

**Commission of Inquiry into the Construction Works at and near the Hung Hom  
Station Extension under the Shatin to Central Link Project**

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**THIRD WITNESS STATEMENT OF MAN SZE HO**

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I, MAN SZE HO, of [REDACTED] say as follows:

1. I refer to my first and second witness statements dated 26 September 2018 and 18 October 2018 (“**Previous Witness Statements**”). Unless otherwise stated or the context otherwise requires, any abbreviations shall bear the same meaning as in my Previous Witness Statements.
2. I make this third witness statement in connection with the presentation slides for Oral Synopsis delivered by Mr Nick Southward (Independent structural engineering expert engaged by Leighton) before the Commission of Inquiry on 2 January 2020 [*ER2/item 14.9*] (“**Mr Southward’s Slides**”) and the matters arising out of the hearing before the Commission of Inquiry on 3 January 2020.
3. Unless otherwise stated, the facts stated herein are within my personal knowledge and are true. Where the facts and matters stated herein are not within my own knowledge, they are based on the stated sources and are true to the best of my knowledge, information and belief.

**Identification of locations for photos in Mr Southward’s Slides**

4. Photos were included in Mr Southward’s Slides showing the presence of shear links. The locations for those photos can be identified on the basis of the elements/features of the photos as set out in the table below. I have also marked up on: -
  - 4.1. the extracted pages of Mr Southward’s slides;

- 4.2. the HUH Site Layout Plan at EWL Level [C7/5222] (the “**HUH Site Layout Plan**”);
- 4.3. the General Arrangement Plan EWL Track Level (Sheet E38) (the “**General Arrangement Plan for Area C3**”);
- 4.4. a zoomed photo for HZ04 (“**Zoomed Photo for HZ04**”);
- 4.5. additional photos for HZ09 (“**Additional Photos for HZ09**”);
- 4.6. the Drainage Services Layout Plan (Sheet 38) (the “**Drainage Layout Plan for Area C3**”); and
- 4.7. the General Arrangement Plan NSL Track Level (Sheet A31) (the “**General Arrangement Plan for SAT**”),

which are now produced alongside the Layout Plan of Shear Link Investigation at EWL Slab Soffit showing the locations for shear link investigation with reference to Gridlines (extracted from *Appendix JLI-E*); they are all marked Exhibit “**MSH-1**”.

Page no. of Mr Southward's Slides	Locations of shear links	Elements/features for identification of locations
22	HZ01 (between Gridlines 23 and 24)	<p>The photo shows the early-underpinning frame in Area B and the column with “C1” tag.</p> <p>From the HUH Site Layout Plan, it can be shown that the photo was taken at the EWL track slab C1-5 (corresponding to Gridlines 22 to 24).</p>

Page no. of Mr Southward's Slides	Locations of shear links	Elements/features for identification of locations
23	HZ05 (between Gridlines 36 and 37)	The photo was taken on 28 October 2015 according to the metadata, and there is the "C2" tag at the handrail, showing that it was taken at the EWL track slab C2-4, which had the concrete casting on 29 October 2015 (corresponding to Gridlines 34 to 37).
24	HZ08 and HZ10 (between Gridlines 43 and 44)	<p>The photo shows the underpinning frame for mid-level walkway and the 6 and 3 nos. of cast-in PVC pipe.</p> <p>An additional photo from page 26 of Mr Southward's Slides, which was marked for HZ09 but should be HZ10, shows 6 nos. of cast-in PVC pipe.</p> <p>From the General Arrangement Plan for Area C3 and the HUH Site Layout Plan, it can be shown that the photos were taken at the EWL track slab C3-2 and C3-3 (corresponding to Gridlines 42 to 45).</p>
25	Areas B and C slabs	The photos show generally the shear link fixing for the 3-metre EWL track slab, which locates in Areas B and C.

Page no. of Mr Southward's Slides	Locations of shear links	Elements/features for identification of locations
26	HZ02 (between Gridlines 27 and 28)	<p>The photo shows the existing double circular columns.</p> <p>From the HUH Site Layout Plan, it can be shown that the photo was taken at the EWL track slab C1-2 (corresponding to Gridlines 27.5 to 29).</p>
	HZ03 (between Gridlines 29 and 30)	<p>The photo was taken on 28 July 2015 according to the metadata, and it shows the installation of holding down bolts for underpinning works.</p> <p>From the HUH Site Layout Plan, it can be shown that the photo was taken at the EWL track slab C1-1, which had the concrete casting on 28 July 2015 (corresponding to Gridlines 29 to 30).</p>
	HZ04 (between Gridlines 31 and 32)	<p>The photo was taken on 21 November 2015 according to the metadata, and it shows the existing column with GL32 marking (see the Zoomed Photo for HZ04).</p> <p>From the HUH Site Layout Plan, it can be shown that the photo was taken at the EWL track slab C2-1 (corresponding to Gridlines 31 to 32.5).</p>

Page no. of Mr Southward's Slides	Locations of shear links	Elements/features for identification of locations
	HZ09 (between Gridlines 47 and 48)	<p>(The photo marked for HZ09 in Mr Southward's Slides should be for HZ10 - see above.)</p> <p>The Additional Photos for HZ09 show the 100mm diameter FD pipe cast in EWL slab and 6 nos. of 100mm diameter PVC pipe next to a column.</p> <p>From the Drainage Layout Plan for Area C3 and the HUH Site Layout Plan, it can be shown that the photos were taken at the EWL track slab C3-5 (corresponding to Gridlines 47 to 48).</p>
	Should be HZ12 (between Gridlines 4 and 5), although marked for HZ11	<p>This photo was taken on 26 May 2015 and shows a R.C. wall structure aligning with D-wall corner.</p> <p>From the HUH Site Layout Plan, it can be shown that the R.C. wall structure is wall W2b, and that the photo was taken at the EWL slab Bay 2 in Area A which had the concrete casting on 26 May 2015 (corresponding to Gridlines 3 to 4.5).</p>

Page no. of Mr Southward's Slides	Locations of shear links	Elements/features for identification of locations
	HZ18 (between Gridlines 32 and 33)	The photo shows the existing structure in Gridline J 32 above WH82-84.  For the HUH Site Layout Plan, it can be shown that the photo was taken at the EWL track slab C2-1 (corresponding to Gridlines 31 to 32.5).
47	NSL slab of SAT	The photos show the ramps and the layer of ELS strut at the NSL track slab of SAT (see the General Arrangement Plan for SAT); the labour from China Tech, which is the subcontractor for concreting in the SAT, was also shown.
48	SAT area	The photos, taken in the same occasion, show the Lagging Wall in the SAT area, the ELS strut and the labour from China Tech which is the subcontractor for concreting in the SAT.

Dated the 4<sup>th</sup> day of January 2020.

Signed:  .....

**Man Sze Ho**