

APPLICATION FOR PERMISSION
UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

APPLICATION NO. A/H6/98

- Applicants** : Silver Nicety Company Limited and Patchway Holdings (HK) Limited, represented by URBIS Limited
- Application Site** : Area below Leighton Road and Sunning Road, between Lee Garden Three (10 Hysan Avenue) and Lee Garden Eight (8 Caroline Hill Road) [*Inland Lot (IL) 29 s.J ss.2 & s.J RP (part), and adjoining Government land (GL)*]
- Site Area** : About 610m² (including about 588m² or 96.4% of GL)
- Lease** : IL 29 s.J ss.2 & s.J RP and IL 29 s.J ss.1 RP
- virtually unrestricted except the standard rate and range clause and non-offensive trade clause
- a Licence permitting the five offensive trades (i.e. Oilman, Tavern Keeper, Victualler, Butcher and Sugar-baker) on the Lots was issued on 2.12.1983
- a Modification Letter was executed on 10.1.2025 for provision of the footbridge connecting Lee Garden Three and Lee Garden Five
- a Modification Letter was executed on 7.5.2026 for Tunnel T1 across Hysan Avenue linking up Lee Garden Three and Lee Garden One
- Plans** : Approved Causeway Bay Outline Zoning Plan No. S/H6/17 and Approved Wong Nai Chung OZP No. S/H7/21 (the OZPs)
- Zoning** : Areas shown as ‘Road’
- Application** : Proposed Underground Vehicular Tunnel (Connecting Lee Garden Three and Lee Garden Eight)

1. The Proposal

- 1.1 The applicants seek planning permission for proposed underground vehicular tunnel connecting the existing basement carpark of Lee Garden Three and the future basement carpark of Lee Garden Eight (Tunnel T3) at the area below Leighton Road and Sunning Road (the Site) (**Plan A-1**). The proposed tunnel linking these commercial developments will integrate these basement carparks and become an integral part of the commercial developments. The Site¹ falls

¹ According to the applicants, the Site forms part of the Project Site of the proposed Tunnel T3 which has an

within an area shown as ‘Road’ on the Causeway Bay OZP and the Wong Nai Chung OZP. According to the Notes of the OZPs, commercial development within an area shown as ‘Road’ requires planning permission from the Town Planning Board (the Board).

- 1.2 According to the applicants, the proposed Tunnel T3 connecting the basement carpark of Lee Garden Three and Lee Garden Eight forms part of Hysan’s overall plan for fostering a well-connected community by enhancing vehicular and pedestrian connectivity² in Causeway Bay. The proposed Tunnel T3 is a two-level underground vehicular tunnel, connecting the south-eastern side of B3/F and B4/F of Lee Garden Three along Sunning Road and across Leighton Road to the northern side of B3/F and B4/F of Lee Garden Eight (**Drawings A-1 to A-2**). Each level of the tunnel has a minimum internal clear width of 5m (including a minimum clear width of 4m for the driveway) that would serve one traffic direction at each level for private car use only. The floor plan and section of the proposed Tunnel T3 submitted by the applicants are at **Drawings A-2 to A-3**³. The major development parameters of the proposed Tunnel T3 are summarised below:

Major Development Parameters	Proposed Scheme (No. A/H6/98)
Application Site Area	610m ²
Length	About 70m
Width [#]	About 12m
Minimum Internal Clear Width [#]	5m (including a minimum clear width of 4m for driveway)
Gradient	About 1:10
Minimum Clear Headroom	2.4m

Notes:

- [#] The remaining 7m is required for the supporting structures and temporary precautionary works for construction.

- 1.3 There are two similar planning applications for proposed underground vehicular tunnels connecting Lee Garden One, Lee Garden Two and Lee Garden Three,

area of approximately 830m² (**Drawing A-1**). The remaining part of the Project Site (outside the Site) falls within the “Commercial (2)” zone on the Wong Nai Chung OZP. According to the Notes of the OZP, commercial development is always permitted within the “C” zone.

- ² To enhance pedestrian connectivity in Causeway Bay, five covered footbridges and a walkway cover were proposed and gazetted under the Roads (Works, Use and Compensation) Ordinance (Cap. 370) in May 2023 (**Plan A-2**). These will provide seamless weather-proof pedestrian routes from Causeway Bay Mass Transit Railway (MTR) Station to various commercial developments in Causeway Bay and will divert pedestrians away from the existing busy at-grade road network. In addition, two underground vehicular tunnels (i.e. Tunnel T1 and Tunnel T2) connecting basement carpark of Lee Garden One, Lee Garden Two and Lee Garden Three have been proposed as part of the overall plan to enhance vehicular connectivity with the aim of making the at-grade level more pedestrian-oriented by reducing vehicular traffic at the street level (**Plan A-2**).
- ³ According to the applicants, six car parking spaces out of 195 car parking spaces provided at Lee Garden Three (about 3%) and five car parking spaces out of 612 car parking spaces provided at Lee Garden Eight (about 0.8%) would be permanently lost after the construction of the proposed tunnel. The applicants advise that the traffic impact of their closure should be negligible as the future parking provision rate of Lee Garden Eight is significantly higher than that of the surrounding developments. Nevertheless, the possible reprovision of these affected spaces will be reviewed further at the detailed design stage.

which were approved with conditions by the Metro Planning Committee (the Committee) of the Board on 14.2.2025 (**Plan A-1**) (details in paragraph 5 below). According to the applicants, construction of the proposed Tunnel T3 will commence upon the completion of Lee Garden Eight. Upon completion of T3 in 2033 tentatively, the future basement carpark in Lee Garden Eight and the existing carparks in Lee Garden One, Lee Garden Two and Lee Garden Three could be integrated. This integration would enhance the accessibility of these basement carparks via these proposed underground vehicular tunnels, which provide multiple entrances across the various commercial developments and would encourage more efficient use of a total of over 1,100 private car parking spaces⁴.

- 1.4 According to the Traffic Impact Assessment (TIA) submitted by the applicants (Annex A of **Appendix Ia**), the proposed Tunnel T3 would enable an alternative ingress route for future traffic to Lee Garden Eight from Percival Street and Leighton Road eastbound via the existing run-in of Lee Garden Three at Hoi Ping Road, avoiding travel through Caroline Hill Road (West) and the two at-grade signalised junctions with Leighton Road and Link Road (**Drawing A-4**). Together with Tunnel T1 between Lee Garden One and Lee Garden Three, the proposed Tunnel T3 would enable alternative ingress and egress of traffic from/to Caroline Hill Road (West) via Lee Garden Eight to/from Lee Garden One and Lee Garden Three, avoiding Leighton Road, Yun Ping Road, Hysan Avenue, Hoi Ping Road, Lan Fong Road and the two at-grade signalised junctions with Leighton Road and Link Road (**Drawings A-5 and A-6**). With the proposed Tunnel T3, alternative ingress and egress points would be available for these basement carparks, allowing flexibility for the carpark operators to manage ingress and egress of vehicles to suit the different traffic conditions in the area. In addition, the proposed tunnels will provide opportunities to implement short-term or temporary traffic management schemes for special events without affecting vehicular access (**Drawing A-7**). 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. According to the applicants, the opening hours of the carpark at Lee Garden Three are currently 24 hours a day, and the opening hours of the carpark at Lee Garden Eight will also be 24 hours a day.

- 1.5 According to the applicants, the proposed Tunnel T3 will be constructed using a “drill and excavation” method, ensuring that there will be no at-grade excavation work on public streets and no road closure involved⁵. The proposed Tunnel T3 will pass below the Old and Valuable Tree within Lee Garden Eight (i.e. LANDSD (LEASED) WCH/1) (OVT) (**Plan A-2**) outside the Site. According

⁴ According to the applicants, upon completion of these tunnels, Lee Garden Eight will provide 607 private car parking spaces, and Lee Garden One, Two and Three will provide 187, 163 and 189 private car parking spaces respectively. The final provision of car parking spaces is subject to further review at detailed design stage.

⁵ According to the applicant, different alignment options were explored with due consideration to their technical feasibility and potential impacts on nearby 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.

to the Tree Protection Proposal submitted by the applicants (Annex B of **Appendix Ia**), 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) (**Drawing A-3**). As the proposed Tunnel T3 will be located outside the Tree Protection Zone⁶ (TPZ) with no excavation or works proposed at ground level within the dripline area and will pass at least 8m below the 2m deep TPZ, direct impacts on the OVT are anticipated to be insignificant with the implementation of precautionary measures (details in paragraph 2(e) below). As advised by the Lands Department (LandsD), the preservation of the OVT is also stipulated in Special Conditions (SC) No. 13 of the Conditions of IL 8945 (Lee Garden Eight)⁷.

1.6 In support of the application, the applicants have submitted the following documents:

- (a) Application Form received on 21.7.2026 (Appendix I)
- (b) Supplementary Planning Statement (SPS) (Appendix Ia)
- (c) Further Information (FI) received on 28.8.2026[#] (Appendix Ib)
- (d) FI received on 18.9.2026* (Appendix Ic)

[#] Accepted but not exempted from the publication and recounting requirement

* Accepted but exempted from the publication and recounting requirement

2. **Justifications from the Applicants**

The justifications put forth by the applicants in support of the application detailed in the SPS and FIs at **Appendices Ia to Ic** are summarised as follows:

- (a) the areas shown as ‘Road’ on the OZPs are designated for road transportation purpose. It is considered that the proposed Tunnel T3 does not deviate from this purpose. Since the proposed tunnel would only involve underground use as an alternative to an at-grade vehicular route, no land use incompatibility with the surrounding developments is anticipated;
- (b) the proposed Tunnel T3 will serve as an alternative underground route, diverting vehicles from grade to underground level. It is estimated that the traffic flows along some key road links, such as Leighton Road, and local roads, including Yun Ping Road, Hoi Ping Road, Sunning Road, Lan Fong Road and Lee Garden Road, as well as at their junctions, will be reduced. Moreover, upon completion of Lee

⁶ In accordance with paragraph 26 of Development Bureau (DevB) 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 TPZ.

⁷ It is stipulated that, save with the prior written consent of the Director of Lands (D of Lands), in general no building or structure or support for any building or structure may be erected or constructed on, over, above, under, below or within the dripline of the OVT. If this application is approved by the Board, the applicants are required to obtain the prior written approval of D of Lands before proceeding with the proposed Tunnel T3.

Garden Eight and other developments in the vicinity, increased commercial, retail and other economic activities are anticipated, which would attract greater pedestrian and vehicular flows in Causeway Bay. In this regard, reducing the overall at-grade traffic volume will improve the public realm and contribute to a safer and more pleasant walking environment for pedestrians;

- (c) the proposed Tunnels T1, T2 and T3 will link up the basement carpark in Lee Garden One, Lee Garden Two, Lee Garden Three, and the future Lee Garden Eight, forming an integrated carpark network. The improved connection between these carparks will facilitate shared use of car parking spaces amongst these commercial developments. Through more efficient use of parking provision and internal wayfinding to available car parking spaces, vehicle queuing at carpark entrances and unnecessary circulation on public roads could be reduced;
- (d) by reducing at-grade road traffic demand and vehicle queuing along the roads, junctions and carparks entrances, vehicular emissions will also be reduced, thus improving local air quality;
- (e) the proposed Tunnel T3 will be constructed entirely underground at -1.35mPD, which is at least 10m below the topsoil of the OVT. As the tunnel is located outside the TPZ and no excavation or works at ground level within the dripline of the OVT is proposed, direct impacts on the OVT are anticipated to be insignificant with the implementation of precautionary measures, such as regular tree monitoring, having regard to its existing Brown Root Rot Disease (BRRD) condition⁸. A qualified tree expert team will be formed and will certify all detailed Method Statement prior to the commencement of any site investigation or construction works; and
- (f) a TIA and a Tree Protection Proposal have been undertaken. The applicants also assess that the proposed Tunnel T3 would not create any adverse geotechnical, air quality, noise, and heritage impacts⁹.

3. Compliance with the “Owner’s Consent/Notification” Requirements

One of the applicants is the sole “current land owner” of the private lots involved. Detailed information will be deposited at the meeting for Members’ inspection. For the GL portion, the Town Planning Board Guidelines on Satisfying the “Owner’s Consent/Notification” Requirements under Section 12A and 16 of the Town Planning Ordinance (TPB PG-No. 31B) is not applicable.

⁸ According to the applicants, the OVT is suffering from BRRD, a fungal infection that requires that the tree be monitored and periodically undergo horticultural treatment as necessary.

⁹ The graded structures in the vicinity, including the graded Masonry Walls and Earthenware Pipes at Caroline Hill Road, as well as the 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 with no need for ground-level excavation, the impact on these graded structures is expected to be insignificant.

4. Previous Application

There is no previous application at the Site.

5. Similar Applications

- 5.1 There are four similar applications for underground vehicular tunnel within the Causeway Bay OZP scheme area. Two of them, related to Tunnel T1 (i.e. Applications No. A/H6/78 and 93), are located in the area below Hysan Avenue between Lee Garden One (33 Hysan Avenue) and Lee Garden Three (10 Hysan Avenue), and the remaining two, related to Tunnel T2 (i.e. Applications No. A/H6/79 and 94), are located in the area below Yun Ping Road between Lee Garden One (33 Hysan Avenue) and Lee Garden Two (2-38 Yun Ping Road) (**Plan A-1**).
- 5.2 Applications No. A/H6/78 and 79 were approved by the Committee of the Board with conditions on 24.6.2016 mainly on the considerations that the proposed underground tunnels would not compromise the 'Road' function of Hysan Avenue and Yun Ping Road; the proposed tunnels would provide alternative route choices for vehicles to access and leave the carpark of the commercial buildings, thereby helping to segregate traffic along the busy section of Lan Fong Road; there would be no land use incompatibility; the proposal would not cause any adverse visual impact on the public realm; and concerned government departments had no adverse comments on the applications. Due to the lapsing of the two planning permissions¹⁰, the same applicants then submitted Applications No. A/H6/93 and 94 for Tunnels T1 and T2 respectively, with slight changes in major development parameters and connection level. These applications were approved by the Committee of the Board with conditions on 14.2.2025 mainly on similar considerations. Details of the previous applications are summarised in **Appendix II**.

6. The Site and It Surrounding Areas (Plans A-1 to A-5)

- 6.1 The Site is:
- (a) located between Lee Garden Three and Lee Garden Eight under a section of Sunning Road, which is a one-lane one-way local road (8m wide); and a section of Leighton Road, which is a four-lane two-way district distributor; and
 - (b) bounded by the existing basement carpark of Lee Garden Three to the northwest and the future basement carpark of Lee Garden Eight to the south.
- 6.2 The surrounding areas have the following characteristics:

¹⁰ Since the validity of the permissions of both applications expired on 24.6.2016, the applicants subsequently applied for Extension of Time for an additional period of 4 years each, extending them to 24.6.2024 under application No. A/H6/78-1 and 79-1, which were approved by the Director of Planning under delegated authority of the Board on 23.6.2020.

- (a) the surrounding area is primarily occupied by a mix of commercial and composite buildings, as well as government, institution or community (GIC) facilities;
- (b) commercial buildings are located along Sunning Road (including Lee Garden Three, Lippo Leighton Tower, Lee Garden Five, China Taiping Tower and Lee Garden Six) and Caroline Hill Road development (which includes Lee Garden Eight and GIC facilities) adjacent to Leighton Road; and
- (c) the area is a popular commercial area and is easily accessible by public transport including buses, mini-buses and mass transit.

7. Planning Intention

The area shown as 'Road' is reserved for road purpose.

8. Comments from Relevant Government Bureau and Departments

- 8.1 The following government departments have been consulted and their views on the application and the public comments received are summarised as follows:

Land Administration

- 8.1.1 Comments of the District Land Officer/Hong Kong East, Lands Department (DLO/HKE, LandsD):

- (a) the proposed Tunnel T3 will connect Lee Garden Three (IL 29 SJ ss.2 & s.J RP and IL 29 SJ ss.1 RP, "the Lots of Lee Garden Three") and Lee Garden Eight (IL 8945) via the unleased and unallocated GL underneath Leighton Road and Sunning Road;
- (b) the proposed Tunnel T3 will pass beneath the dripline of the OVT (which is located partly within IL 8945 and partly on the adjoining GL) and the existing Masonry Wall and Earthenware Pipes. It is noted that the OVT suffers from BRRD, and therefore the impact on the OVT should be carefully assessed;
- (c) if the planning application is approved by the Board, a lease modification and/or other appropriate land documentation in respect of the affected lots will be required to take forward the proposal. However, there is no guarantee that such application(s) will be approved;
- (d) in the event that gazettal is required under the Roads (Works, Use and Compensation) Ordinance (Cap. 370) for the proposed road works, the applicants shall be liable to pay the Government all relevant costs including compensation; and

- (e) other comments in relation to the Special Conditions of the Conditions of IL 8945 are at **Appendix IV**.

Traffic

8.1.2 Comments of the Commissioner for Transport (C for T):

- (a) no objection to the application from traffic engineering perspective; and
- (b) should the application be approved by the Board, the following approval conditions shall be included:-
 - (i) the submission and implementation of a Traffic Management Plan for the carparks connected by the proposed Tunnel T3 to demonstrate the operation of proposed internal traffic and transport arrangement for vehicles and pedestrians to the satisfaction of the C for T or of the Board;
 - (ii) the submission and implementation of a Construction Traffic Management Scheme to the satisfaction of the C for T or of the Board;
 - (iii) the provision of ingress/egress of the carparks to the satisfaction of C for T or of the Board; and
 - (iv) the submission and implementation of a car parking layout for the carparks connected by the proposed Tunnel T3, including the review of the location and layout of the access control gates, to the satisfaction of C for T or of the Board.

Landscape

8.1.3 Comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD):

- (a) no adverse comments on the application from a landscape planning perspective;
- (b) based on the aerial photo taken in March 2025, the Site is situated in an area of Medium/ High-rise Commercial Urban landscape character surrounded by existing GIC developments, commercial buildings and roads. The proposed underground vehicular tunnel is not incompatible with the landscape setting in the vicinity;
- (c) the proposed underground tunnel will pass beneath the dripline of the OVT with Registration No. LANDSD(LEASED) WCH/1 at approximately -1.35mPD which is at least 10m below the existing ground level of the OVT. According to the Application Form

(**Appendix I**), no tree felling will be involved. The distinctive landscape resources i.e. the OVT would not be affected; and

- (d) in view of the above, significant adverse landscape impact arising from proposed use is not anticipated.

Tree Preservation

8.1.4 Comments of the Head of Greening, Landscape and Tree Management Section, DevB (H(GLTMS), DevB):

- (a) 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 expert in tree risk assessment and related tree inspection works, with qualifications stipulated in section 3.6 of the Tree Protection Proposal at **Appendix Ia**); and
- (b) given the applicants agree to provide a further method statement, incorporating the advice of the Independent Tree Expert, prior to the commencement of any construction works, she has no further comment on the application.

8.1.5 Comments of the Chief Estate Surveyor/Development Control, LandsD (CES/DC, LandsD):

- (a) the applicants 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 the tunnel underneath the dripline of the OVT to LandsD for consideration; and
- (b) no objection to approve the proposed Tunnel T3 subject to the following conditions:
 - (i) the submission of a tree protection proposal for the OVT on Leighton Road, incorporating the advice of the Independent Tree Expert, before the commencement of construction works to the satisfaction of the Director of Lands (D of Lands) or of the Board; and
 - (ii) the implementation of the tree protection proposal for the OVT on Leighton Road to the satisfaction of the D of Lands or of Board.

Environment

8.1.6 Comments of the Director of Environmental Protection (DEP):

- (a) no objection to the application;

- (b) the applicants are advised to consider using the ‘drill and excavation’ method for the tunnel excavation; and
- (c) the applicants are reminded to strictly comply with relevant environmental legislation and guidelines during the design, construction and operation of the proposed underground vehicular tunnels.

Geotechnical

8.1.7 Comments of the Head of Geotechnical Engineering Office, Civil Engineering and Development Department (H(GEO), CEDD):

- (a) no adverse geotechnical comments on the application; and
- (b) the applicants are reminded that the proposed tunnel shall be designed and constructed to the relevant geotechnical standards and guidelines. The construction of the proposed vehicular tunnel shall not impair the safety of or cause damage to any adjacent buildings, structures, land, streets or services.

Building Matters

8.1.8 Comments of the Chief Building Surveyor/Hong Kong East and Heritage, Buildings Department (CBS/HKE&H, BD):

- (a) no objection to the application;
- (b) the proposed tunnel is for vehicular traffic. In general, if the proposed tunnel is to be erected on GL, it is not accountable for gross floor area (GFA) calculation under the Buildings Ordinance (BO);
- (c) as the proposed tunnel is connected to buildings on private lots and is to be constructed under streets, exemption under section 31(1) of the BO to permit such a structure to project over or under streets will be required. Exemption under section 31(1) of the BO may be given provided that, among others, commercial activities are generally not allowed unless they are accompanied by planning permission and have specific justified public benefit acceptable to relevant government departments, and are accountable for GFA calculation under OZP. Practice Note for Authorized Persons, Registered Structural Engineers and Registered Geotechnical Engineers (PNAP) APP-38 refers; and
- (d) detailed checking for compliance with the BO will be made upon building plans submission stage.

Water Supply

8.1.9 Comments of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD):

- (a) no objection to the application; and
- (b) there are some existing fresh water mains within the Site and it is noted that the level of the tunnel is lower than the water mains. However, if the construction works will affect the existing fresh water mains, WSD shall 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 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 costs should be borne by the project proponent.

Fire Safety

8.1.10 Comments of the Director of Fire Services (D of FS):

- (a) detailed fire services requirements will be formulated upon receipt of a formal submission of general building plans;
- (b) 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 works affect any EVA provision of nearby buildings, the consultant should make a separate enquiry to this department to ensure the feasibility of the works; and
- (c) other comments are at **Appendix IV**.

District Officer's Comments

8.1.11 Comments from the District Officer (Wan Chai):

Her office has not received any comments from members of the public.

8.2 The following bureau/departments have no adverse comment on/ no objection to the application:

- (a) Antiquities and Monuments Office (AMO);
- (b) Commissioner for Police (C of P);
- (c) Director of Electrical and Mechanical Services (DEMS);

- (d) Chief Highway/Hong Kong, Highways Department (CHE/HK, HyD); and
- (e) Chief Engineer/Hong Kong & Islands, Drainage Services Department (CE/HK&I, DSD).

9. Public Comments Received During Statutory Publication Periods

During the statutory publication periods, three adverse public comments were received from individuals (**Appendix III**). The major grounds for the reservations/objections are that the applicants have failed to demonstrate that the proposed tunnel would not cause potential indirect impacts on the OVT through underground excavation, settlement, changes in the groundwater regime or vibration, and that such a demonstration should be verified by an independent tree expert; the applicants have also failed to demonstrate that the proposed tunnel would not impose an additional burden on the drainage capacity of the ground beneath the streets; and the proposed tunnel cannot improve the existing at-grade traffic conditions in Causeway Bay.

10. Planning Considerations and Assessments

- 10.1 The application is for an underground vehicular tunnel (Tunnel T3) connecting the existing basement carpark of Lee Garden Three and the future basement carpark of Lee Garden Eight at the area beneath Leighton Road and Sunning Road, which will integrate these basement carparks and become an integral part of the commercial developments (**Plans A-1 and A-2**). The Site falls within an area shown as 'Road' on the Causeway Bay OZP and the Wong Nai Chung OZP, and planning permission from the Board is required for commercial development within an area shown as 'Road'.
- 10.2 According to the applicants, the proposed Tunnel T3 will form part of Hysan's overall plan for fostering a well-connected community in Causeway Bay. There are two similar approved planning applications for proposed underground vehicular tunnels connecting Lee Garden One, Lee Garden Two and Lee Garden Three in the vicinity (as detailed in paragraph 5 above). According to the applicants, upon completion of Tunnels T1, T2 and T3, the proposed basement carpark in the future Lee Garden Eight and the existing carparks in Lee Garden One, Lee Garden Two and Lee Garden Three could be integrated. The applicants consider that such integration would enhance the accessibility of these basement carparks by providing alternative route choices and multiple entrances for vehicles to access and leave the basement carparks across the various commercial developments, which would encourage more efficient utilisation of car parking spaces, segregate through traffic along busy road sections in Causeway Bay, and improve air quality and pedestrian safety in the area. In addition, as the proposed Tunnel T3 is entirely underground, no land use incompatibility nor visual impact on the public realm is anticipated.
- 10.3 Similar to the previously approved schemes for Tunnel T1 and T2, the same "drill and excavation" construction method would be adopted so as to avoid any at-grade excavation works on public streets or any road closure. While there would be a temporary suspension of car parking spaces in Lee Garden Three during the construction period, most of the affected spaces will be reinstated upon completion

of the works, except for six spaces in Lee Garden Three and five spaces in Lee Garden Eight. Moreover, the construction of Tunnel T3 is planned to commence only after the completion of Tunnels T1 and T2 and upon full provision of private car parking spaces of Lee Garden Eight, which would provide about 607 car parking spaces. According to the TIA, as a traffic management strategy, appropriate directional signage will be provided in the connected car parks and entrances of the tunnels to clearly guide drivers on the routes to the other connected car parks as well as the exits via shorter and more direct alternative routes as enabled by the tunnels. Operational traffic impact assessments have also been conducted, and the results demonstrated that Tunnel T3 would not cause negative traffic impact to the local road network, and all the assessed junctions would operate within capacity during peak hours. C for T has no objection to the application, provided that the applicants implement the traffic management measures proposed in the Traffic Impact Assessment. Relevant approval conditions are recommended in paragraph 11.2 (a) to (d) below to address the possible traffic impacts during the construction and operational stages.

- 10.4 Regarding the impact on the OVT at Leighton Road above the proposed Tunnel T3, the applicants state that the proposed Tunnel T3 will be constructed using a “drill and excavation” method, ensuring that there will be no at-grade excavation work, and the permanent structure of the proposed Tunnel T3 will be constructed entirely underground. According to the Tree Protection Proposal submitted by the applicants, 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 will pass at least 8m below the 2m deep TPZ of the OVT. The applicants propose various precautionary tree protection and monitoring measures, taking into account the OVT status and its existing BRRD condition in the submitted Tree Protection Proposal. The applicants also committed to forming a qualified tree expert team to certify all detailed method statements prior to the commencement of any site investigation or construction works. CES/DC, LandsD and H(GLTMS) of DevB have no objection to the application. H(GLTMS) of DEVB recommends that, for tree protection and public safety, the applicants should closely monitor the tree health and stability by an independent tree expert. As mentioned above, the preservation of the OVT is stipulated in the Conditions of IL 8945 (Lee Garden Eight). Approval conditions regarding tree protection are also recommended in paragraph 11.2 (e) to (f) below.
- 10.5 Other relevant government departments, including CHE/HK of HyD, CBS/HKE&H of BD, C for Heritage of DevB, CTP/UD&L of PlanD, DEP, H(GEO) of CEDD have no adverse comment on or objection to the application.
- 10.6 Regarding the adverse public comments detailed in paragraph 9, the planning considerations and assessments in paragraphs 10.1 to 10.5 above, as well as the departmental comments in paragraph 8 above are relevant.

11. Planning Department's Views

- 11.1 Based on the assessments made in paragraph 10 and having taken into account the public comments mentioned in paragraph 9 above, the Planning Department has no objection to the applications.

- 11.2 Should the Committee decide to approve the applications, it is suggested that the permissions shall be valid until **23.10.2030**, and after the said date, the permissions shall cease to have effect unless before the said date, the developments permitted are commenced or the permissions are renewed. The following conditions of approval and advisory clauses are suggested for Members' reference:

Approval Conditions

- (a) the submission and implementation of a Traffic Management Plan for the carparks connected by the proposed Tunnel T3 to demonstrate the operation of proposed internal traffic and transport arrangement for vehicles and pedestrians to the satisfaction of the Commissioner for Transport (C for T) or of the Town Planning Board (the Board);
- (b) the submission and implementation of a Construction Traffic Management Scheme to the satisfaction of the C for T or of the Board;
- (c) the provision of ingress/egress of the carparks to the satisfaction of C for T or of the Board;
- (d) the submission and implementation of a car parking layout for the carparks connected by the proposed Tunnel T3, including the review of the location and layout of the access control gates, to the satisfaction of C for T or of the Board;
- (e) the submission of a tree protection proposal for the Old and Valuable Tree (OVT) on Leighton Road before commencement of construction works to the satisfaction of the Director of Lands (D of Lands) or of the Board; and
- (f) the implementation of a tree protection proposal for the OVT on Leighton Road to the satisfaction of the D of Lands or of the Board.

Advisory Clauses

The recommended advisory clauses are attached at **Appendix IV**.

- 11.3 Alternatively, should the Committee decide to reject the application, the following reason for rejection is suggested for Members' reference:

the applicants fail to demonstrate that the proposed development will not cause insurmountable impact on the Old and Valuable Tree.

12. Decision Sought

- 12.1 The Committee is invited to consider the applications and decide whether to grant or refuse to grant permissions.

- 12.2 Should the Committee decide to approve the applications, Members are invited to consider the approval condition(s) and advisory clause(s), if any, to be attached to the permissions, and the date when the validity of the permissions should expire.
- 12.3 Alternatively, should the Committee decide to reject the applications, Members are invited to advise what reason(s) for rejection should be given to the applicants.

13. Attachments

Appendix I	Application Form received on 21.7.2026
Appendix Ia	SPS
Appendix Ib	FI submitted on 28.8.2026
Appendix Ic	FI submitted on 18.9.2026
Appendix II	Similar Applications
Appendix III	Public Comments
Appendix IV	Recommended Advisory Clauses
Drawing A-1	Location Plan
Drawing A-2	Floor Plan
Drawing A-3	Section Plan
Drawings A-4 to A-6	Anticipated Traffic Re-routing Submitted by the Applicants
Drawing A-7	Overall Traffic Management Strategy Submitted by the Applicants
Plan A-1	Location Plan
Plan A-2	Site Plan
Plans A-3 to A-5	Site Photos

**PLANNING DEPARTMENT
OCTOBER 2026**