

## **9. CULTURAL HERITAGE ISSUES**

### **9.1 Introduction**

This Chapter presents an evaluation of the cultural heritage of the Study Area and assesses the potential impacts of the widening works on those identified sites of cultural heritage interest.

### **9.2 Legislation and Applicable Standards**

#### **9.2.1 Environmental Impact Assessment Ordinance**

The EIA Ordinance stipulates that consideration must be given to issues associated with cultural heritage and archaeology as part of the EIA process. Annexes 10 and 19 of the EIA TM outline criteria for evaluating the impacts on sites of cultural heritage and guidelines for impact assessment, respectively. The EIA TM identifies a general presumption in favour of the protection and conservation of all sites of cultural heritage and requires impacts upon sites of cultural heritage to be 'kept to a minimum'. There is no quantitative standard for determining the relative importance of sites of cultural heritage, but in general sites of unique, archaeological, historical or architectural should be considered as highly significant.

#### **9.2.2 Antiquities and Monuments Ordinance**

The principal legislation relevant to cultural heritage and archaeological issues is the Antiquities and Monuments Ordinance (Cap 53). Human artifacts, relics and built structures may be gazetted and protected as monuments under the Antiquities and Monuments Ordinance (Cap 53). Under the Ordinance, the Antiquities Authority (Secretary for Home Affairs) may, after consultation with the Antiquities Advisory Board (AAB) and with Government approval, declare any place, building, site or structure which the Antiquities Authority considers to be of public interest by reason of its historical, archaeological or palaeontological significance, to be a monument, historical building, archaeological or palaeontological site or structure. Once declared to be a site of public interest, no person may undertake acts which are prohibited under the Ordinance, such as to demolish or carry out building or other works, unless a permit is obtained from the Antiquities Authority.

The Antiquities and Monuments Office (AMO) of the Leisure and Cultural Services Department is part of the Government Secretariat and comprises the executive arm of the Antiquities Authority. The AMO is the services arm of the AAB and is responsible for advising the Government on sites which merit protection. The AMO has further responsibility for the protection of buildings, items of historical interest and areas of archaeological significance. The excavation and search for such relics requires a licence under the Ordinance.

For archaeological sites, all relics dated prior to 1800AD belong to the Hong Kong Government under the Antiquities and Monuments Ordinance. Once identified as having the potential for conservation, archaeological sites are entered into the record. Archaeological sites are administratively classified by AAB into three categories, as follows:

- Designated - those that have been declared as monuments and are to be protected and conserved at all costs;

- Administrative Protection - those which are considered to be of significant value but which are not declared as monuments and should be either protected, or if found not possible to protect these sites then salvaged; and
- Monitored - those which are of lesser significance or whose potential is not fully assessed which should not be disturbed with the exception of minor works if they are permitted and monitored by AMO.

### 9.2.3 Archaeological Organisations

In addition to the AMO, the Hong Kong Archaeological Society (HKAS) is an independent organisation with experts and members of the public who have an interest in archaeological matters. The HKAS organises meetings, site visits and excavations of local sites and publishes archaeological journals.

## 9.3 Study Methodology

The investigation of the cultural heritage of the area follows the approach identified in the EIA TM and the guidelines established by the AMO as set out in the EIA Study Brief. There is relatively little published information on the cultural heritage of the Study Area. Therefore, in addition to the desk top study, a field evaluation was carried out along the alignment. This approach minimised the likelihood of any features of cultural heritage interest being overlooked. This cultural heritage investigation has been carried out with reference to the following:

- review of available documented information;
- review of the current Outline Zoning Plans, historical maps and aerial photographs; and
- site visits, carried out on 19 – 21 June, and September 1999.

## 9.4 History of the Yuen Long Area

The Yuen Long Plain to the south of Yuen Long has long been regarded as some of the most fertile and rich farmland in the Hong Kong area.

The oldest villages in this area probably date from the Yuan and Ming dynasties (fourteenth to sixteenth centuries), and it is probable that there has been a market to service the area in the general Yuen Long Town area since then. The present Market is at least the third, before the existing New Market, was founded in 1898, the local market was the Yuen Long Old Market, which still survives to the north-east of the town, but the Old Market itself was only founded in the late seventeenth century, replacing an older market called Tai Kiu Tun Market – 大橋墩墟, which lay to the west, near the Yuen Long Tin Hau Temple. Other villages in the area were founded mostly in the eighteenth and nineteenth centuries.

The area south of Yuen Long Town has been known as Shap Pat Heung (十八鄉) "The Eighteen Villages" for many generations. This area was traditionally under the social and political domination of the Tang clan of Kam Tin, the owners of the Old Market at Yuen Long, although the villagers of the Shap Pat Heung were always restive under this control, and sought to make themselves independent of the Tangs. The Shap Pat Heung villagers thus founded a temple for themselves at Tai Shue Ha half way between the town and the mountains in the early eighteenth century, and established social organisations for themselves centred on this temple, without any Tang input. Nonetheless, the Shap Pat Heung villagers were still very much under the control of the Tangs when the British took over the New Territories. The Tangs were the master-minds of the

"Five Days War", when some local villagers, under Tang leadership, tried to fight off the incoming British. The Tangs were able to coerce the Shap Pat Heung villagers to join in the fighting, despite great unwillingness on their part to do so (the Shap Pat Heung villagers established a Hero Shrine in the Tai Shue Ha Temple to remember those who died in this fighting). As a result, almost the very first petition received by the British authorities from the New Territories after the take-over was from the Shap Pat Heung villagers, beseeching the British to protect them from the "bullying" of the Tangs.

In 1898 the present Yuen Long Market was founded, in part as a reflection of the problems outstanding between the Tangs and the villagers of the Shap Pat Heung. When the British, a few years later, built the Castle Peak Road on a line adjacent to the New Market, the Old Market fell into desuetude, and the Shap Pat Heung villagers were able to throw off their old dependent status.

The YLH passes close to seven or eight of the ancient villages of the Shap Pat Heung.

In the 1920s, after the Castle Peak Road was made motorable, this part of the Yuen Long plain developed rapidly as a market-gardening centre, supplying pigs and poultry, vegetables and flowers to the markets in Hong Kong and Kowloon. Many new houses sprang up in the fields between the old villages, especially in the Shung Ching San Tsuen and Tong Yan San Tsuen areas. Some were mere huts, where the new cultivators lived; others were very lavish and fine Chinese style houses, where rich men, unable to live in China because of political differences with the Warlord or Kuomintang authorities in Canton lived in exile. By the coming of the Japanese, much of the area near Yuen Long Town and the Castle Peak Road was full of such new structures.

After the War, this was an area very quickly re-occupied by squatters, almost all of whom were market-gardeners, although some squatter factories were soon opened in the Tong Yan San Tsuen and Lam Tei areas. By the 1970s parts of the area were very thickly covered with these squatter agriculturalists, although the areas close to the old Shap Pat Heung villages mostly remained clear, and in the control of the indigenous clans.

The original YLH was built on a raised embankment across the centre of the area previously occupied by fields of vegetables and flowers and over small factories and pig-farms. The line of the road was designed to avoid the old Shap Pat Heung villages, but it has crossed most of the area's Fung Shui lines. Field surveys suggest that the areas of planting, and the areas where the road was built with retaining walls rather than sloping earth embankments were to some extent, designed to mitigate the effects on Fung Shui.

The southern half of the Highway, from Tong Yan San Tsuen to the Lam Tei area, runs along the southern edge of the Yuen Long Plain, along the edge of the mountains. This was never a significant agricultural area, although a few small fields exist here and there. There are few if any villages close to the line of the road in this sector, although there are many graves. The Fung Shui effects of the road in this sector are far less than those in the northern part of the Highway, especially as it tends not to be built on an embankment.

## 9.5 Potential Impacts Upon the Cultural Heritage along the Alignment

### 9.5.1 Introduction

As described in Section 9.2.1 the criteria for consideration of impacts upon cultural heritage as defined in the EIAO relates to identified 'sites' and in general impacts upon identified sites of unique archaeological, historical or architectural value are considered as highly significant.

The following section identifies those sites, which are considered to be of cultural value. In addition, where relevant it presents an indication of general cultural value of each village area, including the Fung Shui. Whilst an assessment of impacts upon Fung Shui is included for each village, this is not an identified assessment criteria of the EIAO and therefore general recommendations are made, where necessary, to minimise the disturbance to this element of the general cultural heritage of the area rather than specific mitigation measures, unless these are consistent with landscape mitigation proposals.

### 9.5.2 Existing Villages along the Alignment

There are nine villages along the alignment in the vicinity of the Works, (see Figure 9.1). However, it is considered as the widening works will be retained within the existing highway reserve, no traditional structures or post-War structures would be directly affected by the proposals. The villages along the length of alignment under consideration include; Kong Tau San Tsuen (港頭新村), Tai Kei Leung (大旗嶺), Shung Ching San Tsuen (崇正新村), Sham Chung (深涌), Tin Liu (田寮), Lung Tin (龍田), Ma Tin (馬田), Lam Hau (欖口), Tong Yan San Tsuen (唐人新村) (especially that part of it known as Sha Tseng (沙井), Fui Sha Wai (灰沙圍), and To Yuen Wai (桃園圍).

The cultural heritage value of these villages is discussed below, and features which are sensitive to disturbance, which should be avoided where possible, are considered.

#### *Kong Tau San Tsuen*

Kong Tau San Tsuen is located about 125 metres from the edge of the road reserve. This village is an extension of Kong Tau Village, which lies behind it, a little under 500 metres from the road. This village has several resident clans and consists of a fine row of traditional houses (see Plate 9.1), which are considered worthy of preservation. This is the one of the finest group of surviving New Territories traditional houses in the general Shap Pat Heung area.

The village faces squarely into the embankment of the Highway, and the existing Highway thus damages the Fung Shui of the village. There is a significant amount of planting on the present embankment, which acts to mitigate the damage to the Fung Shui and there is a small stream about 100m to the west of the village, which has fung shui significance for the village.

#### *Sensitive Features of the Village*

The stream to the west of the village is of considerable Fung Shui significance to the village. Whilst not anticipated at this stage, any straightening or culverting of this stream further south than the edge of the existing road-reserve would adversely affect the Fung Shui of the village. Disturbance to the Fung Shui planting should be replaced as necessary.

### ***Tai Kei Leng and Fraser Village***

Tai Kei Leng is used as the name of a large area, stretching from the southern edge of Yuen Long Town almost as far as Nga Yiu Tau Village 700 metres south of the Highway. The original village stands at the northern end of this large area, immediately south of Yuen Long Town, about 500 metres from the Highway, and faces north-north-west, with its back to the Highway. The rest of the area is mostly squatter structures, with a light scatter of legal, but recent, building. Almost all the structures near the Highway are squatter structures.

Fraser Village, (see Figure 9.2) south west of Tai Kei Leng, and about 100 metres from the toe of the road reserve is not an indigenous village, but a "resite area", of squatter huts built on permits.

#### *Sensitive Features of the Villages*

Neither of these villages has features sensitive to the Works.

### ***Shung Ching San Tsuen***

Shung Ching San Tsuen is the name of an area rather than a discrete village. The centre of the area is the path running east from Tai Tong Road, and this path is about 400 metres from the toe of the road reserve.

This area was developed in the fields lying between Sham Chung and Kong Tau villages (mostly in the area between Tai Tong Road and Tai Shu Ha Road West) in the 1920s and 1930s. Many refugees from the Kuomintang and Warlord Governments in Canton settled here. These were elite figures, who arrived with a good deal of wealth. They built a whole series of spectacularly fine Chinese-style houses here – which are considered the best of their kind in Hong Kong (see Plates 9.2A and 9.2B). Three or four of these houses have been identified by the Antiquities and Monuments Office as being worthy of consideration for preservation. Most of these fine houses remain extremely well-maintained and inhabited today. Around these fine elite houses some smaller structures were built in the same period, mostly towards the northern end of the area, closer to the Castle Peak Road, where immigrants established market-gardens, etc.

The northern edge of the area, near the Highway, contains a number of small legal structures dating from the 1920s and 1930s, mostly substantially re-built, and some squatter structures. One slightly larger 1920s-1930s house stands about 25 metres back from the Highway (see Plate 9.2A (i)), although it is not as fine as the premises further to the south.

#### *Sensitive Features of the Village*

All the premises identified by the Antiquities and Monuments Office as worthy to be considered for preservation lie between 400 and 500 metres from the Highway, and are therefore not considered likely to be affected by the proposals. There are no other features considered sensitive to the proposals.

### ***Sham Chung***

The nearest house is around 20 metres from the edge of the road reserve although there is a DSD reserve between the village and the Highway, (see Figure 9.2).

This is a large and compact village, mostly of the Chan (陳) clan. The architecture is indistinguished, but there are still a few traditional buildings in the village (see Plate 9.3).

The Fung Shui of this village is dominated by the stream which runs a little west of the village. The Fung Shui direction of the village is close to north-west. The Fung Shui line crosses the Highway close to where the Tung Lai Road goes under the Highway. The embankment of the present road is very close to the village, (see Plate 9.3) it is considered that it currently has a negative effect upon the Fung Shui, since it pinches the main Fung Shui direction. There is a screen of trees between the front of the village and the stream, which acts as a Fung Shui screen.

An access road was provided for the villagers within the road reserve as part of the construction project for the present Highway. A fine Pai Lau, or archway, has been built by the villagers across the entrance into this access road from Tai Tong Road. In addition, an Earthgod shrine stands to the north of the village, immediately on the edge of the road reserve (Plate 9.3).

#### *Sensitive Features of the Village*

It is considered that given the proximity of this village to the existing Highway it is generally sensitive to works in the area. The Fung Shui of the village would be adversely affected by alterations to the course of the stream, however, this is not anticipated under the widening scheme. Modifications to the existing planting on the embankment should be mitigated through replanting.

#### ***Tin Liu***

Tin Liu is about 160 metres from the alignment, to the west of Sham Chung. Tin Liu is a compact village, mostly of the Sit (薛) clan. Most of the houses of the village have been rebuilt in recent years and are of limited interest. The village, however, faces squarely into the embankment of the Highway, which cuts the village Fung Shui almost at right-angles.

The Fung Shui of the village is dependent on the stream to the east of the village, which has a shared Fung Shui with Sham Chung. There is also fine Earthgod on the western side of the village.

Although at a greater distance to the Alignment, Tin Liu village, shares the same problems of Fung Shui as does Sham Chung, and the same strip of the Highway embankment is important to both villages.

#### *Sensitive Features of the Village*

The features above for Sham Chung apply similarly to Tin Liu.

#### ***Lung Tin***

Lung Tin is located at a distance of about 400 metres from the Highway, (see Figure 9.3) This is a scattered village, mostly of the Wong (黃) clan. The block of buildings shown on Figure 9.3 are the closest to the Highway, most are much closer to Yuen Long Town. The Fung Shui direction of the village is towards the north: the village stands with its back to the Highway. There is a fine Study Hall in this village, the Lung Tin Shue Shat (龍田書室), dating as it stands today from 1928, but entirely traditional in form and decoration. Whilst this Study Hall is

worthy of consideration for preservation, it would not be affected by the works. Similarly, the existing alignment has minimal effect upon the Fung Shui of the Village.

#### *Sensitive Features of the Village*

The village is not considered sensitive to the existing alignment or the proposed works.

#### ***Ma Tin***

Ma Tin is located at about 400 Metres from the alignment (see Figure 9.3). This is a large and compact village, mostly of the Kwan (關) clan. The Fung Shui direction of the village is towards the north: the village stands with its back to the Highway. The village stands very close to Yuen Long Town, and should be considered part of the southern suburbs of the town. The village contains an interesting inscription of 1928, recording the re-paving of the road from Yuen Long to Tai Tong with granite slabs in that year.

#### *Sensitive Features of the Village*

The village is not considered sensitive to the existing alignment or the proposed works.

#### ***Lam Hau***

The nearest houses in Lam Hau are less than 5 metres from the road reserve, (See Figure 9.3) This is a large and compact village, with several resident clans. Many of the village houses have been rebuilt, but many still remain. The village has a fine God-house (San Teng, 神廳) at the end of the main lane of the village: the opening of this lane to the open space in front of the village is by a fine gateway (see Plate 9.4 A). This gateway is of interest in that it faces towards a direction slightly different from the direction of the bulk of the village houses. This "skewed Fung Shui" is known from elsewhere in the New Territories, but is very rare. Both the main Fung Shui line, and the slightly different one of the village Gateway are shown on Figure 9.3. The main Fung Shui line runs almost parallel to the Highway. The Gateway, San Teng, and possibly a number of the village houses are worthy of consideration for preservation.

Within the village, there remains a clear and strong "village feeling". The village retains a strong community and communal feeling to the present.

The village has a substantial Fung Shui wood on the west and north sides of the village: a fine earthgod shrine stands at the eastern end of the northern part of the Fung Shui wood (see Plate 9.4 B). The Fung Shui of the village is closely connected with a stream that runs across the front of the village about 250 metres from the village. There is a critically important Fung Shui area in front of the village which is defined by the village access road, which runs around the east and south sides of it.

The building of the present Highway damaged this Fung Shui system. Part of the Fung Shui wood was lost to the road. The road runs immediately along the northern boundary of the important Fung Shui area. The area at the foot of the retaining wall within this area has been developed as a village sitting-out area and ball-court (see Plate 9.4 B).

Partly due to the sensitivity of the fung shui in this area, the proposed widening in the vicinity of Lam Hau will be asymmetrical, thereby avoiding any further disturbance to the village.

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### *Sensitive Features of the Village*

There are a number of features sensitive to the existing alignment. Asymmetrical widening to the north of the village means that there are no areas sensitive to the proposed Works.

#### ***Tong Yan San Tsuen***

Tong Yan San Tsuen is a very large area, parts of which are close to the Highway, and other parts up to 600 metres away from it. This area was developed as a sort of "garden suburb", originally in the 1930s. After the War, much of the area was redeveloped as small factories, although there still remain a number of residential zones, mostly on the southern edge of the area, between 400 and 600 metres from the Highway. Almost all the area within 100 metres of the Highway is taken up with factories. The Outline Zoning Plan shows most of the area zoned as "Industrial", but with the eastern and southern edges of the area as "Residential (Group B)1". The area east of Tong Yan San Tsuen, currently mostly empty, except for some squatter structures, is zoned "Residential (Group D)". The area is hilly, and even quite close to the Highway the influence of the road is muted in consequence.

On the eastern side of Sha Tseng Road, between 75 and 150 metres from the road, and on the western side of the Tong Yan San Tsuen Interchange slip-road, there is the residential area known as Sha Tseng Village. This small residential area overlooks the Tong Yan San Tsuen Interchange and is of limited interest.

### *Sensitive Features of the Village*

It is considered that there is nothing in the Tong Yan San Tsuen area that is sensitive to the proposed works.

#### ***Fui Sha Wai***

Fui Sha Wai is located about 200 metres from the alignment, (see Plate 9.5). This is a large and compact village, mainly of the Tang (鄧) clan. The village is rather shabby. It has a fine, if ill-maintained, gateway, with a Fung Shui pond in front of it. The Fung Shui direction runs almost straight towards the Highway. The village thus faces towards the Highway, at a slight angle, the Highway running closest to the village on the south-east side. There are some isolated individual houses on the eastern side of the village: some of these come to within 100 metres of the road.

### *Sensitive Features of the Village*

The existing Highway is not exceptionally intrusive at the front of the village. The village Fung Shui is damaged, albeit not to too great a degree by the existing Highway. There are no features particularly sensitive to the proposed Works.

#### ***To Yuen Wai***

The nearest houses at To Yuen Wai are less than 5 metres from the Highway slip-roads, (see Figure 9.4). This village, mostly of the Lei (李) clan was previously a small village, rather scattered. Most, if not all of the houses have been rebuilt recently, and many new houses have also been added. This growth is associated with the improved road connections with the

Highway and the Castle Peak Road. Because of these connections, the village has developed as a middle-class suburb or Tuen Mun New Town.

The village comprises four separate areas. The Old Village (Area "A" on Figure 9.4) faces west. Only one pre-War house remains (shaded on Figure 9.4). Several house-sites are vacant: the majority have been rebuilt within the last fifteen years.

The village as built has a number of houses on the west and south, which are built right up against the line of the Highway and the sliproads of the Lam Tei Interchange. In most cases, these houses are only separated from the Highway or its sliproads by a narrow lane, 3 or 4 metres wide at best (See Plate 9.5).

South of the Old Village, the New Village (facing north: marked "B" on Figure 9.4) was built over the last fifteen-twenty years. It consists of two rows of modern "villas". Between the Old Village and the New Village an access road leads to a square car-park, recently roofed over.

South-west of the village is an Earthgod Shrine. This shrine has been totally rebuilt in the last three years, and is now a concrete and glazed tile structure. It faces south, into the Highway. There is an area of open space around this shrine, used for lorry and car-parking.

The Old Village is completely insulated from the Highway by the New Village.

The Fung Shui line of the Old Village runs parallel to the Highway, and the Highway scarcely affects it. The existing Highway does affect the Fung Shui of the village Earthgod Shrine, but no further impacts to the Fung Shui of this shrine are anticipated by the widening proposals.

#### *Sensitive Features of the Village*

Given the existing disturbance to this village, the impacts to the cultural heritage of this village as a result of the proposed widening works are considered insignificant.

### **9.5.3 Potential Impacts to the Archaeology of the Study Area**

It is considered that the proposals for widening the Yuen Long Highway from a Dual-2 lane to a Dual-3 lane road will have no effect on the existing archaeological potential of the area. The works will be maintained within the existing road reserve, which has already suffered disturbance as a result of the original construction works in 1989/94. Therefore, no intrusive archaeological surveys have been deemed necessary.

The eastern half of the existing Highway is built on a high embankment. The widening will take place by replacing the existing embankment with a toe-wall, and a steeper embankment, or a retaining wall.

The road-widening proposals, since they will occupy only the same area in most places as the existing embankment, will not, therefore, cause any further damage to the archaeological potential of the Highway or the Study Area.

#### 9.5.4 Potential Secondary Effects of the Works on Buildings of Cultural Heritage Importance

In addition to the direct effects that the construction and operation of the works may have on the adjacent cultural heritage and archaeology, potential indirect affects associated with widening have also been considered.

##### *Groundwater, Drainage & Vibration*

Under certain circumstances, construction works can influence the groundwater levels and flows to an extent that may in turn affect the stability of adjacent buildings. As might be expected, any effect caused by such changes would be more pronounced on older buildings.

A Drainage Impact Assessment, (DIA) was carried under this assignment to assess the impacts to the existing drainage regime caused by widening to dual-3, (Scott Wilson (HK) Ltd. (1999) Widening of Yuen Long Highway between Lam Tei and Shap Pat Heung Interchange- Preliminary Design and Ground Investigation Assignment: Final DIA Report). The DIA evaluated the impacts in terms of the highway drainage, local drainage and regional drainage systems. As might be anticipated, the widening is expected to increase the volumes of runoff affecting the highway drainage system, and modifications will be included as part of the design to ensure an acceptable capacity is maintained as part of the works.

Potential impacts upon the local and regional drainage are considered to be insignificant. In addition, the buildings identified as being of heritage interest are located at some distance from the Highway, thereby further reducing any potential impacts upon them from localised fluctuations in groundwater. In addition, another secondary impact, which may affect old sites of cultural heritage interest in certain circumstances, is ground-borne vibration. However, such impacts tend to occur in more urban areas, given the rural location of the highway and the relative distance from the buildings of cultural heritage interest, no impacts associated with vibration emanating from the highway are anticipated.

#### 9.5.5 Grave Sites Along the Alignment

The grave - sites were identified through site visits, their locations are shown in Figure 9.1. Those shown represent the major graves or groups of graves known to exist close to the Highway. All are major Clan graves. It is not known what villages these are the graves of, but they are presumably graves belonging to the nearby villages.

In general terms widening of the road, resulting in bringing the road closer to the grave, would affect the Fung Shui of the grave, albeit only marginally in most cases. However, as the works will not result in resumption or direct impacts to the grave-sites, potential impacts are not considered to be significant.

#### 9.6 Recommended Mitigation Measures

No specific mitigation measures to prevent impacts upon those identified sites of cultural heritage importance are deemed necessary. Mitigation measures generally relate to best practices described for other Chapters to avoid unnecessary disturbance to villages including the provision of replacement planting to compensate the loss of woodland and Fung Shui screen planting as described in Chapter 8.

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## 9.7 Conclusions

Key sites of cultural heritage interest identified by the Antiquities and Monuments Office occur in Shung Ching San Tsuen and lie at some distance from the Highway (between 400 and 500 metres). These sites will not be impacted by the proposals either directly, or indirectly.

There are a number of villages along the alignment, which have general features of cultural heritage interest. However, many of these features, (such as Fung Shui) have been affected to some degree by the existing Highway.

Areas of interest include the earth-gods at Sham Chung and Lam Hau. As the proposals do not involve the resumption of additional land, impacts upon these features are not considered significant, and impacts to general disturbance will be offset through mitigatory planting or suitably designed retaining walls as described in Chapter 8. The potential for nuisance around Lam Hau (to the south of the alignment) has been reduced further by incorporation of asymmetrical widening to the north of the Alignment within the Preliminary Design.

Potential impacts of the widening scheme upon existing graves sites and the archaeology of the surrounding area are considered insignificant.

In general, works in the vicinity of the existing villages should be carried out in a manner sensitive to the needs of the local villagers.