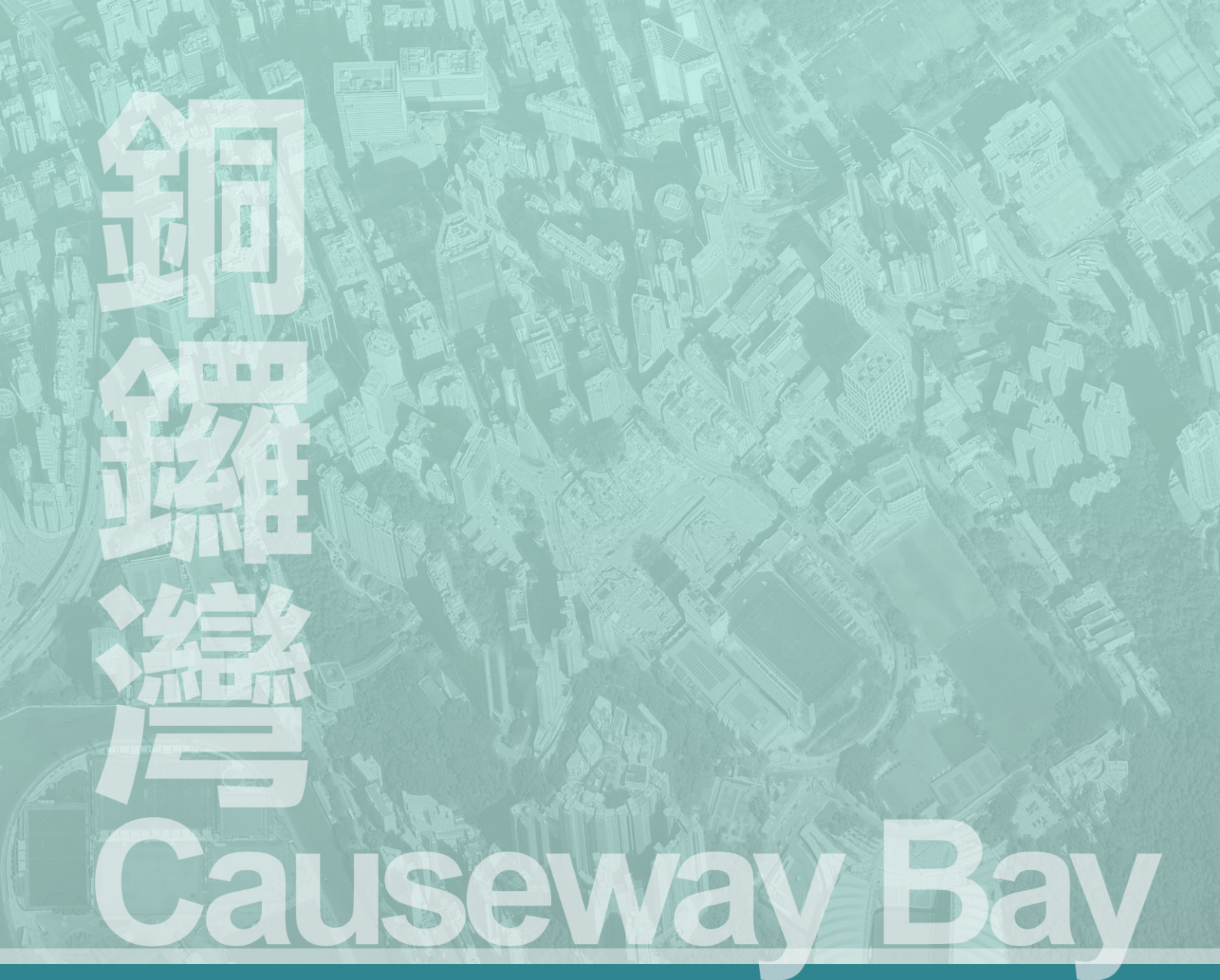


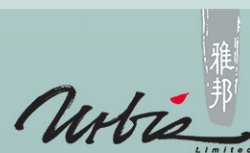


銅鑼灣

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

Planning Statement



July 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

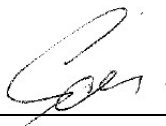
Document No. 001

URBIS Limited

July 2026

In association with
Ronald Lu & Partners (Hong Kong) Ltd.
ARUP
WSP
Otherland Limited
MVA Hong Kong Ltd.
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16 July 2026

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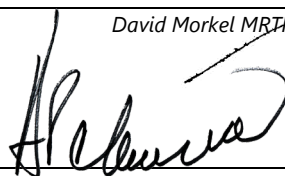


David Morkel MRTPI MHKIP MHKIUD RPP

16 July 2026

Date

Approved for Issue by:



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16 July 2026

Date

Revision Log		
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Rev. 0 Draft	20260130	First Draft Issue
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Executive Summary

This planning application is prepared and submitted under Section 16 of the Town Planning Ordinance (Cap.131) on behalf of Silver Nicety Company Limited and Patchway Holdings (HK) Limited ('the Applicants'), to seek approval from the Town Planning Board (TPB/the Board) for a proposed underground vehicular tunnel ('Tunnel T3') connecting Lee Garden Three and Lee Garden Eight below Leighton Road and Sunning Road in Causeway Bay, Hong Kong Island.

The Project Site, which has an area of approximately 830 m², falls within the Approved Causeway Bay Outline Zoning Plan (OZP) No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21. Most of the Project Site (i.e. approximately 610 m² or 73.5%) falls within an area shown on the respective OZPs as 'Road', and part of it (i.e. approximately 220 m² or 26.5%) falls within areas zoned "Commercial (2)" on the Approved Wong Nai Chung OZP No. S/H7/21.

The Application Site comprises that part of the Project Site (with an area of approximately 610 m²) falling within areas shown as 'Road' on the respective OZPs. In these areas, the proposed Tunnel T3 requires permission from the TPB, according to the Notes of the OZPs (Paras. 7 and 8 of each respective OZP).

Hysan Development Company Limited ('Hysan'), being one of the parent companies of the Applicants, has more than 100 years of curating the physical and social dimensions of the Lee Gardens Area in Causeway Bay. It has established an overall plan, envisioned to enhance the walkability and accessibility of the area through development of a system of covered walkways, pedestrian covered footbridges and underground vehicular tunnels.

The proposed Tunnel T3 connecting Lee Garden Three and Lee Garden Eight forms part of Hysan's overall plan for fostering a well-connected community in the area. As well as providing improved access to parking, the project will address existing traffic conditions and projected traffic demand in future, aiming to enhance the vehicular connectivity and improve the pedestrian environment in Causeway Bay.

This Application establishes that the proposed Tunnel T3 has the following planning merits:

- It complies with material requirements and development parameters of the Approved Causeway Bay Outline OZP No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21;
- It reduces at-grade traffic demand;
- It facilitates efficient utilization of car parking spaces across the surrounding area for optimal use, thereby minimizing vehicle queuing and traffic circulation on public roads;
- It enhances roadside air-quality;
- It preserves the Old and Valuable Tree (OVT) on Leighton Road; and
- It poses no insurmountable adverse impacts in terms of environmental or technical aspects.

The Applicants therefore respectfully request the Town Planning Board, exercising its powers under Section 16 of the Town Planning Ordinance (Cap 131), to approve the proposed Tunnel T3, with or without condition.

內容摘要

(內容如有差異，請以英文版本為準)

本規劃申請由 Silver Nicety Company Limited 和博威控股 (香港) 有限公司 (下稱「申請人」) 代表，根據《城市規劃條例》(第 131 章) 第 16 條規定準備及提交，旨在向城市規劃委員會 (下稱「城規會」) 申請批准在香港島銅鑼灣利園三期與利園八期之間，於禮頓道及新寧道下方興建擬議地下行車隧道。

項目地點面積約 830 平方米，位於銅鑼灣分區計劃大綱圖編號 S/H6/17 及黃泥涌分區計劃大綱圖編號 S/H7/21 範圍內，其中大部分用地 (即約 610 平方米，佔 73.5%) 位於各該分區計劃大綱圖顯示為「道路」的地方內，另一部分用地 (即約 220 平方米，佔 26.5%) 則位於黃泥涌分區計劃大綱圖編號 S/H7/21 的「商業(2)」地帶。

申請地點為該項目地點中約 610 平方米、位於各該分區計劃大綱圖顯示為「道路」範圍的部分。根據各該分區計劃大綱圖的「註釋」(各該分區計劃大綱圖的第 7 及第 8 段)，擬議地下行車隧道需取得城規會的許可。

作為申請人其中一家母公司的希慎興業有限公司 (下稱「希慎」)，在銅鑼灣利園區的建設及社區營造方面擁有超過 100 年的經驗。希慎已制定整體規劃，旨在透過發展有蓋行人通道、行人天橋及地下行車隧道系統，提升該區的步行便利性及可達性。

擬議連接利園三期與利園八期的地下行車隧道，為希慎整體規劃中促進該區社區良好連繫的一部分。除改善泊車設施的便利性外，本項目應對現有交通狀況及未來預計的交通需求，旨在提升銅鑼灣的道路連接及優化行人環境。

本申請證明擬議地下行車隧道具備以下規劃優點：

- 符合銅鑼灣分區計劃大綱圖編號 S/H6/17 及黃泥涌分區計劃大綱圖編號 S/H7/21 的主要要求及發展參數；
- 減少路面交通需求；
- 更有效利用周邊區域的泊車設施，以減少地面車龍及交通流動；
- 改善路邊空氣質素；
- 保留古樹名木；以及
- 在環境或技術方面不會造成無法克服的不良影響。

因此，申請人懇請城規會行使《城市規劃條例》(第 131 章) 第 16 條所賦予的權力，批准擬議地下行車隧道 (可附帶或不附帶條件)。

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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

1 Introduction

1.1 BACKGROUND

- 1.1.1 URBIS Limited is commissioned by Silver Nicety Company Limited and Patchway Holdings (HK) Limited ('the Applicants') to seek approval from the Town Planning Board (TPB) under Section 16 of the Town Planning Ordinance (Cap.131) for a proposed underground vehicular tunnel ('Tunnel T3') connecting Lee Garden Three and Lee Garden Eight below Leighton Road and Sunning Road in Causeway Bay, Hong Kong Island. (**Figure 1.1** refers).
- 1.1.2 Hysan Development Company Limited ('Hysan'), being one of the parent companies of the Applicants, has more than 100 years of curating the physical and social dimensions of the Lee Gardens Area in Causeway Bay. It has established an overall plan, envisioned to enhance the walkability and accessibility of the area through development of a system of covered walkways, pedestrian covered footbridges and underground vehicular tunnels. The proposed Tunnel T3 connecting Lee Garden Three and Lee Garden Eight forms part of Hysan's overall plan for fostering a well-connected community in the area.
- 1.1.3 The purpose of this Planning Statement is to present the indicative development proposal for Tunnel T3 and also relevant technical assessments; and to provide supporting planning justifications, for the consideration of the TPB in the exercise of its powers under Section 16 of the Town Planning Ordinance (Cap.131) .
- 1.1.4 The full tunnel alignment (i.e. the 'Project Site'), has an area of approximately 830 m², and falls within the Approved Causeway Bay Outline Zoning Plan (OZP) No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21. **Figure 1.2** depicts the current OZP zonings of the Site and its environs.
- 1.1.5 Most of the **Project Site** (i.e. approximately 610 m² or 73.5%) falls within an area shown on the respective OZPs as 'Road', and part of it (i.e. approximately 220 m² or 26.5%) falls within areas zoned "Commercial (2)" ("C(2)") on the Approved Wong Nai Chung OZP No. S/H7/21.
- 1.1.6 The **Application Site** is defined by that part of the Project Site having an area of approximately 610 m² and falling within areas shown as 'Road' on the respective OZPs, in which the proposed Tunnel T3 requires permission from the TPB, according to the Notes of the OZPs (Paras. 7 and 8 of each respective OZP).
- 1.1.7 The remaining portion of the Project Site, an area of approximately 220 m² zoned "C(2)" on the Approved Wong Nai Chung OZP No. S/H7/21, is considered an ancillary use to the commercial development within the "C(2)" zone and is always permitted. Therefore, no planning permission from the TPB is required within the area zoned "C(2)". Please refer to details of relevant OZP provisions, parameters and requirements in Section 3 below.

1.2 THE NEED FOR THE PROJECT

- 1.2.1 There is a need for the proposed Tunnel T3 for the following principle reasons:

Existing Traffic Conditions

- 1.2.2 Currently, the Lee Gardens Area, situated at the core of Causeway Bay with a well-developed, high-density mix of commercial and residential developments, experiences heavy at-grade traffic conditions.
- 1.2.3 It has been frequently observed from traffic surveys that the existing green minibus (GMB) termini and the on-street loading/unloading areas on Lan Fong Road are fully occupied during peak hours by GMBs and illegally parked vehicles. Consequently, necessary pick-up/drop-off activities for private cars and taxis have to occur on the carriageway. Together with the movements of GMB traffic in and out of the termini, this has led to traffic queues extending from Lan Fong Road to Yun Ping Road.

- 1.2.4 Meanwhile, it has been observed that illegal parking and prolonged vehicle waiting frequently occupy the nearside lane of Hysan Avenue during peak hours, reducing the effective road capacity. Combined with vehicle conflicts at junctions on the road, traffic queues on Hysan Avenue extend to the junction with Percival Street during critical peak periods.
- 1.2.5 Furthermore, traffic queues have also occasionally been found on Hoi Ping Road, extending from the key access road junction heading to Caroline Hill Road, i.e., the junction of Leighton Road and Caroline Hill Road (West). This further exacerbates traffic issues on Hysan Avenue.
- 1.2.6 In view of the above, it is desirable to explore possible measures to reduce traffic circulation on at-grade roads in order to improve both the traffic and pedestrian conditions in Causeway Bay.

Future Traffic Context

- 1.2.7 Lee Garden Eight, a mixed-use, commercial development located to the south of Leighton Road is currently under construction and is anticipated to be completed by 2026. With a Gross Floor Area (GFA) of 102,000 m², it will comprise offices, retail uses, social welfare facilities, performing arts and cultural facilities, public open spaces, and basement car parks with parking spaces all equipped with EV chargers. It is set to become a new landmark in the Lee Gardens Area.
- 1.2.8 Apart from Lee Garden Eight, other planned developments in the vicinity include the following:
- The planned District Court at Caroline Hill Road with a maximum GFA of 70,000 m² as stipulated on the Approved Wong Nai Chung OZP No. S/H7/21;
 - The proposed commercial redevelopment of the Crowne Plaza Hong Kong Causeway Bay at 8 Leighton Road with a GFA of about 14,945 m² as approved by TPB under Section 16 application no. A/H7/183;
 - The proposed redevelopment of the Po Leung Kuk Headquarters at 66 Leighton Road with an increase of nearly 140 no. service quotas¹; and
 - The proposed new comprehensive sports and recreation centre of the South China Athletic Association at 88 Caroline Hill Road, Wong Nai Chung with a GFA of about 31,327 m² as approved by TPB under Section 16 application no. A/H7/189.
- 1.2.9 Notwithstanding that the proposed road improvement works at Caroline Hill Road, Link Road, Hoi Ping Road, and Leighton Road have been planned and gazetted, in response to the increasing traffic generated by future development projects, Hysan recognizes the need to develop underground vehicular linkages to minimize at-grade traffic flows and achieve a more sustainable environment in the Lee Gardens Area.

Realising the Overall Plan for Enhancing Connectivity in Causeway Bay

- 1.2.10 Hysan has established an overall plan to improve connectivity and walkability at the core areas of Causeway Bay. The overall plan will enhance vehicular and pedestrian connectivity in Causeway Bay as a whole, by reducing at-grade traffic demand and improving the walking environment.
- 1.2.11 Five covered footbridges and a walkway cover were proposed and gazetted under the Roads (Works, Use and Compensation) Ordinance (Cap. 370) in May 2023 (**Figures 1.3a – 1.3b** refer). These will provide seamless weather-proof pedestrian routes from Causeway Bay Mass Transit Railway (MTR) Station to various commercial developments and will divert pedestrians away from the existing network of busy at-grade roads.
- 1.2.12 In addition, two underground vehicular tunnels (i.e. Tunnel T1 and Tunnel T2) connecting Lee Garden

¹ As stated in the Annual Report 2025 – 2026 of Po Leung Kuk
(Source: https://www.poleungkuk.org.hk/f/annual_report/40541/Po%20Leung%20Kuk_AnnualReport_2526.pdf)

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.

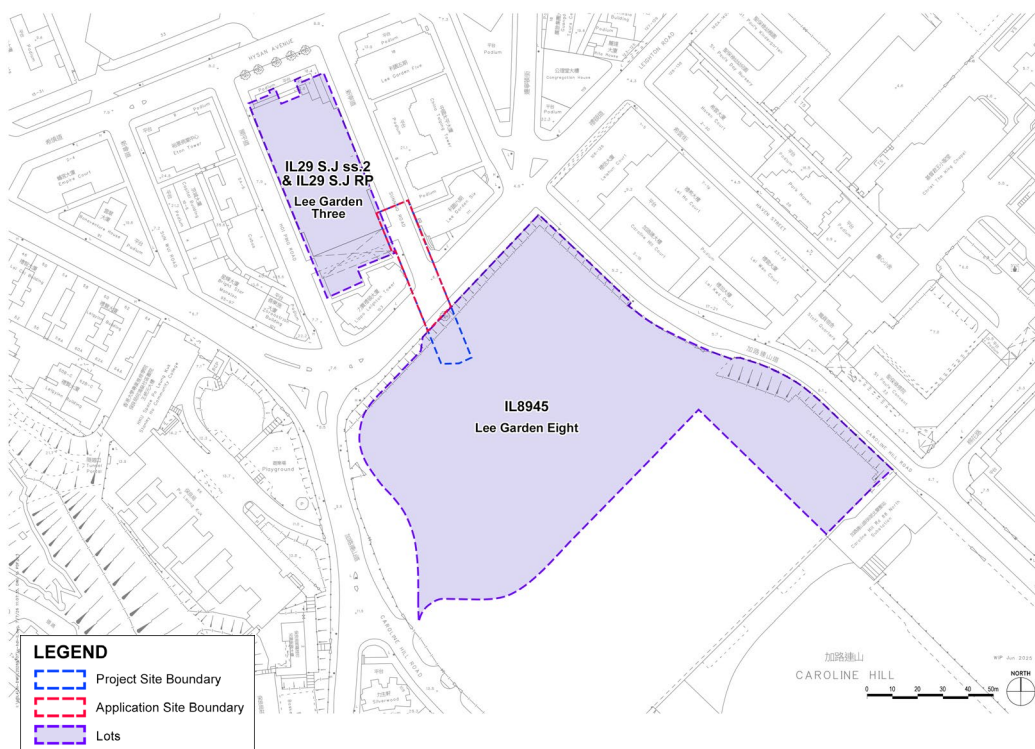


Figure 1.4 - A Plan showing IL29 S.J ss.2 & IL29 S.J RP and IL8945 (Source: GeoInfoMap)

IL29 S.J ss.2 & S.J RP (Lee Garden Three)

- 1.3.2 The Government Lease governing IL29 S.J ss.2 & S.J 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 is currently being

processed.

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)(j), *"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.

2 Site Context and Features

2.1 SITE LOCATION AND EXISTING CONDITION

- 2.1.1 The alignment of the proposed Tunnel T3 will be beneath Leighton Road and Sunning Road, with the southern end connecting to Lee Garden Eight and the northern end connecting to Lee Garden Three (**Figure 1.1** refers).
- 2.1.2 The Project Site of approximately 830 m² includes the Application Site of approximately 610 m² beneath Leighton Road and Sunning Road, whilst the remaining portion of the Project Site lies below Lee Garden Eight, which is currently under construction.

2.2 SURROUNDING DEVELOPMENT AND ENVIRONMENT CONTEXT

Land Use and Development

- 2.2.1 In terms of surrounding land use context, the areas to the north of the proposed Tunnel T3 consist mainly of office/commercial developments (**Figures 2.1 to 2.3** refer). Causeway Bay MTR Station is located within 500m of the Site. Government, Institution or Community (GIC) uses for the Po Leung Kuk, residential developments and schools are located to the west and south across Caroline Hill Road. The South China Athletics Association, the Hong Kong Stadium and other sports clubs/recreational grounds are located to the southeast and east. St. Paul's Hospital and approximately 13-storey high residential uses in Haven Street - zoned "Other Specified Uses" annotated "Mixed Use" - are located to the southeast and east, with some sites undergoing redevelopment/renovation. There are car repair workshops and eating places on the ground floors of developments along the eastern section of Caroline Hill Road near the Haven Street cluster.

Traffic Conditions

- 2.2.2 The proposed Tunnel T3 is located in an area subject to occasional heavy traffic and traffic congestion. Leighton Road is a district distributor serving the southern part of Causeway Bay as a major east-west connection with high traffic volumes at road junctions and several bus stops located along the road. Sunning Road is a one-way local road with southbound traffic connecting Leighton Road and Hysan Avenue.

Old and Valuable Tree (OVT)

- 2.2.3 A large Rubber Tree (*Ficus elastica*) is located above the alignment of Tunnel T3 within Lee Garden Eight and abutting Leighton Road. It sits on a 3.5m-wide existing slope (see **Figure 2.4**). The tree has numerous pillar roots and is some 29m in height and has a spread of approximately 40m. On account of its qualities, it has been recognised by Government as a designated Old and Valuable Tree (OVT (Registration No. LANDSD(LEASED) WCH/1).



Figure 2.4 – Photo of the Old and Valuable Tree

- 2.2.4 It was confirmed during the development of Lee Garden Eight that the OVT is suffering from Brown Root Rot Disease (BRRD), a fungal infection that requires that the tree be monitored and periodically undergo horticultural treatment as necessary.

3 Outline Zoning Plan Provisions, Parameters and Requirements

3.1 PLANNING INTENTION AND USES PERMITTED UNDER THE OZP

- 3.1.1 The entire alignment of the proposed Tunnel T3 (i.e. the 'Project Site'), has an area of approximately 830 m², and falls within the Approved Causeway Bay OZP No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21 (**Figure 1.2** refers).
- 3.1.2 Most of the Project Site (i.e. approximately 610 m² or 73.5%) falls within an area shown on the respective OZPs as 'Road', and this area has been defined as the **Application Site**.
- 3.1.3 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'

- 3.1.4 The Notes of the Approved Causeway Bay Outline OZP No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21 both state:

"(7) The following uses or developments are always permitted on land falling within the boundaries of the Plan except where the uses or developments are specified in Column 2 of the Notes of individual zones:

(a) provision, maintenance or repair of plant nursery, amenity planting, open space, rain shelter, refreshment kiosk, road, bus/tram/public light bus stop or lay-by, cycle track, Mass Transit Railway station entrance, Mass Transit Railway structure below ground level, taxi rank, nullah, public utility pipeline, electricity mast, lamp pole, telephone booth, telecommunications radio base station, automatic teller machine and shrine;

(b) geotechnical works, local public works, road works, sewerage works, drainage works, environmental improvement works, marine related facilities, waterworks (excluding works on service reservoir) and such other public works co-ordinated or implemented by Government; and

(c) maintenance or repair of watercourse and grave.

(8) In any area shown as 'Road', all uses or developments except those specified in paragraph (7) above and those specified below require permission from the Town Planning Board :

toll-plaza, on-street vehicle park, railway track and tram track"

- 3.1.5 It should be noted that an underground vehicular tunnel is not one of the uses specified in Paras. 7 and 8 of the Notes above. Therefore, the proposed project requires planning permission from the TPB under Section 16 of the Town Planning Ordinance (Cap.131) in areas shown as 'Road'.

"C(2)" Zone

- 3.1.6 Under the Schedule of Uses of the Approved Wong Nai Chung OZP No. S/H7/21, the "C(2)" zone is stated to be *"intended 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. These areas are usually major employment nodes"*.
- 3.1.7 The Remarks in the OZP state that *'On land designated "C(2)", for any new development or redevelopment of an existing building, a layout plan shall be submitted for the approval of the Town Planning Board.'*
- 3.1.8 'Underground vehicular tunnel' is not listed as one of the uses always permitted under Column 1 nor

uses that may be permitted under Column 2 of this zone. However, the proposed Tunnel T3, together with the proposed Tunnel T1 and Tunnel T2 previously approved under S.16 applications no. A/H6/93 and no. A/H6/94, form part of an integrated car park network within the commercial development of the Lee Gardens Area and can be regarded as an ancillary use to the commercial development within "C(2)" zone. As stated in Para. 9 of the OZP Notes:

"Unless otherwise specified, all building, engineering and other operations incidental to and all uses directly related and ancillary to the permitted uses and developments within the same zone are always permitted and no separate permission is required."

- 3.1.9 Therefore, the proposed Tunnel T3 is considered an ancillary use to the commercial development within "C(2)" zone and is always permitted. It will not involve any new development or redevelopment of an existing building. Therefore, the proposed project does not require planning permission from the TPB nor submission of layout plan for the approval of the TPB in areas zoned "C(2)".

4 Development Proposal

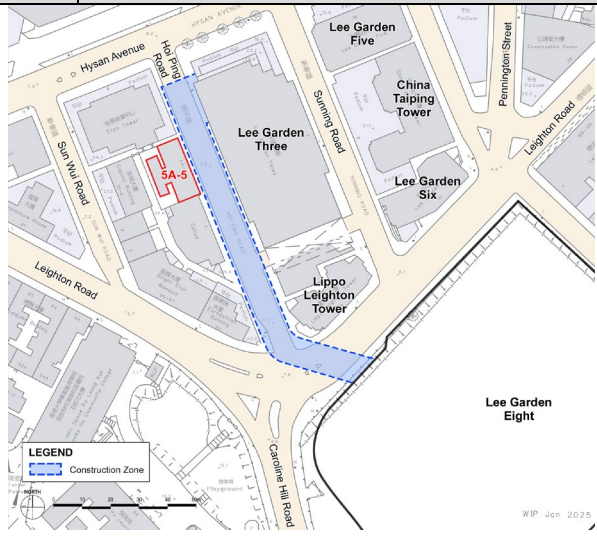
4.1 INTRODUCTION

- 4.1.1 This section of the Planning Statement describes the indicative tunnel development proposal that is the subject of this planning application under Section 16 of the Town Planning Ordinance.

4.2 DESIGN CONSIDERATIONS

- 4.2.1 The proposed project is an underground vehicular tunnel on two levels connecting B3/F and B4/F of the basement car parks at Lee Garden Three (i.e. at -6.25mPD and -9.75mPD respectively) and Lee Garden Eight (i.e. at -8.25mPD and -11.80mPD respectively).
- 4.2.2 As the Site is in close proximity to adjacent private lots and as the adjoining Sunning Road is relatively narrow, it is considered unfeasible to construct a single-level tunnel serving two-way traffic without works encroaching into adjoining private properties on either side of Sunning Road. Therefore, a two-level tunnel is proposed to accommodate two-way traffic between the basement car parks of Lee Garden Three and Lee Garden Eight.
- 4.2.3 The alignment of the proposed tunnel has been developed with due consideration to its technical feasibility and potential impacts on external stakeholders and the general public. As Leighton Road serves as a district distributor, any disruption to road traffic during construction activities would be highly undesirable. To minimize such disturbance and avoid ground-level excavation, the tunnel alignment is proposed to be straight, following the alignment of Sunning Road after crossing Leighton Road, avoiding changes of tunnel direction which would otherwise necessitate underground shafts to be formed from ground level.
- 4.2.4 A detailed analysis of the different design options for the tunnel alignment, which have been considered during the design process is set out below.

Table 4.1: Design Options of Tunnel Alignment

No.	Design Option	Conflict with Existing Buildings	Disturbance to At-grade Road Traffic	Preferred Option
1	Alignment along Hoi Ping Road			
		An existing building at 5A-5 Hoi Ping Road (built in 1958) adjoining the tunnel alignment is supported by on-grade footings, and is highly sensitive to settlement. Hence, this tunnel alignment will cause substantial risk of a significant impact to the existing building and is	Changes of tunnel direction will require underground shafts to be formed from ground level, which will cause disruption to road traffic during construction. Thus, this alignment is not preferred.	X

No.	Design Option	Conflict with Existing Buildings	Disturbance to At-grade Road Traffic	Preferred Option
		considered not feasible.		
2	Alignment along Sunning Road (with changes of tunnel direction)			
		The construction zone at the junction of Sunning Road and Leighton Road will encroach into the adjacent Lippo Leighton Tower and be very close to their pile foundations under this proposed alignment. Hence, it will cause significant risk of impact to the existing foundations and the stability of the adjacent Lippo Leighton Tower and is considered not feasible.	Changes of tunnel direction will require underground shafts to be formed from ground level, which will cause disruption to road traffic during construction. Thus, this alignment is not preferred.	X
3	Alignment along Sunning Road with straight alignment			
		No significant impact on existing buildings are anticipated.	Construction will take place from underground with no underground shaft required to be formed from ground level, and, therefore, no road closure will be involved. See details of construction method in Section 4.4.	✓

4.2.5 In view of the analysis above, the alignment of the proposed tunnel in **Design Option 3** is considered the most feasible with the least potential impacts on external stakeholders and the general public.

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 4.2**.

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	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	Approx. 1: 10
Minimum Clear Headroom	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.

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 4.4a**.

- 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 **Figures 4.4b** and **4.4c** respectively.
- 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.

4.6 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

The map shows a proposed tunnel alignment (red dashed line) running diagonally across the site. The tunnel is labeled "PROPOSED TUNNEL 3". The application site area is highlighted in yellow and labeled "APPLICATION SITE AREA = APPROX. 610 sqm". The project site area is outlined in green and labeled "PROJECT SITE AREA = APPROX. 830 sqm". The tunnel is flanked by black and white checkered patterns. The map also shows surrounding roads: "LEIGHTON ROAD" to the west, "CAROLINE HILL ROAD" to the east, and "LEE GARDEN 3" to the south. The "LIPPO LEIGHTON TOWER" is located to the west of the tunnel. The "CAROLINE HILL ROAD DEVELOPMENT" is located to the east of the tunnel. The "O.V.T." (Overhead Transport) is indicated near the tunnel. The map includes a north arrow and a scale bar.

The diagram illustrates the proposed development for Lee Garden Eight, showing a cross-section of the site. The left side of the diagram shows the existing ground level and the proposed development levels. The right side shows the proposed development levels and the existing ground level. The central part of the diagram shows the proposed development structure, including the proposed tunnels and the existing ground level.

Level (mPD)	Description
+34.60	5
+28.70	4
+23.70	3
+18.70	2
+2.80	B1
-4.35	B2
-8.25	B3
-11.80	B4
-15.35	B5
-18.00	

Tree Protection Zone approx. +7.3mPD (2m below the ground level)

UNEXCAVATED

PROPOSED TUNNEL T3 1:10

UNEXCAVATED

Level (mPD)	Description
+0.75	B1 LOAD
-2.75	B2 CARP
-6.25	B3 CARP
-9.75	B4 CARP
-12.75	UNEXCAVATED

DEVELOPMENT / LEE GARDEN EIGHT

LEIGHTON ROAD

LEE GARDEN THREE

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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:
- Reduction of at-grade traffic on local roads will help to enhance road traffic conditions, 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

and ground water drawdown at adjacent sites, utilities, and buildings will be implemented.

5.5 AIR QUALITY IMPACTS

- 5.5.1 The project team will observe all relevant environmental protection ordinances and requirements and implement pollution control measures to minimise any potential environmental impact/nuisance during the construction stage.
- 5.5.2 The proposed tunnel will be designed with supply and exhaust ventilating fans to ensure sufficient outdoor air is drawn in and polluted air is extracted from the car parks and tunnels.

5.6 NOISE IMPACTS

- 5.6.1 As construction works will take place underground, noise disruption to nearby sensitive receivers will be significantly reduced and is expected to be insignificant.
- 5.6.2 The project team will observe all relevant environmental protection ordinances and requirements and implement noise control measures to minimise any potential environmental impact/nuisance during the construction stage.

5.7 HERITAGE IMPACTS

- 5.7.1 The proposed vehicular tunnel will be constructed entirely underground at approximately -1.35mPD within Lee Garden Eight, which is approximately 7m below the ground level at Leighton Road (approximately +6.10mPD), as shown in the floor plan and section in **Figure 4.3**. The graded structures in the vicinity, including the graded Masonry Walls and Earthenware Pipes at Caroline Hill Road, as well as Main Building of Po Leung Kuk at Leighton Road, are at-grade structures with a horizontal distance of more than 50m from the proposed vehicular tunnel. Given this separation and because all construction works will be carried out entirely underground and no ground-level excavation will take place, the impact on these graded structures is expected to be insignificant.
- 5.7.2 The project team will conduct regular monitoring and inspection of the graded structures to preserve and protect the historic fabric during the construction stage.

5.8 OVERVIEW

- 5.8.1 As stated above, all relevant technical assessments have been undertaken, demonstrating that the proposed project will not generate unmitigable impacts on the surrounding environment.

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 both key road link, 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 at-grade traffic flow and enhance road traffic conditions.
- 6.2.4 Upon completion of Lee Garden Eight and other development projects in the vicinity, higher

concentrations of commercial, retail and other economic activity are anticipated, attracting greater pedestrian flows into Causeway Bay. Enhancement of road traffic conditions will improve the public realm in Causeway Bay and contribute to a safer and more pleasant walking environment for pedestrians.

6.3 FACILITATION OF EFFICIENT UTILISATION OF CAR PARKING SPACES

- 6.3.1 The proposed Tunnel T3, together with the approved Tunnel T1 and Tunnel T2, will link up the basement car parks in Lee Garden One, Lee Garden Two, Lee Garden Three, and Lee Garden Eight, forming an integrated car park network. The higher accessibility of these car parks will facilitate shared use of car parking spaces amongst these commercial developments. With a more efficient use of parking provision where wayfinding for available car parking spaces can take place internally within car parks, the vehicle queuing at car park entrances and traffic circulation on public roads will be minimised.

6.4 ENHANCEMENT IN AIR QUALITY

- 6.4.1 As the proposed Tunnel T3 will reduce at-grade road traffic demand and the traffic queuing time along roads and road junctions, as well as car parks entrances, pollutants emitted from vehicles on the roads will be reduced. The air quality of the area will be improved.

6.5 NO IMPACTS TO THE OVT

- 6.5.1 The proposed Tunnel T3 will be constructed entirely underground at an elevation of approx. -1.35mPD, which is at least 10m below the top of soil of the OVT. In accordance with *DEVB TC(W) No. 5/2020*, the tunnel is located outside the statutory TPZ, and no excavation or works at ground level within the dripline are proposed. Accordingly, direct impacts on the OVT are anticipated to be insignificant with the implementation of precautionary measures, such as tree protection and monitoring measures which are proposed given the tree's OVT status and its existing BRRD condition.

6.6 NO INSURMOUNTABLE TECHNICAL IMPACTS

- 6.6.1 As demonstrated in **Section 5** and in technical assessments at **Annexes A and B**, the current scheme will not create any adverse traffic, tree, geotechnical, air quality, noise, and heritage impacts.
- 6.6.2 As such, the proposed project will not result in any insurmountable environmental or technical impacts.

7 Implementation

7.1 PROGRAMME AND PHASING

- 7.1.1 The construction of the proposed underground vehicular tunnel is anticipated to commence in 2029 (i.e. upon completion of Lee Garden Eight) and to be completed by Q3 2033.

7.2 RESPONSIBILITY FOR CONSTRUCTION AND MANAGEMENT

- 7.2.1 The proposed project will be constructed and maintained at the Applicants' cost.
- 7.2.2 The detailed design of structural features, services, utilities, etc. as well as necessary regulatory and Lease submissions will be made in the future at the appropriate point in time.

8 Conclusion

8.1 SUMMARY

- 8.1.1 This Application presents the proposed Tunnel T3 connecting Lee Garden Three and Lee Garden Eight below Leighton Road and Sunning Road to form an integrated basement car park network within the commercial developments of the Lee Gardens Area.
- 8.1.2 The project will improve access to parking and address existing traffic conditions and the projected traffic demand in future, aiming to enhance vehicular connectivity and improve the pedestrian environment in Causeway Bay.
- 8.1.3 This Application establishes that the proposed Tunnel T3 has the following planning merits:
- It complies with material requirements and development parameters of the Approved Causeway Bay Outline OZP No. S/H6/17 and the Approved Wong Nai Chung OZP No. S/H7/21;
 - It reduces at-grade traffic demand;
 - It facilitates efficient utilization of car parking spaces across the surrounding area for optimal use, thereby minimizing vehicle queuing and traffic circulation on public roads;
 - It enhances roadside air-quality;
 - It preserves the Old and Valuable Tree (OVT) on Leighton Road; and
 - It poses no insurmountable adverse impacts in terms of environmental or technical aspects.
- 8.1.4 The Applicants therefore respectfully requests the Town Planning Board, exercising its powers under Section 16 of the Town Planning Ordinance (Cap 131), to approve the proposed Tunnel T3, with or without condition.