

**Similar Applications for Proposed Underground Vehicular Tunnel
on the Approved Causeway Bay Outline Zoning Plan No. S/H6/17**

Approved Applications

<u>Application No.</u>	<u>Proposed Use(s)/Development(s)</u>	<u>Date of Consideration</u>	<u>Approval Condition(s)</u>
A/H6/78	Proposed Underground Vehicular Tunnel (Connecting Lee Garden One and the Sunning Plaza/Sunning Court Redevelopment)	24.6.2016 (MPC)	(a), (b), (e), (f), (g), (h), (i), (j)
A/H6/78-1	Extension of Time for Commencement of the Approved Underground Vehicular Tunnel (Connecting Lee Garden One and the Sunning Plaza/Sunning Court Redevelopment) under Application No. A/H6/78 for a period of 4 years until 24.6.2024	23.6.2020 (Director of Planning under the delegated authority of the Town Planning Board (the Board))	(a), (b), (e), (f), (g), (h), (i), (j)
A/H6/79	Proposed Underground Vehicular Tunnel (Connecting Lee Garden One and Lee Garden Two)	24.6.2016 (MPC)	(a), (b), (e), (f), (j)
A/H6/79-1	Extension of Time for Commencement of the Approved Underground Vehicular Tunnel (Connecting Lee Garden One and Lee Garden Two) under Application No. A/H6/79 for a period of 4 years until 24.6.2024	23.6.2020 (Director of Planning under the delegated authority of the Board)	(a), (b), (e), (f), (j)
A/H6/93	Proposed Underground Vehicular Tunnel (Connecting Lee Garden One and Lee Garden Three)	14.2.2025 (MPC)	(c), (d), (e), (f), (g), (h), (i)
A/H6/94	Proposed Underground Vehicular Tunnel (Connecting Lee Garden One and Lee Garden Two)	14.2.2025 (MPC)	(c), (d), (e), (f)

Approval Conditions

- (a) No excavation works on public roads for construction of the proposed tunnel is allowed;

- (b) The submission and implementation of a Construction Traffic Management Scheme;
- (c) The submission of a Construction Traffic Management Scheme before commencement of construction works;
- (d) In relation to (c) above, the implementation of the Construction Traffic Management Scheme;
- (e) The provision of ingress/egress of the carparks;
- (f) The submission and implementation of a car parking layout;
- (g) The submission of a tree protection proposal for the Old and Valuable Trees (OVTs) on Hysan Avenue before commencement of construction works;
- (h) The implementation of a tree protection proposal for the OVTs on Hysan Avenue;
- (i) The submission of monthly tree monitoring reports for the OVTs at least 3 months before the commencement of construction works for the proposed tunnel until 12 months after works completion; and
- (j) The provision of fire service installations and water supplies for firefighting.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 260729-165928-21658

提交限期
Deadline for submission: 18/08/2026

提交日期及時間
Date and time of submission: 29/07/2026 16:59:28

有關的規劃申請編號
The application no. to which the comment relates: A/H6/98

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Chan

意見詳情
Details of the Comment :

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 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.

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年08月16日星期日 2:02
收件者: tpbpd/PLAND
主旨: A/H6/98 Lee Garden 3rd Tunnel
類別: Internet Email

A/H6/98

Area below Leighton Road and Sunning Road, between Lee Garden Three (10 Hysan Avenue) and Lee Garden Eight (8 Caroline Hill Road)

Site area: About 610sq.m (Includes Government Land of about 588sq.m)

Zoning: Area shown as 'Road'

Applied development: Underground Vehicular Tunnel (Connecting Lee Garden Three and Lee Garden Eight)

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

Seq 1 3

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年09月23日星期三 0:12
收件者: tpbpd/PLAND
主旨: Re: A/H6/98 Lee Garden 3rd Tunnel

類別: Internet Email

Dear TPB Members,

Response to comments: *"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."*

Ha, Ha, Ha. I have been reporting promotion trucks illegally parked on TST streets for well over a decade. No serious action is taken because I find the same trucks parked at the same locations at the same times every time I pass by. They block drop off areas and force other vehicles to stop in the middle of the street to drop off/pick up goods.

The 'parking valets' are still controlling parking meters.

When I asked a senior officer in traffic why all these CCTVs are not being utilized, this district has one on every pole, the response was that they are not used for traffic enforcement.

This is the typical pass the buck between developers and enforcement agencies trotted out to justify approval of plans.

We are not holding our breath that the recently announced "City Brain" will utilize all the costly equipment to address the issues that really interest the community.

Mary Mulvihill

From: [REDACTED]
To: "tpbpd" <tpbpd@pland.gov.hk>
Sent: Sunday, August 16, 2026 2:02:27 AM
Subject: A/H6/98 Lee Garden 3rd Tunnel

A/H6/98

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Mary Mulvihill

Recommended Advisory Clauses

- (a) to note the comments of the District Lands Officer/Hong Kong East, Lands Department (LandsD) that the proposed Tunnel T3 connects Lee Garden Three (Inland Lot (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. Relevant Special Conditions (SCs) of the Conditions of Inland Lot 8945 should be observed:
- (i) the proposed Tunnel 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 applicants shall observe SC No. (3) of the Conditions regarding the preservation of Masonry Walls and Earthenware Pipes. Comment from Antiquities and Monuments Office (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 applicants 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 conservation of the Masonry Walls and Earthenware Pipes and obtain the written consent of the Director of Lands (“the Director”);
- (ii) it is noted that the proposed Tunnel T3 would potentially affect the existing 11 kilovolts cable and 132 kilovolts cable. The applicants are 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 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 applicants are required to clarify and confirm whether the Proposed T3 would affect the Cables and the Cable Reserve Areas;
- (iii) the applicants 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 the safe operation and structural integrity of the Cables and the Cable Installations or any part or parts thereof;
- (iv) the applicants should, in consultation with Water Supplies Department (WSD), clarify whether the proposed Tunnel T3 would affect the existing Government water mains. Under SC No. (8)(f) of the Conditions, in the event that any diversion of the existing water mains is required by the lot owner and approved by the Government, the diversion works shall be carried out by the Director at the cost of the lot owner who shall pay to the Government on demand a sum or sums equal to the cost or costs thereof, such sum or sums to be determined by the Director whose determination shall be final and binding on the lot owner;

- (v) the proposed Tunnel T3 will pass beneath the dripline of an Old and Valuable Tree now known as LANDSD (LEASED) WCH/1 (“the OVT”) located partly within the Pink Hatched Green Area (“PHGA”) of IL 8945 and partly on the adjoining Government land. The applicants are reminded to observe SC No. (13) of the Conditions concerning preservation of trees. In particular, SC No. (13)(k) of the Conditions stipulates that save with the prior written consent of the Director, no building or structure or support for any building or structure may be erected or constructed on, over, above, under, below or within the PHGA except the works or structures as specified under SC No. (13)(k)(i) to (iv) of the Conditions. If the application is approved by the TPB and to proceed with the Proposed T3, the applicants are required to obtain the prior written approval of the Director in accordance with SC No. (13)(k) of the Conditions;
- (vi) the applicants alleged that direct impacts of the proposed Tunnel T3 on the OVT are anticipated to be insignificant as it 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 Tree Protection Zone. Notwithstanding the above and the precautionary and monitoring measures, it is noted that the OVT suffers from the Brown Root Rot Disease and therefore the impact on the OVT should be carefully assessed;
- (vii) some car parking spaces, 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 applicants are 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.

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. Applications on relevant lease modifications will be subject to such terms and conditions, including payment of premium and fees, as imposed by the LandsD acting in its capacity as the landlord at its discretion. In the event that gazettal is required under the Roads (Works, Use and Compensation) Ordinance (Cap. 370) for the proposed road works, you are required to pay the Government all the relevant costs;

- (b) to note the comments of the Chief Highway Engineer/Hong Kong, Highways Department that the requirements stipulated in the Structure Design Manual for Highways and Railways should not be applicable;
- (c) to note the comments of the Chief Building Surveyor/Hong Kong East & Heritage Section, Buildings Department (BD) that as the proposed tunnel is connected to buildings on private lots and be constructed under streets, exemption under section 31(1) of the Building Ordinance (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. Practice Notes for Authorised Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-38 should be referred.

Detailed checking for compliance with the BO will be made upon building plan submission stage;

- (d) to note that the applicants will conduct regular monitoring and inspection of both the Graded Structure and the Graded Building during the construction stage. The Antiquities and Monuments Office will offer comments on the works arising from the proposed development upon receipt of referrals from the respective departments;
- (e) to note the comments of Chief Estate Surveyor/Development Control, LandsD that the Lot Owner is reminded to submit the method statement prior to the construction of tunnel underneath the dripline of the OVT to LandsD for consideration;
- (f) to note the comments of Head of Greening, Landscape and Tree Management Section, DevB that routine quarterly monitoring should be conducted by an expertise in tree risk assessment and related tree inspection works (with qualifications stipulated in the Tree Protection Proposal at **Appendix Ia** of the Paper). 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;
- (g) to note the comments of the Director of Environmental Protection that the applicant should consider using 'drill and excavation' method for the tunnel excavation, as well as strictly comply with relevant environmental legislation / guidelines during design, construction and operation of the proposed underground vehicular tunnels;
- (h) to note the comments of the Head of Geotechnical Engineering Office, Civil Engineering and Development Department that the proposed tunnels should 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;
- (i) to note the comments of the Chief Engineer/Construction, Water Supplies Department (WSD) that if the construction works would affect the existing fresh water mains, WSD should be consulted. 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;
- (j) to note comments of the Chief Engineer/Hong Kong & Islands, Drainage Services Department (DSD) that 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 Authorised Persons (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 Project Manager 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);

- (k) to note the comments of the Director of Fire Services that detailed fire services requirements will be formulated upon receipt of formal submission of general building plans. The Emergency Vehicular Access (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. If the tunnel is constructed using a Tunnel Boring Machine, Fire Services Department shall be notified at least one year prior to the commencement of construction works to facilitate the formation of an Emergency Pressurized Team; and
- (l) to note the comments of the Director of Electrical and Mechanical Services that 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.