



香港觀鳥會

THE HONG KONG BIRD WATCHING SOCIETY

認可公共性質慈善機構 Approved Charitable Institution of Public Character

地址：香港九龍彌敦道 480 號鴻寶商業大廈 14 樓

Address: 14/F., Ruby Commercial Building, 480 Nathan Road, Kowloon, Hong Kong

電話 Tel. No.: 2377 4387 傳真 Fax. No.: 2314 3687 電郵 E-mail: hkbws@hkbws.org.hk

廣東省住房和城鄉建設廳

廣州市東風中路 305 號

省政府大院 5 號樓

郵編：510031

電郵：gdcdup@pub.guangzhou.gd.cn

Guangdong Province Housing and Urban-Rural Development Department

No.305, Dong Feng Zhong Road, Guangzhou, China

Zipcode: 510031

E-mail: gdcdup@pub.guangzhou.gd.cn

香港特別行政區政府環境保護署

香港灣仔告士打道 5 號

稅務大樓 33 樓

電郵：qla_consultation@epd.gov.hk

Environmental Protection Department, Hong Kong SAR Government

33rd Floor, Revenue Tower,

5 Gloucester Road, Wan Chai, Hong Kong

E-mail: qla_consultation@epd.gov.hk

澳門特別行政區政府運輸工務司/環境保護局

澳門宋玉生廣場 393 至 437 號

皇朝廣場十樓

電郵：info@dspa.gov.mo

The Secretariat for Transport and Public Works/Environmental Protection Bureau, the
Government of the Macao Special Administrative Region

Direcção dos Serviços de Protecção Ambiental -Ala. Dr. Carlos D'Assumpção

Nos 393 a 437, Edif. Dynasty Plaza, 10º andar, Macau

E-mail: info@dspa.gov.mo

香港觀鳥會對《共建優質生活圈專項規劃》的意見

Hong Kong Bird Watching Society's comments on "Regional Cooperation Plan on Building a Quality Living Area"

香港觀鳥會（下稱本會）是一個公共性質的慈善機構，本會的工作包括進行鳥類調查及研究、管理本地重要鳥類生境及協助中國大陸觀鳥事業發展等。本會亦關注保育香港以至中國大陸的鳥類及其自然生態。

Hong Kong Bird Watching Society (HKBWS) is an Approved Charitable Institution of Public Character in Hong Kong. Our main duties includes conducting bird surveys and researches, managing important bird habitats and helping the establishment and development of birdwatching activities in mainland China. HKBWS is also concerned about birds and their habitats in Hong Kong as well as in mainland China.

本會歡迎《共建優質生活圈專項規劃》（《專項規劃》）提出的目標和方向，本會相信是次規劃能令粵港澳三地的環境保護工作向前邁進。

HKBWS welcomes the visions and directions suggested by the "Regional Cooperation Plan on Building a Quality Living Area" ("the Study"). We believe that the study is an important step in regional co-operation in Environmental Protection.

本會對《專項規劃》有以下意見及建議：

HKBWS has the following comments and suggestions on the Study:

1. 理念和方向 Vision and Directions of the Study

1.1. 本會歡迎《專項規劃》改善區內生活質素的理念和方向。本會認為改善區內的生物多樣性及維持健全生態系統，可以提供康樂資源、改善人民心理質素，亦能提供控制泛濫及淨化水源、泥土等生態作用，對改善生活質素有莫大幫助。

HKBWS welcomes the objectives of the study to improve living quality in the area. By improving the biodiversity and maintaining a healthy ecosystem, living quality could be improved as they can provide resources for recreation and improve mental health of people, at the same time providing ecological services such as flood control and clean water and soil.

- 1.2. 《專項規劃》當中的建議可能存在矛盾，例如發展運輸系統或其他基建可能損失生態環境或增加污染。當局應利用適當機制處理這些矛盾，例如策略性環評等。

Some suggestions of the study may conflict with each other, for example, the construction of transport systems or other infrastructures may lead to loss of habitats and increased pollution. These conflicts should be dealt with suitable mechanisms such as strategic environmental impact assessment.

2. 生態保育合作 **Co-operation in Biodiversity Conservation**

- 2.1. 本會歡迎《專項規劃》建議就深圳梧桐山國家級森林公園 – 香港紅花嶺的保育合作，希望當局盡快落實將香港紅花嶺劃入郊野公園範圍，並且邀請兩地學者及公眾團體參與研究、保育及管理工作；

HKBWS welcomes the proposal of ecological conservation collaboration between Shenzhen Wutong Shan National Forest Park and Robin's Nest¹. We urge the authority to include Robin's Nest as Country Park as soon as possible. We believe that academics and non-government organizations from the two cities could contribute to studies, conservation and management of these areas and we hope that the authority could invites these bodies in the future plans;

- 2.2. 民間團體透過搜集資料、推廣教育等工作等方式進行保育行動，是促進區內保育工作的重要角色。本會在國內推動各地觀鳥會的成立，進行各種研究及教育工作，可以作為一個參考，希望當局積極支持類似工作。

NGOs actively promote conservation work by ways such as collecting data and education. They act as an important role in regional conservation. For example, the HKBWS supports establishment of bird watching societies in different mainland cities and conducts various research and education work in the mainland. This could be a good example and we the governments could support similar works in the region.

- 2.3. 本會希望藉保育梧桐山-紅花嶺得到的經驗，將類似工作延伸至廣東省其他森林、山區地帶，進一步加強區內的生態聯繫，將區內的生態熱點及生態系統與重要生態腹地（如南嶺國家公園）連接起來。

We believe that the experience learned from the collaboration between Shenzhen Wutong Shan National Forest Park and Robin's Nest could provide valuable experiences facilitating the development and publication of similar plans between forested areas within the Guangdong Province and thus

¹ P.18, III(A)1(b)(i)

enhancing the regional biodiversity and ecological connection by connecting ecological hotspots and ecosystems with key hinterland areas (e.g. Nanling National Park).

- 2.4. 《專項規劃》提出要建設綠道網絡，本會擔憂一些以康樂為目的的綠道並不能提供生態聯繫，反而有機會破壞原有環境。若要建立真正的生態聯繫，需要詳細的生態研究，同時避免引入人為干擾。

The Study suggests the construction of greenway network. HKBWS is concerned that greenways aiming for recreational use would not necessarily provide ecological connection. In construction of a real ecological corridor, detailed study should be undertaken and human disturbance should be avoided.

- 2.5. 本會支持深圳福田國家級自然保護區及香港米埔內海后灣拉姆薩爾濕地的共同合作，改善后海灣的水質尤其重要。米埔自然保護區受到沉積速度加快的威脅，雙方政府在深圳灣一帶進行填海時，應透過環境影響評估考慮對該區水文、沉積的影響。

HKBWS supports the cooperation between Futian National Nature Reserve in Shenzhen – Mai Po Inner Deep Bay Ramsar Site in Hong Kong². Improving the water quality in Deep Bay is one of the priority tasks. Bearing in mind the great threat posed by rapid sedimentation to Mai Po Marshes Nature Reserve, the governments should require the impacts on hydrology and sedimentation of any future reclamation works around the Deep Bay area to be considered in environmental impact assessments

- 2.6. 《專項規劃》提出要積極申請將福田自然保護區擴大及申請為國際重要濕地，本會十分支持，同時希望當局小心規劃福田附近的土地用途，以免福田自然保護區受到負面影響。在管理區內紅樹林濕地時應特別留意避免種植外來品種紅樹，亦需控制已建立的外來紅樹品種種群，以免對本地原生物種造成影響。

HKBWS supports the intention to expand Futian Nature Reserve and apply for listing of the wetlands as “Wetland of International Importance”. We hope that the Shenzhen Government should plan land uses in Futian carefully to avoid negative impacts on the Nature Reserve. Planting of exotic mangroves should be avoided as far as possible and management (clearance) of established exotic mangrove populations should be actively conducted, in order to protect native biodiversity.

² P.20, III(A)1(b)(ii)

- 2.7. 本會十分支持《專項規劃》提出改善大鵬灣水質及保護大鵬灣一帶環境的建議³。該區有多個擁有高生態價值的地區，應避免進行一些不適當的發展
- HKBWS strongly supports the intention to protect water quality and surrounding environment of the Mirs Bay Area. Unfavourable developments should be avoided in order to protect the many ecologically sensitive sites in the area.
- 2.8. 要達到《專項規劃》的目標，當局應增撥資源予各部門，支持相關的工作。
- Sufficient resources should be allocated in order to fulfill the objectives of the study.

3. 農業發展及生態保育 **Agricultural development and biodiversity conservation**

- 3.1. 《專項規劃》提出加強高生態價值地區（包括農地）的保護，本會非常支持。本會十分歡迎《專項規劃》(二)(1)(iv)提出「引導珠三角內地方政府將自然資源保護納入土地徵用和儲備的目標，增加對徵用土地作為自然景觀用途，包括作為農業發展用途的資源支持。」本會希望香港政府亦應積極考慮《專項規劃》此項建議，解決私人土地的保育爭議，同時保障本土農業及農地生態。

The suggestion of strengthening protection of areas of high ecological value including agricultural lands⁴ is strongly supported and welcomed.

HKBWS welcomes the suggestion of the study to “encourage administrations at the local level to undertake land resumption for the purpose of protecting natural resources and landscapes as well as supporting agricultural development”⁵. We hopes the HKSAR government to actively consider such suggestion of the Study, in order to solve nature conservation disputes on private land as well as conserving local agricultural production and dependent wildlife.

- 3.2. 本會支持《專項規劃》建議投放資源農業生產，除了減低食品運輸的碳排放外，亦對保育鄉郊環境、維持陸上生態聯繫及保育農地生物物種有莫大幫助，希望香港政府亦跟從類似方向。

HKBWS welcomes the intention of the Study to support agricultural development⁵ as this would facilitate conservation of rural environment, farmland-dependant species and ecological linkages in addition to reducing

³ P.25, III(A)2(c)(ii)

⁴ P.6, II(A)(i)

⁵ P.8, II(B)1(iv)

carbon emissions in transportation of food. We hope the HKSAR government could adopt similar strategies.

4. 落馬洲河套地區 Development of Lok Ma Chau Loop

4.1. 本會重申落馬洲河套地區應留作濕地保育用途。當局最近期提出的發展計劃高度與密度過高，與週邊的生態易受影響地區或后海灣濕地皆不相容，亦與《專項規劃》提出要加強生態聯繫、保育重要濕地的理念背道而馳。落馬洲河套地區原為濕地，因為先前的河道改善工程而受到破壞，《專項規劃》(四)(a)(i)點指出要「加強生態基礎設施建設，對受到人工破壞的自然生境開展生態修復」。落馬洲河套地區亦是位於《專項規劃》「大珠三角區域生態安全格局概念圖」(圖 3-1) 的其中一條主要生態連接上。本會希望當局應參考《專項規劃》中對自然保育的理念，審慎考慮落馬洲河套地區的發展方向。

HKBWS reiterates that Lok Ma Chau Loop should be reserved for wetland conservation purposes. The height and density of most recent plan put forward by the government is too high and is not compatible either with the surrounding ecologically sensitive areas or any other part of the Deep Bay Wetlands. It is also running in the opposite direction to the visions of the current Study to enhance ecological linkages and conserve important wetlands. The Loop was originally wetlands destroyed in previous river training works and the study suggests “strengthening ecological enhancement measures and restoration works for compensating the natural habitats damaged by human activities”⁶. The Lok Ma Chau Loop is also on one of the main ecological linkage indicated in the Study⁷. The authority should follow the visions in nature conservation stated in the current Study when determining the land-use of the Lok Ma Chau Loop.

本會謹此希望《專項規劃》編制組及各地相關部門詳閱及採納以上意見。
HKBWS hopes that our comments could be seriously considered by the working group of the Study as well as concerning departments in the region.

香港觀鳥會自然保育主任

鄭諾銘

Cheng Nok Ming

Conservation Officer, Hong Kong Bird Watching Society

⁶ P.53, (D)(a)(i) of the study

⁷ P.18, Figure 3-1

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香港特別行政區政府發展局 Development Bureau, HKSAR Government

香港特別行政區漁農自然護理署 Agricultural, Fisheries and Conservation Department, HKSAR Government

香港特別行政區地土木工程拓展署 Civil Engineering and Development Department, HKSAR Government

香港特別行政區地政署 Lands Department, HKSAR Government

香港特別行政區規劃署 Planning Department, HKSAR Government