated traffic re-routing upon completion of the proposed tunnel.

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	(f) Sec. 4.5 – - Please provide a comprehensive summary table of the car parking provision at Lee Garden One, Two, Three and Eight before and after construction of tunnels T1, T2 and T3. The table should also provide detail breakdown of private car parking space, accessible parking spaces, loading/unloading areas, and any temporarily or permanently suspended parking spaces “Link Road” has been mentioned a few times, please annotate it on Figures 4.4a to 4.4c. <i>Traffic and Transport</i> (g) Based on the Traffic Impact Assessment (TIA) submitted, it is noted that 6 car parking spaces in Lee Garden Three and 5 car parking spaces in Lee Garden Eight would be permanently suspended after the construction of Tunnel T3. Based on our recent site visit, it is noted that one of the car parking spaces to be affected on B4/F in Lee Garden Three is an accessible car parking space. Please confirm. (h) Please advise the possible location and timeframe for reprovision of affected 11 parking spaces. <i>Construction and Traffic Management</i> (i) W.r.t. para. 7.2.2 of the TIA submitted, it is noted that “if public good vehicles and/or coach parking spaces are affected during construction stage, the ancillary loading bays would be temporarily converted into the affected public parking spaces to maintain the 24-hour provision for the public needs, if necessary.” Based on Figure 7.1 in the TIA, a public MGV/HGV parking space and 3 coach parking spaces in Lee Garden Eight would be temporarily affected during the construction, please advise the location of the ancillary loading bays that would be temporarily converted into the affected public	The summary of car parking provision at Lee Garden One, Lee Garden Two, Lee Garden Three and Lee Garden Eight has been supplemented in para. 4.5.7 and Table 4.3 of the Planning Statement. “Link Road” has been annotated in the relevant figures. The affected accessible car parking space will be relocated on the same floor in Lee Garden Three by suspending a normal car parking space, as presented in Drawing 7.1 of the TIA. The possible reprovision of the affected spaces will be further reviewed at detailed design stage. If temporary relocation is necessary during construction stage, it would be re-provided at the same floor of Lee Garden Eight by converting the HGV loading bays into the affected parking spaces. The details of temporary relocation will be reviewed at detailed design stage and submitted for approval by TD prior to the construction works.

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	parking spaces to maintain the 24-hour provision for the public needs (within Lee Garden Eight?). (j) Please clarify whether the proposed construction programme for Tunnel T3 would overlap with any construction / fit-out / traffic arrangements associated with Lee Garden Eight and, if so, provide details of the interfacing and mitigation measures. Further Comments of Chief Estate Surveyor/Development Control (contact officer: Sarah CHEUNG, tel: 3793 4603) Regarding public comment concerning the OVT:- it would be desirable if the Applicant can provide the relevant information to address the concerns from the public in the Planning Application.	The construction of proposed Tunnel T3 is anticipated to commence upon completion of Lee Garden Eight. Please refer to section 7 of the Planning Statement. The applicants' response to the concerned public comment is as follows: Thank you for your comment. The Applicants have acknowledged that the tunnel alignment passes below the dripline of the OVT (LANDSD (LEASED) WCH/1). Nevertheless, the tunnel will be constructed entirely underground at a level of 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 addition, 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. The Applicants recognise the exceptional heritage, landscape and ecological value, as well as the existing Brown Root Rot Disease (BRRD) condition of the concerned OVT. Therefore, notwithstanding the insignificant potential impacts anticipated on the OVT, precautionary tree protection and monitoring measures are proposed. 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

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3.	PLANNING DEPARTMENT HONG KONG DISTRICT PLANNING OFFICE MS. FARICA NG (TP/HK10) Ref. / Date: email dated 18 August 2026, 17:41 Received Date: 18 August 2026 Please find the attached departmental comments. Comments of Head of Geotechnical engineering Office, Civil Engineering and Development Department (contact officer: Ms. Florence KO, tel: 2762 5369)	with GLTMS guidelines, and regular tree monitoring by qualified arboricultural professionals throughout the construction period. On top of these measures, 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 found in Annex B – Tree Protection Proposal. 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 by Town Planning Board on 24 October 2025. These measures are currently being implemented and will not be undermined by the development of Tunnel T3. In view of the above, the potential impact on the OVT is expected to be minimal.

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	Please remind the applicants that the proposed tunnels shall be designed and constructed to the relevant geotechnical standards / guidelines. The construction of the proposed vehicular tunnel shall not impair the safety or cause damage to the adjacent buildings, structures, land, streets or services. Comments of Director of Fire Services, Fire Services Department (contact officer: Mr. QIU Yi, tel: 2733 5845) Detailed fire services requirements will be formulated upon receipt of formal submission of general building plans. The EVA provision in the captioned work shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by the Buildings Department. Nevertheless, shall the proposed work affect any EVA provision of nearby buildings, the consultant should make separate enquiry to this department to ensure work feasibility. Moreover, if the tunnel is constructed using a Tunnel Boring Machine (TBM), this Department shall be notified at least one year prior to the commencement of construction works to facilitate the formation of an Emergency Pressurized Team. District Planning Officer/Hong Kong, Planning Department (contact officer: Ms. Farica NG, tel: 2231 4929) Please make responses to the public comments received under the current planning application in the next submission of further information. <i>Public Comment – 1</i> I have reservations regarding the proposed tunnel alignment passing directly beneath the canopy and dripline area of the existing Old and Valuable Tree (OVT) LANDSD(LEASED) WCH/1. Although the applicant indicates that the proposed works would be located outside the statutory Tree Protection Zone, the OVT is already	Noted and thank you. Noted and thank you. Noted and thank you. Noted and thank you. The Applicants' response to the concerned public comment is as follows: Thank you for your comment. The Applicants have acknowledged that the tunnel alignment passes below the dripline of the OVT (LANDSD (LEASED) WCH/1). Nevertheless, the tunnel will be constructed

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	known to be affected by Brown Root Rot Disease and therefore may be more vulnerable to external disturbances. The planning submission has not sufficiently demonstrated that indirect impacts arising from underground excavation, settlement, groundwater regime changes or vibration can be completely avoided. Given the exceptional heritage, landscape and ecological value of the OVT, the precautionary principle should be adopted. In my view, the application should not be approved unless the applicant can provide robust evidence, verified by an independent tree expert, confirming that the tunnel construction and operation would pose no unacceptable risk to the tree's long-term health, survival and structural stability.	entirely underground at a level of 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 addition, 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. The Applicants recognise the exceptional heritage, landscape and ecological value, as well as the existing Brown Root Rot Disease (BRRD) condition of the concerned OVT. Therefore, notwithstanding the insignificant potential impacts anticipated on the OVT, precautionary tree protection and monitoring measures are proposed. 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. On top of these measures, 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 found in Annex B – Tree Protection Proposal. 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 by Town Planning Board on 24 October 2025. These measures are currently being implemented and will not be undermined by the development of Tunnel T3.

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	<i>Public Comment – 2</i> Dear TPB Members, Strong Objections. The additional tunnel is a further encroachment and privatization of the ground beneath our streets. The paper waffles on about green bus stops and illegal parking. The proposed tunnel will in no way improve this situation. Public transport passengers will derive zero benefit. As for the illegal parking, this has nothing to do with the provision of parking spaces. This is all about avoiding paying fees and convenience. As my neighbourhood is similar to Causeway Bay with many visitors, I note that there is some form of car hire operations related to the double and triple plate vehicles. These vehicles avoid using off street parking facilities whenever possible and loiter on streets where there is minimal control of illegal parking. They will not be attracted into parking floors down under Lee Garden 8 when the customer is in another mall. Hysan's focus is on maximizing revenue from a combined parking facility and has nothing to do with improving conditions on our streets. There is no mention of what impact additional excavation and filling in of the ground between tall towers has on the natural drainage capacity of the ground beneath the streets that is traditionally less built over. This developer has already robbed the community of the promised 6,000sq.m Open Space at the site and replaced it with covered space, the leftover spaces between the three towers and a lot of footbridges. There is no justification to allow it to further exploit the public realm. Mary Mulvihill	In view of the above, the potential impact on the OVT is expected to be minimal. Thank you for your comment. The Applicants would like to supplement as follows. <i>Traffic Impacts</i> As stated in the Planning Statement (Section 5.2), a Traffic Impact Assessment to assess potential traffic impacts due to the proposed tunnel project during both operational and construction stages has been conducted. The TIA concludes 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. 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 will be reduced, which would 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". Should there be illegal parking, the Applicants assume that enforcement action will be undertaken by relevant law enforcement authorities in accordance with relevant laws and regulations.

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4.	PLANNING DEPARTMENT HONG KONG DISTRICT PLANNING OFFICE MS. FARICA NG (TP/HK10) Ref. / Date: email dated 20 August 2026, 17:51 Received Date: 20 August 2026 Please find the attached departmental comments. Comments of Head of Greening, Landscape and Tree Management Section, Development Bureau (contact officer: Ms. Flora LEUNG, tel: 3509 7367) It is noted that the proposed tunnel will be located at least 10m below the soil surface of the OVT (LANDSD(LEASED)WCH/1(HKP WCH/1)), and routine quarterly monitoring will be conducted by an expertise in tree risk assessment and related tree inspection works (with qualifications stipulated in section 3.6 of Annex B). Considering the OVT is infected by brown root rot disease and the proposed excavation work directly underneath the OVT is of large scale, it is recommended to seek comments from an independent tree expert on the subject proposal and assessment of the potential impacts on the OVT.	<i>Drainage Impacts on Drainage Capacity</i> The tunnel proposals have been circulated to Drainage Services Department, Civil Engineering and Development Department (CEDD) and other relevant Government Departments. None has expressed any concerns regarding adverse impacts on subsurface ground conditions or drainage capacity. Noted and thank you. 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. Please refer to para. 4.6.2 of the Planning Statement.

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	Besides, close monitoring on the tree health and stability by an independent tree expert is recommended, in addition to the routine quarterly tree assessment, for tree protection and public safety. Comments of Director of Electrical and Mechanical Services (contact officer: Mr. John CHEUNG, Tel: 2808 3113) In the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable under the mentioned document should approach the electricity supplier (i.e. HK Electric) for the requisition of cable plans to find out whether there is any underground cable within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the “Code of Practice on Working near Electricity Supply Lines” established under the Regulation when carrying out works in the vicinity of the electricity supply lines. Comments of District Land Officer/Hong Kong East, Lands Department (Contact person: Ms. Phoebe TAI, tel: 2835 1635) <u>Land Status</u> 2. The proposed underground vehicular tunnel (“Proposed T3”) connects Lee Garden Three (IL 29 s.J ss.2 & s.J RP and IL 29 s.J ss.1 RP, “the Lots of Lee Garden Three”) and Lee Garden Eight (IL 8945) via the unleased and unallocated government land underneath Leighton Road and Sunning Road. The relevant conditions under the leases governing the respective lots are summarized as follow: IL 29 s.J ss.2 & s.J RP and IL 29 s.J ss.1 RP (Lee Garden Three) The Lots of Lee Garden Three are held under Government lease of IL 29 as varied or modified by an Agreement dated 7 June 1934, which is virtually unrestricted	This will be addressed in the further method statement mentioned above, which will be provided prior to the commencement of any construction works. Noted and thank you. The Applicant will consult the electricity supplier accordingly and ensure compliance with relevant regulations. Noted and thank you.

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	except the standard rate and range clause and non-offensive trade clause, with a lease term of 982 years commencing from 25.6.1860. A License permitting the five offensive trades (i.e. Oilman, Tavern Keeper, Victualler, Butcher and Sugar-baker) on the Lots was issued on 2 December 1983. A Modification Letter was executed on 10 January 2025 for provision of the footbridge connecting Lee Garden Three and Lee Garden Five. For information, lease modification for the proposed tunnel T1 across Hysan Avenue linking up Lee Garden Three and Lee Garden One is under processing. In addition, it is noted that some of the land status information mentioned in section 1.3 of the PS are not accurate:- (a) the lots of Lee Garden Three shall also include IL 29 s.J ss.1 RP; (b) the lease modification for Tunnel T1 has been completed and the modification letter was executed on 7.5.2026; and (c) the special condition referred in para. 1.3.5 shall be SC(13)(k) instead of SC(13)(j). <u>Preservation of Masonry Walls and Earthenware Pipes</u> 3. By comparing figure 1.1 of the PS and PLAN II annexed to the Conditions of IL 8945 ("PLAN II"), it is noted that the Proposed T3 will pass beneath the existing Masonry Wall and Earthenware Pipes as defined under Special Condition (SC) No. (2)(a)(i) of the Conditions. The Applicant shall observe SC No. (3) of the Conditions regarding the preservation of Masonry Walls and Earthenware Pipes. Comment from AMO should be sought on whether the proposed works would affect the Masonry Walls and Earthenware Pipes. Pursuant to SC No. (3)(b) of the Conditions, the Applicant shall prior to the commencement of any works which may affect the Masonry Walls and Earthenware Pipes at his own expense submit to the AMO a conservation management plan on the	Para. 1.3.2 of the Planning Statement has been revised to include IL 29 s.J ss.1 RP. Para. 1.3.2 of the Planning Statement has been revised accordingly. Para. 1.3.5 of the Planning Statement has been rectified. This application has been circulated to AMO for review and comment. At AMO's suggestion, Section 5.7 on Heritage Impacts was included in the Planning Statement. The Applicant will submit any further information as required for relevant B/Ds' consideration during detailed design.

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	conservation of the Masonry Walls and Earthenware Pipes and obtain the written consent of the Director of Lands ("the Director"). <u>The Cables, the Cable Installations and the Cable Reserve Areas</u> 4. Pursuant to SC No. (8) of the Conditions, there are in existence some electricity transmission cables below the ground level of the Green Areas and the adjacent or adjoining Government land with their approximate alignments shown by green lines, red lines and purple lines (collectively "the Cables") on PLAN II. By comparing figure 1.1 of the PS, PLAN I annexed to the Conditions of IL 8945 ("PLAN I") and PLAN II, it is noted that the Proposed T3 would encroach on the Green Areas as shown on PLAN I and potentially affect the red lines (i.e. 11 kilovolts cable) and green lines (i.e. 132 kilovolts cable) as shown on PLAN II. The Applicant is reminded that according to SC No. (8)(d)(i) & (8)(d)(ii) of the Conditions, no building or structure or support or foundation for any building or structure shall be constructed in those portions of Green Areas within a distance of 1.0 metre in all directions measured from the centre line of the 132 kilovolts cable or 0.3 metre in all direction measured from the centre line of the 11 kilovolts cables and the 22 kilovolts cables or from the outer surface of the cable works, structures, facilities and installations associated with the Cables (collectively "the Cable Reserve Areas"). The Applicant is required to clarify and confirm whether the Proposed T3 would affect the Cables and the Cable Reserve Areas. 5. Besides, the Applicant should also observe SC No. (8)(e) which stipulates that prior to the commencement of any works whatsoever within a distance of 3.0 metres in all directions measured from the centre line of the Cables or the outer surface of the Cable Installations, the lot owner shall consult the Hongkong Electric Company Limited so as to ensure that any such works will not damage, or in any way interfere with or endanger the safe operation and structural integrity of any part or parts of the Cables and the Cable Installations and if required by the Director, the lot owner shall, at the lot owner's own expense take such precautions as may be required by the Power Company to ensure	Noted and thank you. The Applicants will carry out a utilities survey at detailed design stage to ensure that the proposed Tunnel T3 works will not affect the Cables and the Cable Reserve Areas. Noted. The Applicants will consult the Hongkong Electric Company Limited accordingly.

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	written approval of the Director in accordance with SC No. (13)(k) of the Conditions. 8. According to the PS, the Applicant alleged that direct impacts of the Proposed T3 on the OVT are anticipated to be insignificant as the Proposed T3 will be constructed entirely underground at approximately -1.35mPD, which is at least 10m below the existing ground level of the OVT, and falls outside the statutory Tree Protection Zone. Notwithstanding the above and the precautionary and monitoring measures proposed in the PS, it is noted that the OVT suffers from the Brown Root Rot Disease as mentioned in para 2.2.4 of the PS and therefore the impact on the OVT should be carefully assessed. We defer to the relevant bureaux / departments (B/Ds) to consider and comment on the acceptability of the proposed structures / works underneath the OVT. <u>Parking Spaces</u> 9. According to chapter 7 of the Traffic Impact Assessment at Annex A of the PS, car parking spaces and some goods vehicles and/or coach parking spaces will be temporarily suspended during the tunnel construction stage. Besides, a total of 11 nos. car parking spaces as provided at Lee Garden Three and Lee Garden Eight will be permanently suspended for the opening of tunnel entrances after completion of tunnel work. The Applicant is required to observe the parking requirements at SC No. (43) of the Conditions and demonstrate that the parking provision during and after construction complies with the respective parking requirements. TD should be consulted on the traffic impact during and after the completion of construction.	As stated in Section 4.6 of the Planning Statement and Annex B ‘Tree Protection Proposal’, precautionary tree protection and monitoring measures are proposed given the OVT’s status in order to specifically address its existing Brown Root Rot Disease (BRRD) condition. The proposed number of car parking spaces required under SC No. (43) of the Conditions for IL8945 (Lee Garden Eight) to be suspended falls within the range of flexibility allowed under SC No. (46) of the Conditions (i.e. 5% of the total number of spaces) during and after construction: <table><tr><th></th><th>Total no. of CPS (Required under SC(43))</th><th>Total no. of CPS (Flexibility under SC(46))</th><th>Permanently suspension upon completion</th></tr><tr><td>LG3</td><td>N/A</td><td>N/A</td><td>6</td></tr><tr><td>LG8</td><td>512</td><td>±25</td><td>5 [1%]</td></tr></table> The subject submission has been circulated to TD for review and comment.			Total no. of CPS (Required under SC(43))	Total no. of CPS (Flexibility under SC(46))	Permanently suspension upon completion	LG3	N/A	N/A	6	LG8	512	±25	5 [1%]
	Total no. of CPS (Required under SC(43))	Total no. of CPS (Flexibility under SC(46))	Permanently suspension upon completion												
LG3	N/A	N/A	6												
LG8	512	±25	5 [1%]												

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	10. If the planning application is approved by the Town Planning Board, the applicant is required to apply to LandsD for a lease modification and/or other appropriate land documentation in respect of the affected lots to take forward the proposal. However, there is no guarantee that such application(s) will be approved. Such application(s), if approved, would be subject to such terms and conditions, including payment of administrative fee(s) and premium, as might be imposed by LandsD, in the capacity of the landlord. <u>Other Comments</u> <u>Gazettal under the Roads (Works, Use and Compensation) Ordinance (Cap. 370) ("the Ordinance")</u> 11. According to the PS, the construction of the Proposed T3 will take place solely underground. The Applicant shall clarify whether the construction would involve any road closure. Subject to the clarification from the Applicant and the advice from TLB, the Proposed Tunnel 3 may have implications under the Ordinance. In the event that gazettal for the proposed road works under the Ordinance is required, the Applicant shall be liable to pay the Government all relevant costs including compensation.	The Applicants will proceed with the application for lease modification and/or other appropriate land documentation upon approval of the planning application.
5.	PLANNING DEPARTMENT HONG KONG DISTRICT PLANNING OFFICE MS. FARICA NG (TP/HK10) Ref. / Date: email dated 21 August 2026, 11:28 Received Date: 21 August 2026 Please find the attached comments from WSD. Comments of Chief Engineer/Construction, Water Supplies Department (contact officer: Mr. Terry LAW, tel: 2152 5737)	As discussed in Section 4.4 of the Planning Statement, the "Drill and Excavation Method" with a launching point from Lee Garden Eight has been proposed for the construction of the tunnel in order to avoid any excavation work on at-grade public roads. Thus, no road closure will be required during construction. Please note that according to the TIA, the proposed Tunnel T3 will not cause adverse traffic impact to the local road network. With the proposed Construction Traffic Management Scheme (i.e. Section 7.5 of the TIA refers), impact on the surrounding road conditions will be minimized.

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	Please note that there are some existing fresh water mains within the site and are affected by the proposed tunnel. Free access should be allowed for WSD at any time to carry out operation and maintenance of these water mains. In case the project proponent considers that diversion of these water mains is required, they should study the feasibility of diverting these water mains. If diversion is considered feasible, the project proponent should submit their proposal for WSD's consideration and approval. The water mains diversion work shall be carried out by the project proponent at their own cost to the satisfaction of WSD. WSD will only carry out the connection works to the existing network and the associated connection cost should be borne by the project proponent. Please find attached partprint of our mains record plans showing the existing water mains in the vicinity of the captioned site for your information. Please note that the alignments of the water mains are indicative only. The exact lines and levels of our water mains should be established by hand dug trial pits on site if they are of significance to your works. Some changes might have been made to the information shown on the drawings in the course of time and that digging of trial holes to ascertain the exact alignment and depth of water mains would still be necessary before any road excavation.	Noted. The tunnel level is lower than the water mains, so that WSD access will not be affected.
6.	PLANNING DEPARTMENT HONG KONG DISTRICT PLANNING OFFICE MS. FARICA NG (TP/HK10) Ref. / Date: email dated 26 August 2026, 9:41 RECEIVED DATE: 26 AUGUST 2026 Please find the attached comments from TD. Comments of Commissioner of Transport, Transport Department (contact officer: Ms. Priscilla SUM, tel: 2829 5408)	Noted with thanks.

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	1. The proposed tunnel T3 would inevitably change the existing traffic pattern of the proposed carparks of Lee Garden (LG)8, LG3, LG2 and LG1. Therefore, appropriate traffic management plans for the carparks cluster including the queueing arrangement, signage arrangement, the internal traffic circulation across different carparks, etc. should be developed for effective management of the traffic arriving/leaving the carparks. 2. We have no comment from traffic engineering viewpoint on the proposed minimum internal clear width of driveway (i.e. 4m) and min. clear headroom at tunnel T3 (i.e. 2.4m) subject to compliance with the following: - (i) The driveway shall only be one-way only at each level within the tunnel and complies with relevant requirements at TPDM and PNAP App-111; and (ii) The min. clear headroom of the proposed tunnel shall be in consistent with the min. clear headroom at the carpark floors in both Lee Garden Three and Lee Garden Eight. <u>Planning Statement</u> 4. Refer to Section 6.2 – It is noted that the recommended benefits / reduction on at grade traffic flows are based on the assumptions of the drivers' patterns, which may vary on different drivers' behaviour and the information of the driver on hand (i.e. the knowledge of the locations of the tunnels inside carpark, actual road traffic condition, time difference between the travelling within carpark and outside carpark, etc) and the traffic management of the carparks. Besides, the assumed re-routing will also increase the right turn traffic at junction of J1- Caroline Hill Road (West)/ Link Road to LG8. Therefore, there may be negative traffic impact to the local road network induced by the proposed Tunnel T3. Please review and revise the wordings in Planning Statement and TIA Report. <u>Traffic Impact Assessment (TIA) Report</u>	Noted. Please be advised that the overall traffic management strategy has been presented in Chapter 2.5 of TIA. The detailed traffic management plan will be further reviewed before commencement of the tunnel connection. Noted and thank you. Noted. Although the right turn traffic at Junction J1 will be increased due to the diverted access route, the overall traffic volume at the road section will not be greater than the scenario without the proposed Tunnel T3. Therefore, the benefit of "reduction of at-grade traffic demand" is considered valid. Nonetheless, the wording in Section 6.2 of Planning Statement and TIA Report has been amended as appropriate.

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	5. LG3 is in connection to both Tunnel T1 and Tunnel T3, it is also the major access for vehicles coming from the west. Based on our observation, the existing ticket gate is quite close to the entrance, and traffic queues could be observed sometimes along Hoi Ping Road. Although smart “no stop” ticket gate has been adopted and the traffic utilising the access at Hoi Ping Road may varies upon completion of the tunnels, please take this opportunity to review the feasibility in shifting the ticket gate bar towards the basement to increase the queuing space. 6. Refer to Table 3.2 and Table 5.1, for J1 – Caroline Hill Road (West)/ Link Road, the right turn traffic from Link Road to LG8 is critical with a short queuing space of around 25m. As such, please provide the queue length assessments for the junction to demonstrate no adverse traffic impact for the increased (diverted) traffic flow induced by Tunnel 3 to LG8 for our considerations. 7. Refer to Drawing No. 4.11 – Please advise why the figures showing the net differences in traffic flows due to Tunnel T3 is not just the addition of Drawing Nos. 3.1 and 3.7. Please review.	Please be advised that the control gate serves as the main access control point for all vehicles entering the basement including the goods vehicles at loading/unloading bays situated at B1/F. Therefore, it is necessary to locate the gate somewhere between G/F and B1/F for access control purposes. Due to layout constraints, shifting the concerned gate further toward the basement would not be feasible, as it would not maintain sufficient turning space for goods vehicles. Nonetheless, the arrangement of loading/unloading activities at Lee Garden Three could be further reviewed and coordinated by the car park operator in order to restrict access by goods vehicles during peak car park traffic hours to alleviate traffic queues. In the event that a traffic queue from Lee Garden Three to Hoi Ping Road forms, the car park operator would deploy staff to guide vehicles to the basement car park via Lee Garden Eight. Since the road improvement work at J1 is ongoing with a significantly changed junction layout and method of control, queue length assessment has only been conducted for the future reference and design scenario. As reviewed, the available queue lengths provided at the junction will be sufficient to cater for the anticipated vehicle queues during peak hours in both the reference and design scenarios of year 2036. The assessment has been provided in the Chapter 5 of TIA. It is clarified that the net differences in traffic flows presented in Drawing No. 4.11 are rounded to the nearest 5 and derived with reference to (i) the directional splits of the ingress and egress traffic of Lee Garden One, Lee Garden Three and Lee Garden Eight as presented in Drawing Nos. 3.7, 3.9 and 4.2 respectively; and (ii) the following anticipated diversions from the reference scenario (with Tunnels T1 & T2) to the design scenario (with Tunnels T1, T2 & T3): • Ingress of Lee Garden One from the south via Lee Garden Eight instead of Lee Garden Two

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		• Egress of Lee Garden One to the south via Lee Garden Eight instead of Lee Garden One • Ingress of Lee Garden Three from the south via Lee Garden Eight instead of Lee Garden Three • Egress of Lee Garden Three to the south via Lee Garden Eight instead of Lee Garden Three • Ingress of Lee Garden Eight from the west via Lee Garden Three instead of Lee Garden Eight For easy reference, Drawing No. 4.11 has been revised, presenting the exact traffic flows instead of rounded figures.
	8. Refer to Section 7.2.2 and Drawing No.7.1, it is advised that 5 nos. MGV/HGV parking spaces and 5 nos. of coach parking spaces would be suspended. Please advise why the MGV/ HGV / coaches parking spaces on B2/F level need to be suspended with the tunnel construction on B3/F and B4/F levels. Please consider to suspending PCs parking spaces on B3/F and B4/F instead of suspending the MGV/ HGV/ coaches parking spaces on B2/F, as MGV/ HGV/ coaches parking spaces are the PVP requirements in the OZP.	Since the headroom on B3/F is designated for private cars only, construction vehicles would not be able to access the works area on B3/F and B4/F. Therefore, working space and a floor opening on B2/F would be required for internal lifting and delivering major plant, equipment (e.g. the tunnelling machine) and materials from B2/F to the works area on B3/F. As per the preliminary review, it would potentially affect 3 nos. coach parking spaces and 1 no. HGV parking space on B2/F, as presented in Drawing No. 7.1. As mentioned in Section 7.2.2, if the MGV/HGV/coaches PVP on B2/F will be affected during construction stage, the ancillary loading bays would be temporarily converted into the spaces for re-provisioning of the affected public parking spaces to maintain the 24-hr provisions for the public needs. The details of temporary relocation will be reviewed in the detailed design stage and submitted for TD's review and approval prior to the construction works.
	9. Besides, if the MGV/HGV/ coaches parking spaces are required to be suspended, please show the exact locations of the suspended MGV/ HGV/ coaches parking spaces during construction stage.	The potentially affected 3 nos. coach parking spaces and 1 no. HGV parking space at B2/F are indicated in Drawing No. 7.1.
	10. As mentioned in Section 7.2.2, it is noted that ancillary loading bays may be temporarily converted into parking spaces to address the parking demands.	The temporary conversion will take into account the size of coach parking spaces (additional 1m in length) and manoeuvring requirements. The details of temporary

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	However, the size of coaches parking spaces should be larger than L/UL bay for MGW/HGV. Please review. 11. Refer to Section 8.1.9, the main objective of Tunnel T3 is to enhance the circulation between the carparks of LG3 and LG8, instead of resolving the traffic issues at Hysan Avenue and Hoi Ping Road. Please review and revise the wordings in the TIA report.	relocation will be reviewed at detailed design stage and submitted for TD's review and approval prior to the construction works. Section 8.1.9 has been revised.