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11. CULTURAL HERITAGE IMPACTS

11.1 *Introduction*

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

11.2 *Legislations and Applicable Standards*

Environmental Impact Assessment Ordinance

11.2.1 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 TMEIAO-TM outline criteria for evaluating the impacts on sites of cultural heritage and guidelines for impact assessment, respectively. The EIAO-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.

Antiquities and Monuments Ordinance

11.2.2 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.

11.2.3 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 license under the Ordinance.

11.2.4 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.

Archaeological Organisations

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

11.3 Study Methodology

11.3.1 The investigation of the cultural heritage of the area follows the approach identified in the EIA TMEIAO-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 minimized 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.

11.3.2 Besides, according to the requirements stated in the EIA Study Brief, special attention shall be paid to the following historical building and structures:

- Chan Ancestral Hall;
- Old House of Former Hoi Pa Village (Formerly Lot 956);
- Old House of Former Hoi Pa Village (Formerly Lot 917);
- Grave of Tang Yuk; and
- Wang Fat Ching She

11.4 History of the Tsuen Wan Area

General Topography of Tsuen Wan

11.4.1 Tsuen Wan is a generally hilly district. To the north, the mountains rise up steeply to the Tai Mo Shan, Hong Kong's highest peak. From Tai Mo Shan two ridges run down to the coast: to the east, the steep Golden Hill - Needle Hill Ridge (Smugglers' Ridge), and, to the west, the Shek Lung Kong - Lin Fa Shan Ridge. The mountains thus surround the district on all sides except the south-west, where the district opens out to the sea. Before development sharply changed the topography of the area, the sea-coast comprised two bays, Tsuen Wan Bay and Gindrinks' Bay, separated by a steep rocky headland. The district's arable land lay at the head of these two bays. There was a little

flat land close to the coast in both areas, although most of the arable land lay on terraces climbing the lower parts of the hillslopes. A number of streams ran down the sides of the mountains through these arable areas to the sea. Much of Gindrinkers' Bay was tidal mudflats, and this must once have been true of Tsuen Wan Bay, too, but at some date before the mid-eighteenth century the eastern part of these mudflats was reclaimed by the villagers to provide more arable land. The original sea-coast runs close to today's Castle Peak Road in the Tsuen Wan Bay area: the sea-coast after the eighteenth century villager reclamation lay close to Tak Wah Street. The eastern coast of Tsuen Wan Bay lay close to today's Texaco Road (see Figure 10.1). The coasts of Gindrinkers' Bay lay close to today's Kwai Chung Road to the east, and to Kwai Fuk Road - Hing Fong Road to the west.

Founding History of Tsuen Wan Area

- 11.4.2 Tsuen Wan has been settled for a long time. In the 10th Moon, 1277, the fugitive Sung Court stayed at Tsuen Wan (淺灣) for a few weeks. It is, perhaps, unlikely that the Court would have chosen a site which was then quite uninhabited, and it is thus probable that there was at least some settlement here then. However, the Court did spend some time at various places resident on their ships, and it remains possible that during the stay at Tsuen Wan the Court remained on their ships, not on shore, in which case the stay of the Court here would be compatible with the land being uninhabited then. By the late Ming, however, there was certainly settlement here. In the 1688 Hsin An County Gazetteer (新安縣志) there is a list of the villages of the County, with a note stating that the list was "taken from the old Gazetteer", i.e. the late Ming Gazetteer (late sixteenth century). In this list both Tsuen Wan (淺灣村) and Kwai Chung (葵涌村) appear. There must thus have been a settlement at the head of both bays by the late Ming.
- 11.4.3 In 1662, however, the new Ching Government drove all the inhabitants of the coastal areas inland, to deny any assistance which they might have given to the Ming remnants under Koxinga on Taiwan. The Tsuen Wan and Kwai Chung areas would certainly have been cleared in this Coastal Evacuation. The Government made no provision for the sustenance of those it ejected from their homes in this Evacuation. Huge numbers, deprived of the fields which were their only means of subsistence, died of starvation before the Coastal Evacuation Order was rescinded in 1668. In many places no-one survived to return in 1668. This is the probable fate of the descendants of the late Ming settlers in Tsuen Wan and Kwai Chung. None of the present-day village clans of the area claim that their ancestors were settled there before 1662: they all claim to have settled there in the late seventeenth or eighteenth century. Presumably, therefore, the earlier settlers failed to survive the Evacuation. Archaeology has, to date, failed to provide any evidence as to where the late Ming villages were, but it is quite likely that the Tsuen Wan village of the late Ming was at Lo Wai (老圍, "The Old Village"), and the late Ming Kwai Chung village at Sheung Kwai Chung, which is where the first of the post-Evacuation villages were established.
- 11.4.4 After 1668 the area was re-settled entirely by Hakka clans. Tsuen Wan (with Sha Tau Kok) is one of the only two districts in Hong Kong which are entirely Hakka. The first of the Hakka settlers built their homes at Lo Wai and Sheung Kwai Chung, at the foot of the mountains, as far back from the coast as possible (the sites of Lo Wai and Sheung Kwai Chung are off Map 110 to the north). This is a common phenomenon in

the broader New Territories area, where the Ming and early Ching villages tend to be built well back from the coast, to reduce the risk of attack by pirates (another good example is Tung Chung, on Lantau, where the oldest village is Shek Mun Kap, sited as far back from the sea-coast as possible). Lo Wai was established in the late seventeenth century. It may, as noted above, have been founded on the site of an older abandoned Ming village.

Tsuen Wan Area in Eighteenth and Nineteenth Centuries

- 11.4.5 Most of the larger villages near the coast in the Tsuen Wan area such as Sam Tung Uk, Muk Min Ha and Kwan Mun Hau seem mostly to have been established in the early eighteenth century. The reclamation of the eastern mudflats was probably undertaken in the middle eighteenth century. Two villages stand on this reclamation - Hoi Pa and Yeung Uk (this latter village was also called Sha Tsui) - and date from as soon as the reclamation was finished, i.e. the middle eighteenth century. Shortly after the establishment of Hoi Pa (certainly before the end of the eighteenth century), a market to serve the district was established. It consisted of a row of shops built along the sea-wall. The top of the sea-wall (which was an earthen bank) acted as a street, and the shops stretched back from this footpath, supported on stilts. In front of the market was a pier, which was the normal landing-place for the district.
- 11.4.6 In the late eighteenth and early nineteenth centuries, a few small settlements were established in the more marginal land at the edge of the district - Pak Tin Pai (also known as Pak Tin Pa), Chai Wan Kok, and Yau Kam Tau are among these late-settled villages.
- 11.4.7 Most of the Kwai Chung villages stand at the head of Gindrillers' Bay, off the map at **Figure 10.1**. Only the site of Ha Kwai Chung (probably a late-eighteenth century foundation) lies close to the line of the Tsuen Wan Road.

Development of Village & Culture in Tsuen Wan Area

- 11.4.8 As was the normal practice in the broader New Territories area, the villagers of Tsuen Wan had an oath-sworn inter-village mutual-defence pact linking them together so that the strength of the villages could be combined if an attack by pirates or bandits made this desirable. The Tsuen Wan oath-sworn district covered Tsuen Wan, Kwai Chung, Tsing Yi, and as far to the west as Ma Wan (today's Tsuen Wan and Kwai Tsing Districts approximate the area of the old inter-village alliance). The inter-village alliance area, however, saw itself as forming four communities - Tsuen Wan, Kwai Chung, Tsing Yi, and Ma Wan - each of which was, for most matters, self-governing, although, when necessary, they would join together for defence. Tsing Yi and Ma Wan were linked to Tsuen Wan by sampan ferries, which landed at the market pier.
- 11.4.9 Each of these four village communities had its own community temple. The Tsuen Wan temple was the Tin Hau Temple built a little inland of Sam Tung Uk village, and the Kwai Chung temple was another Tin Hau Temple, built on the sea-shore near Ha Kwai Chung village (the present temple at Ha Kwai Chung is not the original, however, but a resited structure, dating from the 1950s). The Tsuen Wan temple has in it a bell, which was cast "to stand for ever before the altar of the Lady Tin Hau at Tsuen Wan (淺灣天后娘娘殿前永遠供奉)" in 1743: this probably dates the final completion of the temple, although the temple itself may be a few years older.

- 11.4.10 The traditional economy of the area was rice subsistence farming. All the villages were rice-farming settlements. In addition, most of the villages also owned one or two fishing sampans, which fished in the inshore waters of the bays and around the coasts of Tsing Yi. The fish caught were mostly eaten by the villagers who used the sampans, but there was also a small community of Tanka fishermen who caught fish for their livelihood and who used the Tsuen Wan Bay as their home anchorage, and the Tsuen Wan Market as their base.
- 11.4.11 The Tsuen Wan villagers, however, also exploited the wooded slopes of the Tai Mo Shan, cutting bamboo and rattan, and making sieves and other implements with what they cut, and also cutting wood for fuel. The larger villages in the area also kept packs of hunting-dogs, which were used to hunt wild-boar on the hills. The villagers also grew their own tea and gathered medicinal herbs on the hillslopes, although they seem to have sold only a little of the tea they made, keeping most of it for their own use. Before 1841, the "mountain goods" produced by the villagers were probably mostly sold in Kowloon City, but, after the foundation of the City, they were mostly carried to the City for sale.
- 11.4.12 As for many other communities along the New Territories coasts, the foundation of the City of Hong Kong in 1841 brought considerable change to Tsuen Wan. The new City had an insatiable need for fresh vegetables, fire-wood, fresh fish, poultry, and meat animals. All the communities within easy reach of the City began to set aside some of their arable land to providing for this new market. Tsuen Wan was one of these. Within three or four years of the establishment of the new City, sampan ferries were linking the City with Tsuen Wan, carrying foodstuffs and fuel for sale in the City. By the early twentieth century, these ferries were steam-ferries. Market-gardening brought a good deal of prosperity to the district.
- 11.4.13 It was by way of the ferries carrying the market-gardening produce between Tsuen Wan and the City that the first missionaries reached Tsuen Wan from the City. The first known were Catholic priests, who established a chapel here, near the Market, as early as 1847.
- 11.4.14 During the second half of the nineteenth century, the Tsuen Wan area became well-known to the more adventurous Westerners living in the City. Men would come out to Tsuen Wan by the sampan ferry, and hire bearers at the Market, and be carried up the Tai Mo Shan to shoot pangolin or to hunt wild-boar there. There are a number of accounts extant of such pleasure trips.
- Development of Tsuen Wan Area in Early Twentieth Century*
- 11.4.15 After the opening of the Castle Peak Road between Shamshuipo and Tsuen Wan (1917), the area became even more exposed to the influence of the City. Lorries and buses began to run along the new road as soon as it was opened. This increased, in particular, the opportunities and profits from market-gardening. Various groups seeking sites near and accessible to the City, but not within the urban area, also started to buy land and build in Tsuen Wan.
- 11.4.16 One of these groups which settled in Tsuen Wan in some numbers were Buddhist and other religious fleeing from the Kuomintang "Anti-Superstition Campaign" in Canton (this peaked 1926-1927). Several groups of refugee monks and nuns found Tsuen Wan a convenient place to re-establish themselves. It is to this period, for instance, that the

- Chuk Lam Sim Yuen (竹林禪院) to the west of Lo Wai was established (completed 1931-1933), the Tung Po To Sim Yuen at Lo Wai (東普陀禪院, with a bell of 1919, but essentially dating from 1933-1937), the Kin Yuen Tung (乾元洞, 1939), the Wang Fat Ching She at Chai Wan Kok (弘法精舍, 1939), and a number of other places. This establishment of Buddhist and other religious houses in Tsuen Wan was part of a wider trend: other refugee monks and nuns were establishing houses at exactly this same period in other suburban areas, like Sha Tin and Tai Po, as well as on Lantau.
- 11.4.17 Other groups looking for land here after the opening of the Castle Peak Road were businessmen who needed remote but accessible sites. One such group were lime-burners. Lime was an essential product for the building trade, but the burning of lime was intensely polluting, and the Government forbade lime-burning within the urban area in consequence. Lime-burners established themselves at a number of suburban places (Sai Kung and Ping Chau, for instance), but many found Tsuen Wan, and particularly Tsing Yi, a good site - the product was sent to the City by the steam-ferries.
- 11.4.18 Another early industrial newcomer was the Hume Pipe Works, which settled on the coast between Chai Wan Kok and Yau Kam Tau in the 1930s (the site is under today's Belvedere Gardens). This company was interested in this site because land here was cheap, and this company required a great deal of space for its work. The site was immediately adjacent to the Castle Peak Road, and the products were sent out by lorry.
- 11.4.19 The most important of these early industrial establishments at Tsuen Wan, however, was Texaco Oil. The Government required the oil companies operating in Hong Kong to establish their oil depots in remote places where there was no risk of any explosion harming nearby residents. Texaco Oil chose the tip of the headland between Tsuen Wan Bay and Gindrinkers' Bay for their depot. The site had good sea access, and the oil was brought to the site by lighters. Road access was also secured by a new road (Texaco Road), which was built from the depot site to the Castle Peak Road near Kwan Mun Hau. The oil depot was established here in the 1920s.
- New Town Plan Development in Tsuen Wan Area after World War II*
- 11.4.20 In the years immediately after the War, the Tsuen Wan area, because of its ease of access from the City, soon became the site of a large number of squatter-huts. The largest concentrations were at Tai Wo Hau, on the hill between Tsuen Wan and Kwai Chung, and on the fields of the villages north of Castle Peak Road. Most of the squatters lived here but worked elsewhere (buses had linked Tsuen Wan and Kowloon along the Castle Peak Road ever since the road was opened). However, many of the squatters in the area north of the Castle Peak Road opened small squatter factories there. Others were market gardeners, growing vegetables in the gaps between the squatter factories. Squatters started to move into Tsuen Wan in some numbers from the middle 1950s.
- 11.4.21 Also in the middle 1950s, the Government started to use Gindrinkers' Bay as a site to dump refuse. By the late 1950s the whole bay had been filled with refuse. This gave the bay its current Chinese name, Lap Sap Wan (垃圾灣, "Rubbish Bay") - the previous name was Kwai Chung Bay.
- 11.4.22 In the middle 1950s, the Tsuen Wan area started to develop. The first developments were new buildings (mostly five or six storey tenement buildings) along the Castle

- Peak Road. There was no Town Plan governing the area at this time, and the development was piecemeal and scrappy. The dangers of unplanned development here was so great that the Government introduced a Town Plan in 1959, to develop the area as Hong Kong's second New Town (after Kwun Tong, which began development in 1954).
- 11.4.23 The New Town plan required the reclamation of Tsuen Wan Bay. Much of the new development was to be put on this new reclamation. The Gindrinkers' Bay area was also to be developed, both the area reclaimed in the 1950s by the dumping of refuse, and the hillslopes to east and west, together with the land east of Sheung Kwai Chung at the head of the valley. Rather later, Tsing Yi was added to the New Town, being linked to Kwai Chung, at first by one bridge (opened in 1974), later by two and then by several. The early 1970s also saw the New Town extended by the development of the Container Port off the mouth of Gindrinkers' Bay (the first berth opened to traffic in 1972). In the initial New Town plan, the area north of Castle Peak Road was to be left undeveloped, but this area was added to the New Town after the construction of the Mass Transit Railway (opened to traffic in 1982).
- 11.4.24 The first Public Housing Estate within the New Town, the Resettlement Estate at Tai Wo Hau, was opened in 1961 (other sections were opened in 1966). Other early Housing Estates were Fuk Loi (1963), Kwai Chung (1964), Shek Lei (1966 and 1968), Lei Muk Shue (1970), and Kwai Shing East (1972) but most of the Housing Estates in the area were built after 1972.
- 11.4.25 The largest of the squatter areas, in the Tai Wo Hau area, was cleared in the middle 1960s for the construction of the Tai Wo Hau Resettlement Estate. The other large squatter area, north of Castle Peak Road, was cleared for the construction of the Mass Transit Railway.
- 11.4.26 Apart from the Public Housing Estates, the New Town was developed for private housing (originally mostly in the form of five or six storey blocks of small flats for working-class residents, on the central part of the new reclamation area), and industry (both at the eastern end of the new reclamation, and at the western end, between Yau Kam Tau and Pak Tin Pai), and along the eastern side of Gindrinkers' Bay, in the Tai Lin Pai area. Middle-class housing came mostly rather late in the development of the New Town, in the 1980s and 1990s, with developments such as Villa Esplanade on Tsing Yi, Riviera Garden (built over the site of the old Texaco Depot), Wonderland Villa and Highland Park on the hills above Lai King, Allway Garden, and Tsuen King Garden on the site of the old Chai Wan Kok Village, Belvedere Garden and Bayview Garden on the site of the old industrial area between Yau Kam Tau and Chai Wan Kok, and with a whole string of fine developments along the coast between Tsuen Wan and Sham Tseng.
- 11.4.27 Surprisingly little survives of the first few years of the New Town development. Many of the first generation of the area's Public Housing Estates have been demolished and rebuilt, as have many of the first generation of private housing blocks. The oldest industrial area, in the Yau Kam Tau area, has completely disappeared, as has that between Pak Tin Pai and Muk Min Ha to the north of the Castle Peak Road (the old China Dyeworks site).

11.4.28 Development of the New Town, however, has led to the disappearance of most of the area's old villages. Pak Tin Pai, Chai Wan Kok, Muk Min Ha, Kwan Mun Hau, Yeung Uk, and Ha Kwai Chung have all totally disappeared, their villagers having been resited to new villages along the northern edge of the town. Nothing survives of the old Market, either. A few houses survive, restored as Monuments, at Hoi Pa, set rather forlornly in a public park which covers the site of the rest of the old village. The main part of the village of Sam Tung Uk survives, restored and used as a Museum. Yau Kam Tau, Lo Wai, and Sheung Kwai Chung survive as village communities.

11.5 *Potential Impacts Upon the Cultural Heritage along the Alignment*

Introduction

11.5.1 As described in **Section 11.2** 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.

11.5.2 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 minimize 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.

Existing Villages and Historic Buildings along the Alignment

11.5.3 The cultural and historical heritage of Tsuen Wan is concentrated primarily in those areas which were developed before 1959, and secondarily in the New Town Development areas developed in and after 1959. The primary area is thus all on that land which existed before the 1959 reclamation, and is centred on the old villages of that area. As can be seen from **Figure 11-1**, the Tsuen Wan Road is located a very long way from any of these areas. The villages of Chai Wan Kok, Pak Tin Pai, Muk Min Ha, Yeung Uk, Kwan Mun Ha and Ha Kwai Chung, together with the old Market, have all been utterly destroyed, and their sites, and all the land close to them, have been totally destroyed. The sites have been dug out, and new roads and multi-storey development Projects have been built over them. There remains absolutely nothing of the slightest cultural or historical heritage value in any of these village areas.

11.5.4 However, there are still some villages along the alignment in the vicinity of the Works, (refer to **Figure 11-1**). The cultural heritage value of these villages is discussed below.

Yau Kam Tau Old Village

11.5.5 Of the old Tsuen Wan village areas of which anything still survives, none are close enough to the By-pass for any work on it to have the slightest effect on the village community or on any remaining structures of cultural and historical heritage value. Thus, Yau Kam Tau old village lies almost 1½ miles from the closest point of the proposed new work, and the intervening area is very fully developed with multi-storey residential developments. The new works will not be able to be seen from the village, and the site is too far distant for any noise to affect the village. Furthermore, Yau Kam

Tau village contains very little of any substantial cultural or historical heritage interest or value, the village having been almost entirely redeveloped in recent years.

Sam Tung Uk

- 11.5.6 The restored and preserved village at Sam Tung Uk, on the other hand, is of the highest cultural and historical heritage value. However, it stands a full $\frac{3}{4}$ mile from the nearest point of the By-pass. The intervening space is the heart of the 1959 New Town, a densely-packed mass of residential buildings. There is no chance that the new By-pass works could conceivably affect the site. The By-pass cannot be seen or heard from Sam Tung Uk.

Hoi Pa

- 11.5.7 Much the same is true of the various preserved buildings at Hoi Pa, including the three of them mentioned in EIA Study Brief: “the Old House of Former Hoi Pa Tsuen, formerly Lot 956 (Grade III Historical Building), the Old House at Hoi Pa Village, formerly Lot 917 (Declared Monuments), and Chan Yi Cheung Ancestral Hall, formerly Lot 972 (Grade III Historical Building)”: these all stand very close to each other at Site "B" on Figure 10.1). These are of very high cultural and historical heritage value, but are over $\frac{1}{2}$ mile from the work-site, with a dense mass of multi-storey residential buildings between them. The sites are out of sight and out of sound from the Tsuen Wna Road, and the works cannot conceivably affect them. Indeed, it is certain that, even with the most sophisticated equipment in use today, it would be impossible even to detect that the works were in hand from the sites of the preserved buildings, given the high ambient noise levels and the closed-in development of the surrounding areas.

Wang Fat Ching She

- 11.5.8 The Wang Fat Ching She (at Site "A" on **Figure 11-1**) is one of the religious establishments founded in Tsuen Wan in the aftermath of the Anti-Superstition campaign in Canton in the 1920s. The temple bell, and two sets of wooden hanging boards in the temple, have inscriptions dated 1939. This is the date when construction of the temple was completed. This religious establishment is of moderate cultural and historical heritage value. The She lies very close to the Tuen Mun Highway (less than 100 metres from the line of the road), and must have been seriously affected by the building of the Highway. The She is affected substantially by the noise of the Highway, which has also damaged its Fung Shui and amenity value (the Highway runs immediately behind the She). However, the proposed upgrading works of Tsuen Wan Road do not affect the Tuen Mun Highway in the vicinity of the She. The nearest point to the She where work will be undertaken is at the point where the Tsuen Wan Road joins the Tuen Mun Highway. This is 300 m from the She. There are, however, no buildings directly standing between the She and this point. The works will be visible from the She. However, the works are neither behind nor in front of the She, but off at one side, where the impact will be at its least significant. The distance between the She and the works-site is far enough that the noise nuisance of the new works will not be significant (especially given the overwhelming impact of the Tuen Mun Highway immediately adjacent to the She, which would certainly drown out any noise from the new works). The works-site is of no Fung Shui significance to the She. It is considered

that the proposed By-pass widening works will not affect the She in any significant degree.

- 11.5.9 Nonetheless, it should be noted and kept in mind that any changes to the works leading to changes in the development area near the junction of the Tsuen Wan Road and the Tuen Mun Highway might bring the works closer to the She, in which case damage might be more serious. A screen of trees planted between the She and the junction of the Tuen Mun Highway and the Tsuen Wan Road, while this is not considered essential as a reaction to the works as currently envisaged, might well be considered on general visual amenity grounds, and might become more urgent should the works-envelope be extended in this area.

Potential Impacts to the Archaeology of the Study Area

- 11.5.10 It is considered that the proposals for upgrading of the Tsuen Wan Road will have no effect on the existing archaeological potential of the area. The works will be maintained in the urban area, which has already suffered disturbance as a result of the original construction works and other associated construction works. Therefore, no intrusive archaeological surveys have been deemed necessary.

Grave Sites Along the Alignment

- 11.5.11 The ancient Tang clan grave between Pak Tin Pai and Chai Wan Kok (at Site "C" on **Figure 11-1**) is also of very high cultural and historical heritage value. This is the grave of Tang Yuk, the founder of the greatest of the New Territories clans, the First Ancestor of the villagers of Kam Tin, Ping Shan, Ha Tsuen, Lung Yeuk Tau, Tai Po Tau, and Loi Tung within the New Territories, as well as many other villages in the Tung Kuan area of China. Tang Yuk died in the middle eleventh century. This grave is of the very highest Fung Shui importance to the descendants of Tang Yuk. The grave has been carefully preserved, together with the hillock on which it stands, at all dates through the development process for Tsuen Wan. No further damage to this grave or its Fung Shui would be acceptable. However, the grave stands a full ¼ mile from the nearest point of the works as proposed. Between the grave and the line of the upgraded Tsuen Wan Road is the very dense mass of one of the major Tsuen Wan Industrial Areas. The line of the works cannot be seen from the grave, nor would any noise from the works or the new road be detectable from the grave. The development of the Industrial Area did damage the Fung Shui of this grave (and led to major complaints being received from the clan at the time), and the subsequent widening of the Castle Peak Road damaged it further, but the present proposed works will not damage the grave or its Fung Shui in any particular.

Recommended Mitigation Measures

- 11.5.12 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.

11.6 Conclusions

- 11.6.1 Key sites of cultural heritage interest identified by the Antiquities and Monuments Office occur in Wang Fat Ching She (WFCS) and lie at some distance from the Tsuen

Wan Road (about 100 metres). These sites will not be impacted by the proposals either directly, or indirectly. However, it is recommended that any works leading to changes in the development area near the junction of the Tsuen Wan Road and the Tuen Mun Highway should be noted in order to prevent any damage on the WFCS.

- 11.6.2 Potential impacts of the upgrading scheme upon existing graves site and the archaeology of the surrounding area are considered insignificant.