



**HONG KONG
GOLF CLUB**

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Representation in respect of The Draft Fanling/Sheung Shui Extension Area OZP No. S/FSSE/1

June 2023

摘要

SUMMARY

摘要：水松

A summary on Chinese Swamp Cypress

粉嶺球場的水松林擁有全球超過 15% 的水松，同時是目前世上少數具繁殖能力的種群。

The Fanling Chinese Swamp Cypress stand accounts for >15% of the global population of the species and is possibly the only population that produces viable seeds.

水松為濕地植物，容易受水文改變影響。

The species is highly susceptible to hydrological changes.

政府的環評報告未有周詳地評估可能出現的水文影響。

Hydrological impacts have not been properly assessed in the EIA.

環評報告未有採納進行評估當時可得的最佳及最新資料。

'Best and latest information available' has not been used in the EIA.

我們應盡力保護粉嶺高爾夫球場的水松林。因為有關的水文影響難以測定時，須採用預防的原則，比可以肯定的影響時更為謹慎處理。

It deserves the highest possible protection and is a rare instance where the precautionary principal should be applied.

任何可能影響水松林水文狀況的行動，即使風險為低水平，亦不應容許。

Any action which runs even the slightest risk of changes to the hydrology of the Swampy Woodland should not be permitted.



摘要：蝙蝠

A summary on Bats

粉嶺高爾夫球場為香港已知蝙蝠多樣性最高的地點之一。
FGC is one of the best sites in Hong Kong for Bat Diversity

蝙蝠是良好的指標物種，是生態系統的健康指標。
Bats are excellent ecological indicators and demonstrate the health of the site

球場是獨特的地景（棲息地鑲嵌體）
Important lowland landscape (habitat mosaic) – unique in a HK context

多樣化的生境之間互相形成界面，為佔據不同生態位的蝙蝠（及其獵物）提供合適的環境。
Interface habitats abound to create a wide variety of niches to support a wide range of bat (edge) species and their food prey.

政府的環評報告未有採納進行評估當時可得的最佳及最新資料。
'Best and latest information available' has not been used in the EIA.

環評報告未有為對蝙蝠的潛在影響提出有效的緩解措施。
Absence of mitigation measures for bats



摘要：飛蛾

A summary on Moths

粉嶺球場的蛾類多樣性相當高（佔香港已知物種 > 27%）。
Diversity of moths is high in FGC (>27% of known species in HK).

根據球會以往調查的統計數據，相信已紀錄的物種佔整個球場所有物種少於一半。環評報告僅錄得 59 種，反映其結果欠缺代表性。

The log-normal distribution of data obtained from previous surveys suggests that less than half the species of FGC have been recorded so far. This would indicate the findings from the EIA Report, in which only 59 species was recorded, are not representative.

環評報告的文獻回顧不足，蛾類調查的方法亦存在錯誤或缺憾。
Lack of literature review and flawed survey methods in the EIA

粉嶺球場的蛾類分佈不平均，不同的區域錄得顯著不同的群落。分區 1 錄得的 261 種蛾類當中，有高達 82 種未曾在其他分區錄得。

Species are not distributed evenly throughout FGC. At the four Sub-Areas, different species assemblages were found. For instance, among the 261 species recorded in Sub-Area 1, up to 82 were not recorded elsewhere in the Project Site.

環評報告沒有仔細評估光污染的潛在生態影響，亦未有作出任何量化或估算。
The potential impacts of light pollution has been glossed over in the EIA. There was no attempt made to quantify or measure the potential impacts.

不少受影響的蛾類，包括具保育價值的物種，其生態習性仍然未明，令潛在的影響難以測定，因此應採用預防的原則。

It is an instance where the precautionary principal should be applied.



摘要：項目地點的物種多樣性

A summary on species diversity at the Project Site

Taxa	哺乳動物 Mammal			鳥類 Bird			爬行類 Reptile			兩棲類 Amphibian			蝴蝶 Butterfly			蛾 Moth			蜻蜓 Dragonfly			魚類及水生無脊椎動物 Fish & Aquatic Invertebrates		
	FGC	PS	SA1	FGC	PS	SA1	FGC	PS	SA1	FGC	PS	SA1	FGC	PS	SA1	FGC	PS	SA1	FGC	PS	SA1	FGC	PS	SA1
Total no. of species recorded	32	21	18	182	84	65	23	11	5	11	9	4	118	45	27	729	612	264	40	25	5	42	17	0
	/	65.6%	56.3%	/	46.2%	35.7%	/	47.8%	21.7%	/	81.8%	36.4%	/	38.1%	22.9%	/	84.0%	36.2%	/	62.5%	12.5%	/	40.5%	0%
Total no. of species with conservation importance	25	17	15	73	26	18	14	5	3	2	1	0	11	2	1	107	62	44	3	2	1	3	3	0
	/	68.0%	60.0%	/	35.6%	24.7%	/	35.7%	21.4%	/	50.0%	0%	/	18.2%	9.1%	/	57.9%	41.1%	/	66.7%	33.3%	/	100%	0%

粉嶺哥爾夫球場 FGC: 172 ha

項目地點 Project Site: 32 ha (18.6%)

分區1 Sub-Area 1: 11ha (6.4%)

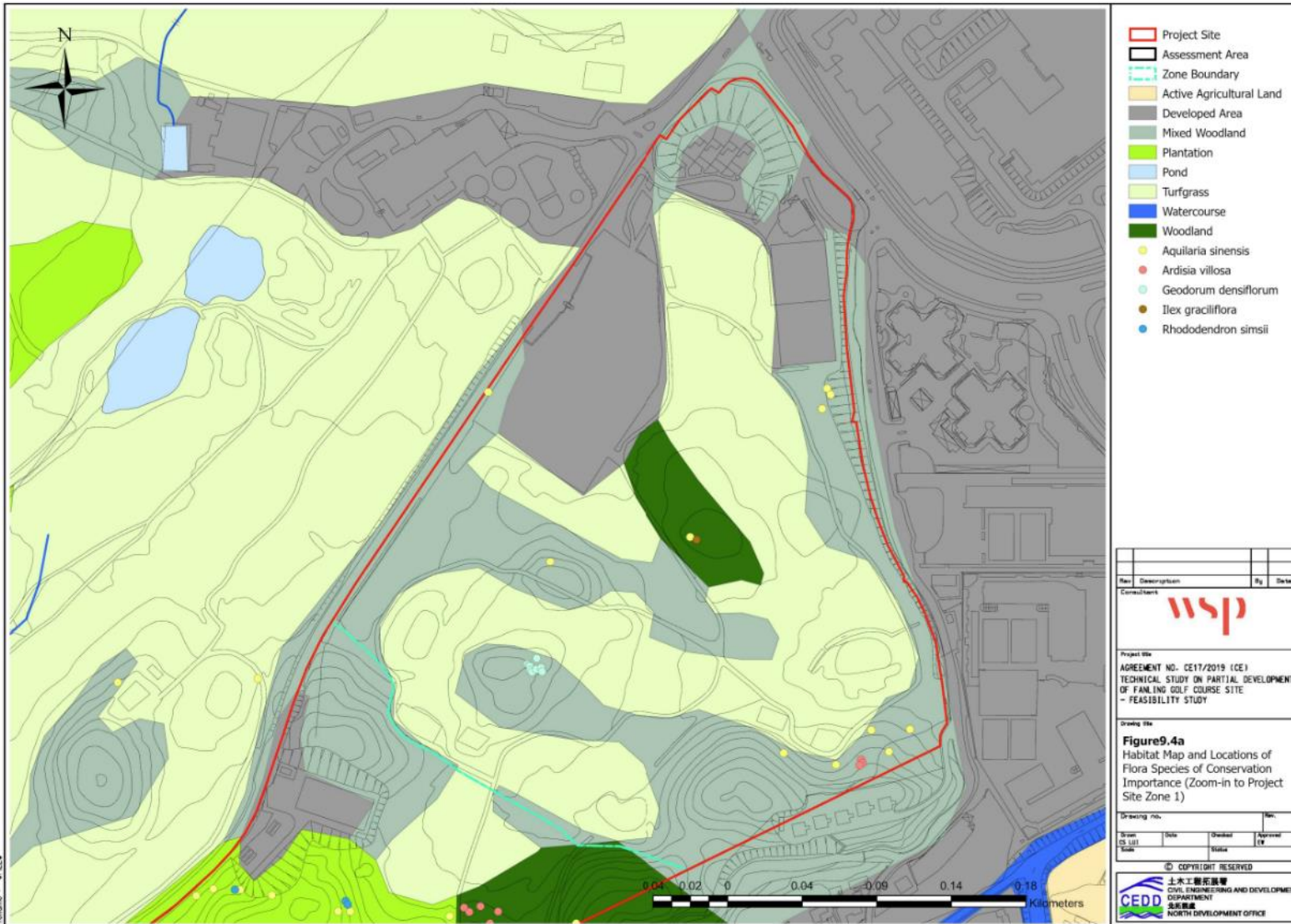
摘要：項目地點的物種多樣性

A summary on species diversity at the Project Site

類群 Taxa	具保育價値物種數量 (分區1) No. of species of conservation importance (SA1)
哺乳動物 Mammal	15
鳥類 Bird	18
爬行類 Reptile	3
蝴蝶 Butterfly	1
蛾 Moth	44
蜻蜓 Dragonfly	1
總數 Total	82

摘要：項目地點的物種多樣性

A summary on species diversity at the Project Site



生境 Habitat	面積(公頃) Area (ha)	所佔百分比 Percentage Cover
草坪地 Turfgrass	5.07	46.1%
混合林地 Mixed Woodland	3.72	33.8%
林地 Woodland	0.39	3.5%
已發展區域 Developed Area	1.82	16.5%
總數 Total	11	



生態評估

ECOLOGICAL EVALUATION

如何評價某生境的重要性？

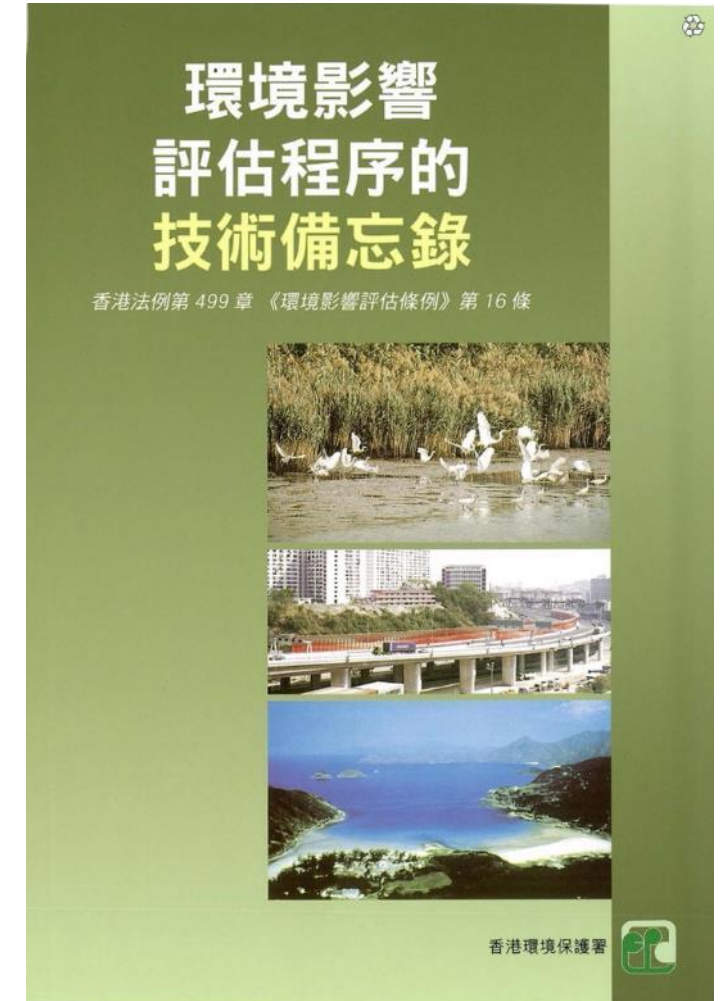
How to evaluate the value of a habitat?

「生態影響」指生境或物種由於工程項目所帶來的直接或間接環境改變而受的影響。生態影響的重大程度，除與其大小和規模有關外，亦與受影響的生境或物種的重要性有關。一般來說，重要生境或物種所受的影響較為重大。

在環境影響評估程序中，用以評價某一個生境的生態重要性的一般準則載列於**環評技術備忘錄附件8的表(2)**。

‘Ecological impact’ refers to the effect on a habitat or species due to direct or indirect changes in the environment brought about by a project. Besides magnitude and scale, the significance of an ecological impact is also related to the asserted importance of the habitat or species to be affected. In general, the impact on an important habitat or species will be more significant.

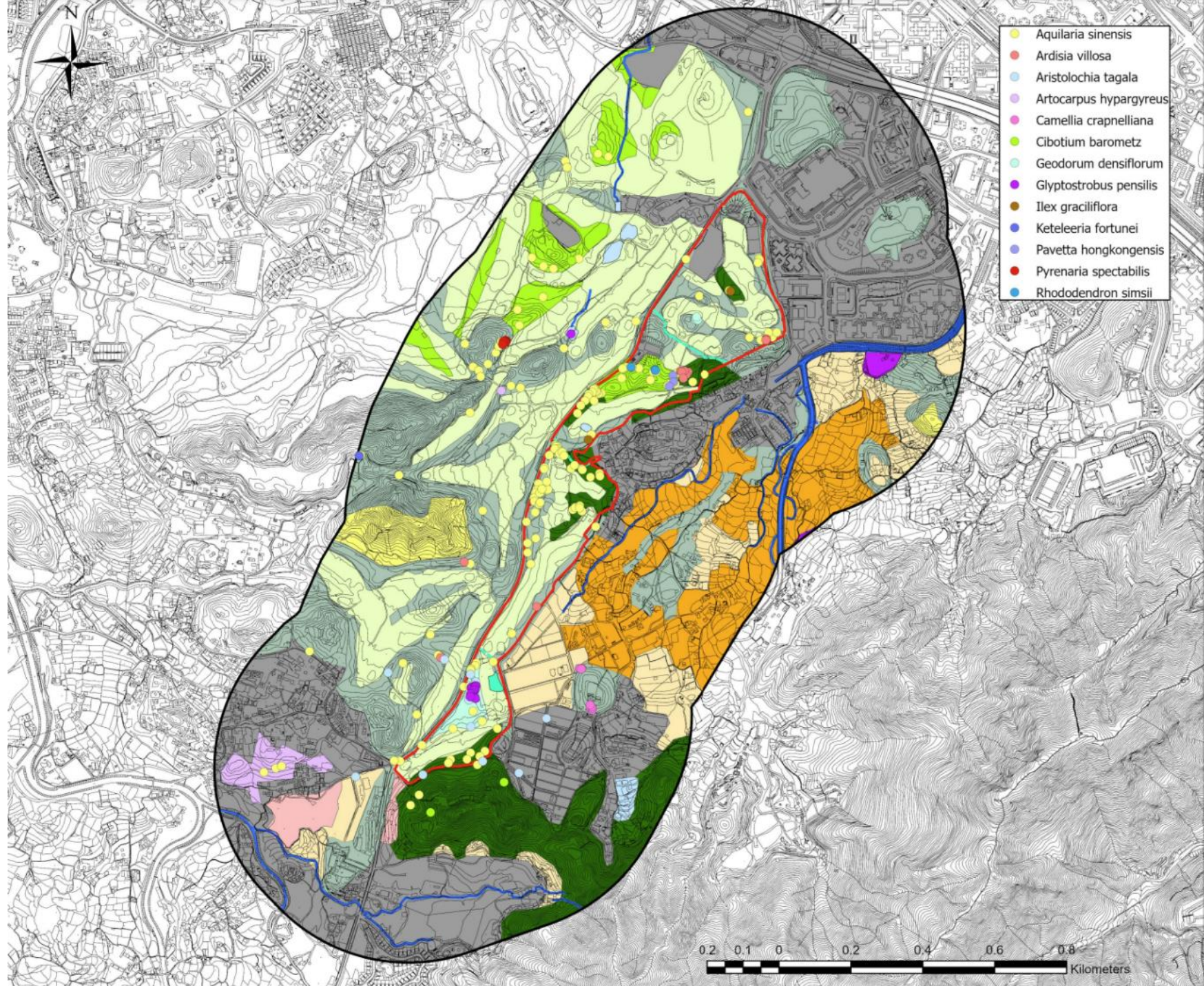
The accepted criteria to be used under the EIA process for evaluation of the ecological importance of a habitat are listed in **Table 2 of Annex 8 of the EIAO Technical Memorandum**.





如何評價某生境的重要性？

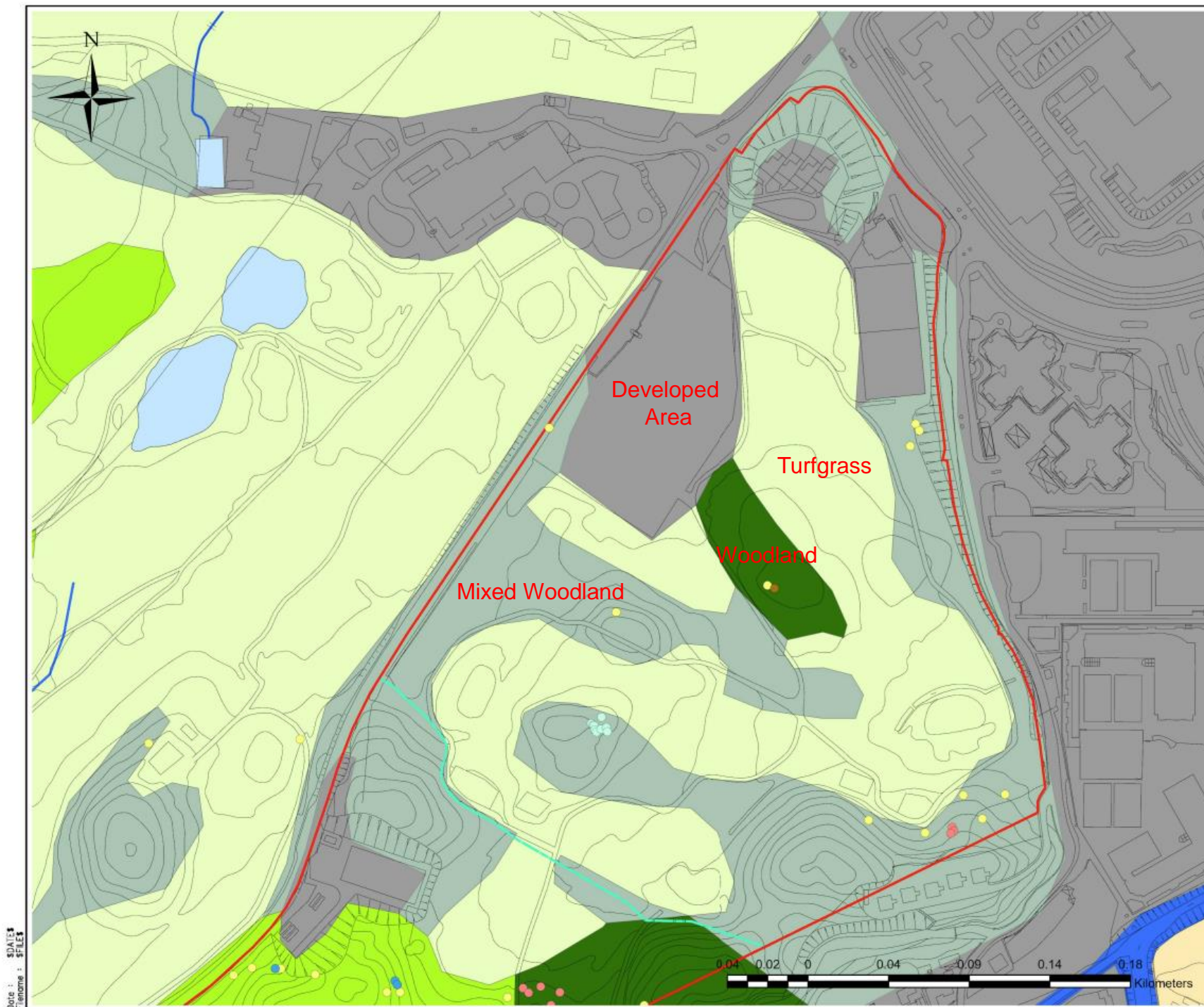
How to evaluate the value of a habitat?

準則 Criteria	備註 Remarks
天然性 Naturalness	真正的天然生境（即未經人為改造）通常極為珍貴，但本港大部分地區均經改造。一般來說，經 較少人為改造 的生境通常較具價值。 Truly natural habitats (i.e. not modified by man) are usually highly valued. However, most areas of the territory have been modified. Generally, those habitats less modified will tend to be rated higher.
生境面積的大小 Size	一般來說，倘其他條件相同， 面積較大 的生境比面積較小者更有價值。 In general larger area of habitat(s) shall be more valuable than smaller ones, all else being equal.
多樣化 Diversity	地方內的物種群聚及群落越 多樣化 ，其存護價值便越高。 The more diverse the species assemblages and communities of a site, the higher is its conservation value.
稀有程度 Rarity	稀有程度 適用於生境與物種 。具有一個或多個 稀有物種及生境 的地點，比沒有稀有物種及生境的地點更有價值。 Rarity can apply to habitats as well as species. The presence of one or more rare habitats and species will give a site higher value than those without rarity.
再造性 Re-creatability	難以天然再造或人為再造 的生境，通常較具價值。 Habitats which are difficult to be re-created naturally or artificially are usually valued higher.
零碎性 Fragmentation	一般而言， 生境越零碎 ，其價值越低。 In general, the more fragmented habitat, the lower is its value.
生態連繫 Ecological Linkage	倘 接近及 / 或與任何種類具高價值的生境在功能上有連繫 ，有關生境將更具價值。 The value of a habitat increases if it lies in close proximity and/or links functionally to a highly valued habitat of any type.
潛在價值 Potential Value	某些地方經 適當管理或自然過程 ，可能會最終發展成遠較目前更具自然存護價值的方面。應注意限制取得此等潛在價值的因素。 Certain sites, through appropriate management or natural processes, may eventually develop a nature conservation interest substantially greater than that existing at present. Factors limiting such potential being achieved shall be noted.
育哺場 / 繁育場 Nursery / Breeding Ground	此等地區對許多生物及其 種群的再生和長期存活 十分重要。 Such areas are very important for the regeneration and long term survival of many organisms and their populations.
久遠程度 Age	久遠的天然或半天然生境通常較為珍貴。某些生境如林地， 年代久遠 的通常比較新近的更具價值得多。 Ancient natural or semi-natural habitats are normally highly valued. For some habitats such as woodlands, older ones are normally valued much higher than recent ones.
野生生物的數量 / 豐盛程度 Abundance / Richness of Wildlife	一般而言，有 較多野生生物 賴以維生的地方，其價值較高。 In general sites supporting more wildlife will be rated higher.



Rev.	Description	By	Date
Consultant			
			
Project Site			
AGREEMENT NO. CE17/2019 (CE) TECHNICAL STUDY ON PARTIAL DEVELOPMENT OF FANLING GOLF COURSE SITE - FEASIBILITY STUDY			
Drawing Site			
Figure 9.4 Habitat Map and Locations of Flora Species of Conservation Importance			
Drawing no.		Rev.	
Drawn CS LUI	Date	Checked	Approved
Scale		Status	EW
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- Project Site
- Assessment Area
- Zone Boundary
- Active Agricultural Land
- Developed Area
- Mixed Woodland
- Plantation
- Pond
- Turfgrass
- Watercourse
- Woodland
- Aquilaria sinensis
- Ardisia villosa
- Geodorum densiflorum
- Ilex graciliflora
- Rhododendron simsii

<small>Rev.</small>	<small>Description</small>
	<small>Bg.</small>
	<small>Date</small>
<small>Consultant</small>	
<small>Project title</small>	
AGREEMENT NO. CE17/2019 (CE) TECHNICAL STUDY ON PARTIAL DEVELOPMENT OF FAN LING GOLF COURSE SITE - FEASIBILITY STUDY	
<small>Drawing title</small>	
Figure 9.4a Habitat Map and Locations of Flora Species of Conservation Importance (Zoom-in to Project Site Zone 1)	
<small>Drawing no.</small>	<small>Rev.</small>
<small>Drawn</small>	<small>Date</small>
<small>CS LUJ</small>	<small>Checked</small>
<small>Scale</small>	<small>Status</small>
	<small>Approved</small>
	<small>EP</small>
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項目地點中的草坪地

Turfgrass Land within the Project Site

準則 Criteria	環評報告的原文 Extract from the Approved EIA Report	意見 Comments
天然性 Naturalness	Man-made habitat	<ul style="list-style-type: none"> Failed to consider the eco-friendly management approach; man-made habitats are not necessarily of low value.
生境面積的大小 Size	49.36 ha	<ul style="list-style-type: none"> No elaboration on how this affects the evaluation
多樣化 Diversity	Low diversity of flora, low to moderate diversity of fauna	<ul style="list-style-type: none"> Diversity of bats and moths severely under-recorded
稀有程度 Rarity	2 flora species of conservation importance: <i>Aquilaria sinensis</i> and <i>Glyptostrobus pensilis</i> ; 16 fauna species of conservation importance: Chinese Pond Heron, Eastern Cattle Egret, Little Egret, Crested Serpent Eagle, Black Kite, Eastern Buzzard, Ryukyu Scops-owl, Collared Crow, Chinese Hwamei, Metallic Cerulean, Common Cerulean, Common Rose, Common Birdwing, Scarlet Basker, Common Rat Snake, Pallas's Squirrel	<ul style="list-style-type: none"> Failed to consider the rarity of habitat itself; turf maintained and managed in an eco-friendly approach is not common in Hong Kong. Under-recording of the bat and moth species present
再造性 Re-creatability	Easy to re-create	/
零碎性 Fragmentation	Occurs extensively within Fanling Golf Course	/
生態連繫 Ecological Linkage	Not functionally linked to habitats of conservation importance	<ul style="list-style-type: none"> The turf is ecologically (and hydrologically) linked with adjacent habitats including woodland, plantation, ponds, marsh, swampy woodland. The open turf also form a mosaic with the adjacent wooded areas. Between the two, there are no major physical barriers, and wildlife have been sighted to move freely between these habitats.
潛在價值 Potential Value	Low	<ul style="list-style-type: none"> Could further attract wildlife use as eco-friendly management practices are in place.
育哺場 / 繁育場 Nursery / Breeding Ground	No significant record	/
久遠程度 Age	N/A	/
野生生物的數量 / 豐盛程度 Abundance / Richness of Wildlife	Low to moderate abundance of bird and butterfly; low abundance of odonate, herpetofauna and mammal	<ul style="list-style-type: none"> Abundance of bats severely under-recorded; abundance of moths not considered
整體生態價值 Overall Ecological Value	Low , as most of the recorded species associated to other habitats	<ul style="list-style-type: none"> Should be “Medium” given the habitat's uniqueness, its large size, and the wildlife diversity and abundance (in particular bats). In the EIA Report, there is no substantiation on the claim that the species recorded were associated to other habitats.



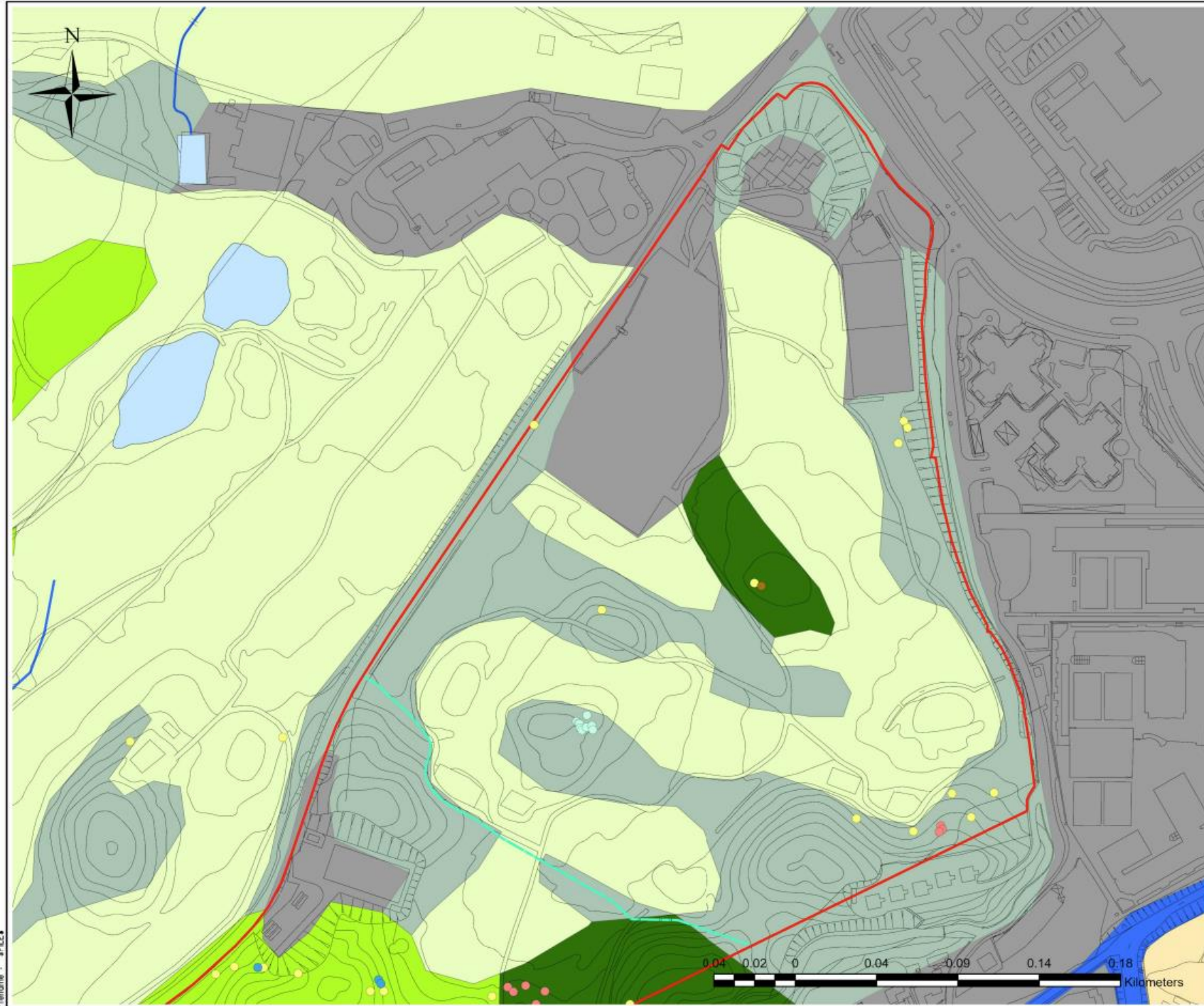




項目地點中的混合林地

Mixed Woodland within the Project Site

準則 Criteria	環評報告的原文 Extract from the Approved EIA Report	意見 Comments
天然性 Naturalness	Semi-natural habitat	<ul style="list-style-type: none"> The presence of <i>Ardisia villosa</i> (雲下紅) and other native flora species that are rarely planted indicates the remnant nature of these woodlands.
生境面積的大小 Size	7.69 ha	<ul style="list-style-type: none"> No elaboration on how this affects the evaluation.
多樣化 Diversity	Low to moderate diversity of flora; moderate diversity of fauna	<ul style="list-style-type: none"> Diversity of bats and moths severely under-recorded
稀有程度 Rarity	4 flora species of conservation importance: <i>Aquilaria sinensis</i> , <i>Ardisia villosa</i> , <i>Ilex graciliflora</i> , and <i>Geodorum densiflorum</i> ; 11 fauna species of conservation importance: Crested Goshawk, Common Emerald Dove, Rufous-capped Babbler, Metallic Cerulean, Danaid Eggfly, Common Rose, Common Birdwing, Many-banded Krait, Japanese Pipistrelle, Masked Palm Civet, <i>Cerynea discontenta</i>	<ul style="list-style-type: none"> Failed to consider the rarity of the habitat itself; also under-recorded the bat and moth species of conservation importance present.
再造性 Re-creatability	Can be re-created	<ul style="list-style-type: none"> Failed to consider time needed for woodland to establish and mature. Also, some trees are of notably old age (Jim <i>et al.</i> 2020) and are impossible to be replaced.
零碎性 Fragmentation	Isolated in patches	<ul style="list-style-type: none"> Well linked with adjacent woodland/plantation to form larger, continuous wooded areas; also forms a mosaic with adjacent turf. Between the wooded area and turf there are no physical barriers, and wildlife have been sighted to move freely between these habitats. Therefore, there is no major fragmentation.
生態連繫 Ecological Linkage	Connecting adjacent woodland	<ul style="list-style-type: none"> Appears to be contradictory to the above point
潛在價值 Potential Value	Low	<ul style="list-style-type: none"> Underestimated, since it could further attract wildlife use as eco-friendly management practices (such as enrichment planting) are in place
育哺場 / 繁育場 Nursery / Breeding Ground	No significant record	<ul style="list-style-type: none"> Potentially nesting ground for birds and nursery for Short-nosed Fruit Bats
久遠程度 Age	Not applicable	<ul style="list-style-type: none"> Misleading - at least 40-50 years judging from aerial photographs; some trees are significantly older with estimated age ranging 70 to ~200 years (Jim <i>et al.</i> 2020)
野生生物的數量 / 豐盛程度 Abundance / Richness of Wildlife	Moderate abundance of bird and butterfly; low to moderate abundance of odonate, herpetofauna and mammal	<ul style="list-style-type: none"> Abundance of bats severely under-recorded; abundance of moths not considered
整體生態價值 Overall Ecological Value	Low to medium	<ul style="list-style-type: none"> Should be “Medium” given the age and presence of various species of conservation importance, in particular the very rare <i>Ardisia villosa</i>



- Project Site
- Assessment Area
- Zone Boundary
- Active Agricultural Land
- Developed Area
- Mixed Woodland
- Plantation
- Pond
- Turfgrass
- Watercourse
- Woodland
- Aquilaria sinensis*
- Ardisia villosa*
- Geodorum densiflorum*
- Ilex graciliflora*
- Rhododendron simsii*

Rev	Description
By	Date
Consultant	
wsp	
Project Site	
AGREEMENT NO. CE17/2019 (CE)	
TECHNICAL STUDY ON PARTIAL DEVELOPMENT	
OF FAN LING GOLF COURSE SITE	
- FEASIBILITY STUDY	
Drawing Site	
Figure9.4a	
Habitat Map and Locations of	
Flora Species of Conservation	
Importance (Zoom-in to Project	
Site Zone 1)	
Drawing no.	Rev.
Drawn CS LUI	Date
Checked EW	Status
Scale	Date

Isolated?

Sub-Area 2

Sub-Area 1

Google

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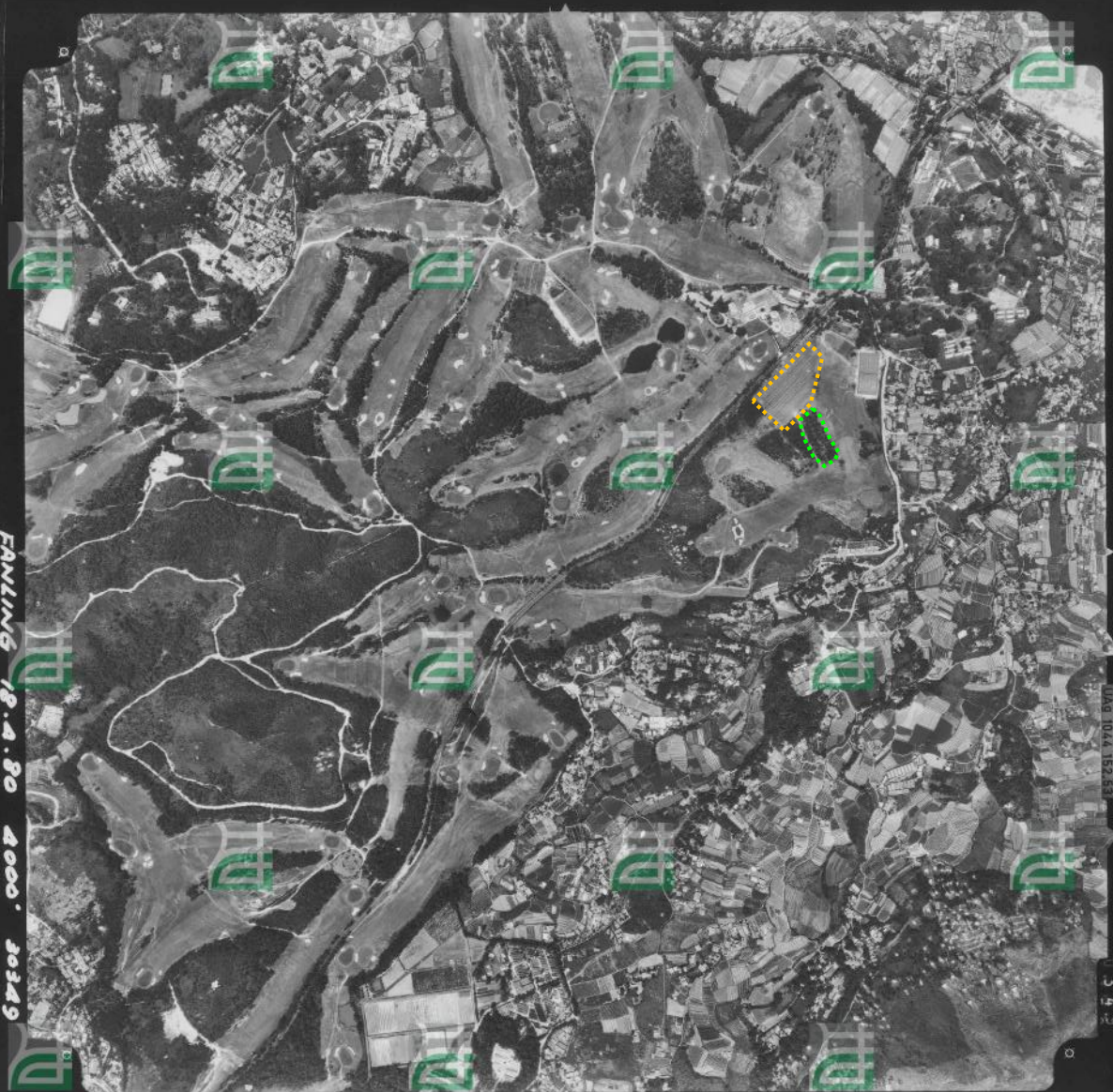
O.N.E. living heritage

項目地點中的林地

Woodland within the Project Site

準則 Criteria	環評報告的原文 Extract from the Approved EIA Report	意見 Comments
天然性 Naturalness	Largely natural	-
生境面積的大小 Size	4.07 ha	No elaboration on how this affects the evaluation. According to the EIAO-TM, mature native woodland larger than one hectare should be considered as an important habitat
多樣化 Diversity	Low to moderate diversity of flora; moderate diversity of fauna	Diversity of bats and moths severely under-recorded
稀有程度 Rarity	5 flora species of conservation importance: <i>Aquilaria sinensis</i> , <i>Aristolochia tagala</i> , <i>Cibotium barometz</i> and <i>Ilex graciliflora</i> ; 15 fauna species of conservation importance: Chinese Pond Heron, Crested Goshawk, Eastern Buzzard, Ryukyu Scops-owl, Rufous-capped Babbler, Danaid Eggfly, Common Rose, Common Birdwing, Blue Chaser, Indian Forest Skink, Red Muntjac, East Asian Porcupine, Pallas's Squirrel, Masked Palm Civet, Small Indian Civet	Failed to consider the rarity of the habitat itself; also under-recorded the bat and moth species of conservation importance present.
再造性 Re-creatability	Can be re-created	Failed to consider time needed for woodland to establish and mature. Also, some trees are of notably old age (Jim <i>et al.</i> 2020) and are impossible to be replaced.
零碎性 Fragmentation	Fragmented	Well linked with adjacent woodland/plantation to form larger, continuous wooded areas; also forms a mosaic with adjacent turf. Between the wooded area and turf there are no physical barriers, and wildlife have been sighted to move freely between these habitats. Therefore, there is no major fragmentation.
生態連繫 Ecological Linkage	Connected by Mixed Woodland and Plantation within the Project Site; occurs as a large single stand in the southern part within the assessment area	Appears to be contradictory to the above point
潛在價值 Potential Value	Low to moderate	Underestimated, since it could further attract wildlife use as eco-friendly management practices (such as enrichment planting) are in place
育哺場 / 繁育場 Nursery / Breeding Ground	No significant record	Potentially nesting ground for birds and nursery for Short-nosed Fruit Bats
久遠程度 Age	At least 20 years	Misleading – over 40 years old judging from historic aerial photographs; some trees are of old age (e.g. yellow cow wood)
野生生物的數量 / 豐盛程度 Abundance / Richness of Wildlife	Moderate abundance of bird and butterfly; low abundance of odonate and herpetofauna, low to moderate abundance of mammal	Abundance of bats severely under-recorded; abundance of moths not considered
整體生態價值 Overall Ecological Value	Low to medium (due to fragmentation and small size)	Should be “Medium” given the age and presence of various species of conservation importance, in particular the very rare <i>Ardisia villosa</i>

18th Apr 1980 (from HK map service, LandsD)



Present Day (Google Map)



項目地點中的沼澤林地

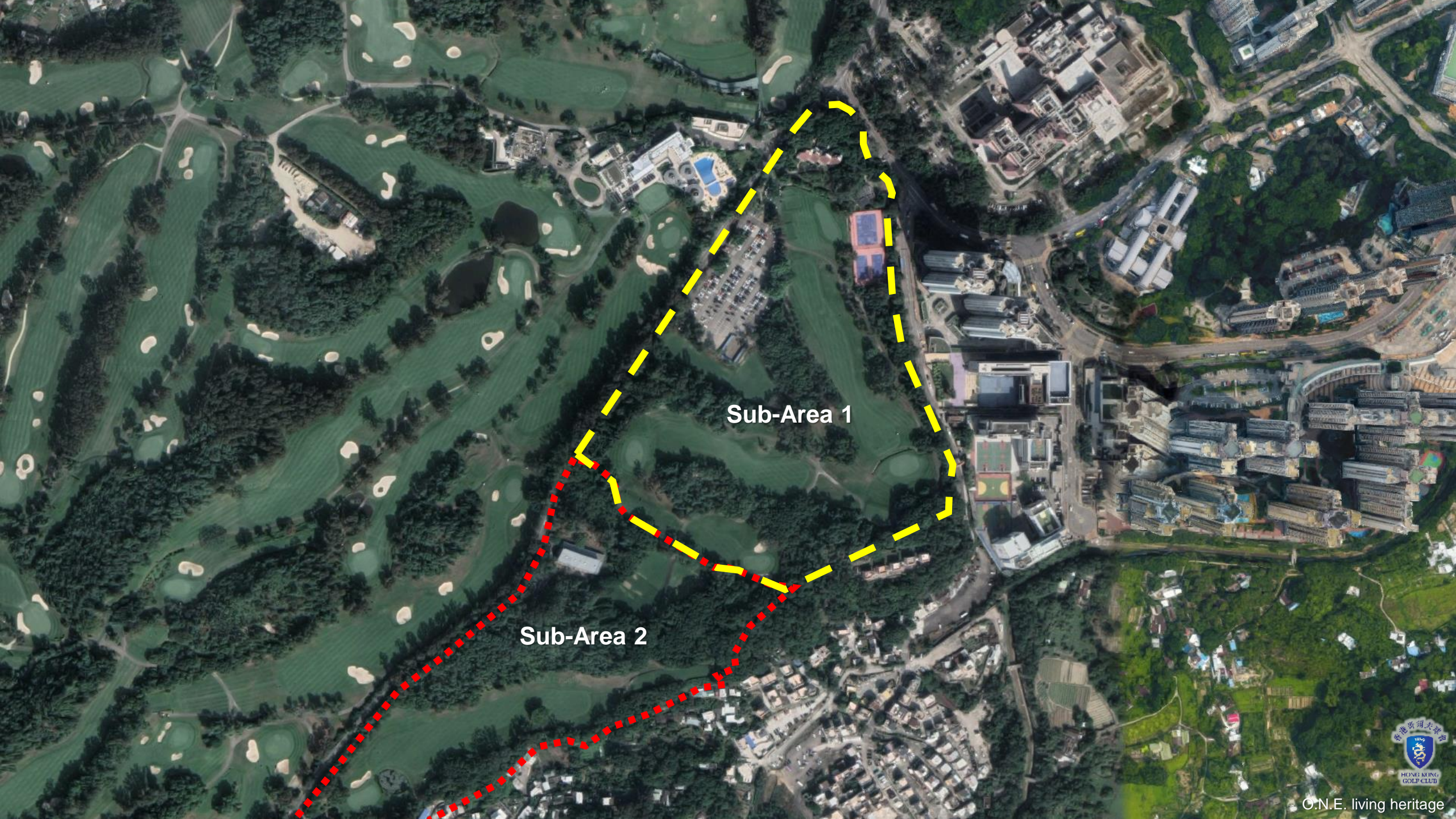
Swampy Woodland within the Project Site

準則 Criteria	環評報告的原文 Extract from the Approved EIA Report	意見 Comments
天然性 Naturalness	Largely natural	/
生境面積的大小 Size	1.4 ha	<ul style="list-style-type: none"> No elaboration on how this affects the evaluation.
多樣化 Diversity	Low diversity of flora and fauna	<ul style="list-style-type: none"> According to Zhang and Fischer (2021), the Swamp Cypress woodland in Fanling contained ~120 other native plant species (EIA only recorded 72 native and 13 exotic species)
稀有程度 Rarity	4 flora species of conservation importance: <i>Aquilaria sinensis</i> , <i>Aristolochia tagala</i> , <i>Glyptostrobus pensilis</i> , <i>Cibotium barometz</i> ; 3 fauna species of conservation importance: Rufous-capped Babbler, Forget-me-not, Common Rose	<ul style="list-style-type: none"> Failed to consider the rarity of the habitat itself. In this case, this habitat is unique in Hong Kong and rare in national and global contexts as it supports >15% of the global population of Chinese Swamp Cypress (38 mature trees plus dozens of seedlings). Chinese Swamp Cypress treated as exotic species in the EIA Under-recorded the bat and moth species of conservation importance present.
再造性 Re-creatability	Difficult to re-create	<ul style="list-style-type: none"> Arguably impossible to re-create due to age of the habitat, age of the Swamp Cypress individuals, the complex hydrology of the site (and habitat requirements of Chinese Swamp Cypress) and the lack of suitable alternative sites elsewhere.
零碎性 Fragmentation	Occurs as an isolated stand	<ul style="list-style-type: none"> Not really fragmented; while the Chinese Swamp Cypress as a species is isolated here, the stand itself is linked with other tree groups
生態連繫 Ecological Linkage	Hydrologically linked to Marsh	<ul style="list-style-type: none"> Both ecologically and hydrologically linked to the marsh, stream and turf within its catchment. (The stream was NOT identified in the approved EIA).
潛在價值 Potential Value	Moderate, given suitable hydrology	<ul style="list-style-type: none"> Potential value should be high to very high as this site is important to the survival of Chinese Swamp Cypress as a species
育哺場 / 繁育場 Nursery / Breeding ground	No significant record	<ul style="list-style-type: none"> Misleading. Considerable number of seedlings of the Swamp Cypress are present. This is highly significant as very few individuals have been known to produce viable seeds or to reproduce, and seedlings of this species have been rarely found within its global core area of occupancy (Zhang and Fischer 2021) Other fauna species of conservation importance (e.g. Common Rose, Common Birdwing, <i>S. zanklon</i>, Small Snakehead) also breed in this habitat.
久遠程度 Age	Over 100 years	<ul style="list-style-type: none"> Should be regarded as very old if not ancient in a Hong Kong's context; the oldest individual is estimated to be well over 200 years old.
野生生物的數量 / 豐盛程度 Abundance / Richness of Wildlife	Low abundance of terrestrial fauna	<ul style="list-style-type: none"> Abundance of bats and moth severely under-recorded
整體生態價值 Overall Ecological Value	Medium to high (due to high conservation importance and old age of <i>Glyptostrobus pensilis</i>)	<ul style="list-style-type: none"> Should be either “High” or “Very High” given the critically endangered status of the Chinese Swamp Cypress, the site history and the potential value

分區1的整體評估

Overall Evaluation for Sub-Area 1

準則 Criteria	環評報告的原文 Extract from the Approved EIA Report	意見 Comments
天然性 Naturalness	Although the dominant species <i>Cratogeomys cochinchinense</i> seems to be artificially planted a long time ago but also considered as natural with other native species; the mixed woodland is mixed with exotic and native plant species; while turfgrass and developed area are man-made	<ul style="list-style-type: none"> Should be considered as a whole. Sub-Area 1 is a mosaic of artificial but properly managed habitats (turf and developed area) and natural habitats (woodland and mixed woodland) with limited disturbance.
生境面積的大小 Size	Woodland: 0.39; Mixed Woodland: 3.72; Turfgrass: 5.07; Developed Area: 1.82	<ul style="list-style-type: none"> Again, no elaboration on how this affects the evaluation.
多樣化 Diversity	Low to moderate diversity of flora and low diversity of fauna	<ul style="list-style-type: none"> Diversity of bats and moths severely under-recorded
稀有程度 Rarity	4 flora species of conservation importance: <i>Aquilaria sinensis</i> (~ 38 ind.), <i>Ardisia villosa</i> (~ 25 ind.), <i>Geodorum densiflorum</i> (~32 ind.), and <i>Ilex graciliflora</i> (~1 ind.); 4 fauna species of conservation importance: Chinese Pond Heron, Crested Serpent Eagle, Japanese Pipistrelle and Scarlet Basker	<ul style="list-style-type: none"> Failed to consider the rarity of habitat; such landscape / habitat mosaic is unique in a HK's context. Under-recorded the bat and moth species of conservation importance; 82 species recorded by HK Golf Club.
再造性 Re-creatability	Woodland habitats can be recreated but take time	<ul style="list-style-type: none"> Does not fully appreciate the difficulty for recreating woodland; also failed to recognise the problem of removing old trees and compensate with young ones. Re-creating the mosaic would also be difficult but is not addressed.
零碎性 Fragmentation	The woodland is fragmented and the mixed woodland mostly formed thin belt	<ul style="list-style-type: none"> Should treat Sub-Area 1 as a whole; the area adjoins Sub-Area 2 and there is good linkage between the two area.
生態連繫 Ecological Linkage	Only the southern end functionally linked to habitats of Sub-Area 2	<ul style="list-style-type: none"> This claim is unsubstantiated. The fairways forms a continues corridor from hole #1 to #3 (i.e. across the entire Sub-Area 1), and extend well into Sub-Area 2.
潛在價值 Potential Value	Low, due to surrounded by developed area	<ul style="list-style-type: none"> Potential value is not low as there is good potential for ecological management
育哺場 / 繁育場 Nursery / Breeding ground	No significant record	/
久遠程度 Age	N/A	<ul style="list-style-type: none"> Again misleading. The site is over 100 years old. Most woodland are at least 40-50 years old judging from historic aerial photographs; some trees are significantly older with estimated age ranging from 70 to over 160 years (Jim <i>et al.</i> 2020).
野生生物的數量 / 豐盛程度 Abundance / Richness of Wildlife	Low abundance of terrestrial fauna	<ul style="list-style-type: none"> Abundance of bats and moth severely under-recorded
整體生態價值 Overall Ecological Value	Low to Medium	<ul style="list-style-type: none"> Should be rated as “Medium” given the unique site context, age of habitats, etc.



Sub-Area 1

Sub-Area 2



Sub-Area 1

Sub-Area 2



Google



項目地點的評級

Evaluation within the Project Site

生境 / 區域	環評報告的評估 Evaluation from the Approved EIA Report	意見 Comments
草坪地 Turfgrass	低 Medium	中 Medium
混合林地 Mixed Woodland	低至中 Low to Medium	中 Medium
林地 Woodland	低至中 Low to Medium	中 Medium
沼澤林地 Swampy Woodland	中至高 Medium to High	高或非常高 High or Very High
分區1 Sub-Area 1	低至中 Low to Medium	中 Medium

總結

Conclusion

環評報告指出：

「擬建發展項目將避開生態價值較高的區域，即分區 2 至 4 (生態價值中等或中至高等)，僅開發生態價值相對較低 (低至中等) 的分區 1」。

然而，綜合所有資料及數據，分區 1 的生態價值應獲評為中等。根據環評報告所指，分區 1 不應被納入擬議房屋發展範圍內。

It is stated in the approved EIA Report that,

‘The proposed development will avoid areas of higher ecological values i.e. Sub-Areas 2 to 4 (medium or medium to high ecological values), only Sub-Area 1 with relatively lower ecological value (low to medium) will be developed.’

As demonstrated, an alternative evaluation based on the best and latest available information would suggest a “**Medium**” rating for Sub-Area 1. In accordance with the above statement in the EIA Report, it would mean that Sub-Area 1 should also be avoided as are the remaining Sub-Areas.



總結

Conclusion

規劃署已向城規會建議將粉嶺高爾夫球場粉錦公路以東擬建公營房屋的用地暫時修訂為「未決定用途」地帶。

政府於九月一日將按計劃收回粉錦公路以東所有32公頃用地。康文署將負責有關場地的管理和保養工作，包括預留作公營房屋發展的北端部分，直至該部分交予土拓署開展工程。目前，康文署未有公佈任何有關場地管理或保養的詳情。

PlanD has proposed to temporarily rezone the proposed public housing site east of Fan Kam Road in the FGC to "Undetermined".

The Government will take back the land on 1st Sep 2023 as planned. LCSD will be responsible for the management and maintenance of the land, including the northernmost portion earmarked for public housing development until such is handed over to the CEDD for commencement of works. LCSD has not yet announced how they will manage and maintain the site.



總結

Conclusion

康文署完全缺乏管理生態敏感地點的經驗，因管理不善導致動植物直接或間接受影響的情況，過去時有發生。

LCSD lack the experience of managing sites that are ecologically sensitive. There have been many incidents where poor management of the department had led to direct and indirect impacts to animals and plants.



水池發臭康文署大殺龜



上一則



下一則



水池發臭康文署大殺龜

康樂及文化事務署管理不善，頓變殺龜元兇！九龍公園水池飼養大批烏龜，平日吸引不少遊人觀賞。不過，惟月前水池水泵系統發生故障後久未維修，一池死水不但日漸發臭，無數隻烏龜更一命嗚呼，僅餘者亦奄奄一息，池水浮屍處處狀甚可怖，市民擔心隨時引發疫症。區議員不滿康文署效率欠奉，令公園生態環境無端遭受破壞。

■ 記者：徐少琴

位處尖沙咀遊客區的九龍公園綠樹成蔭、鳥語花香，除本港市民外，亦深受訪港旅客歡迎。然而，每日均前往公園晨運的湛先生指出，早在今年四月行經園內「中國花園」景區時，已發現水池水泵因故障停止運作，其後多次到訪仍未見有維修工程展開，原本優美的水池疑因缺氧而變池內烏龜的「葬身之地」。湛坦言對眼前景象不忍卒睹，認為康文署有虐龜之嫌，「啲池水一日臭過一日，見到啲烏龜頂唔住一日一日咁死，真係好心痛！」



康文署被揭遲遲未有維修九龍公園水池水泵，製造一場生態危機。

港聞 / 社會新聞

愛協譴責！康文署洗池變殺生 十幾條魚被曬乾僅一條生還

撰文：呂諾晉

出版：2018-09-07 19:30 更新：2018-09-08 15:56



不少公園都設有魚池，活魚在水中游動，可為環境添上生氣，荔枝角公園內的中式園林也有一個大型水池，為公園特色之一。不過有市民發現，日前該處進行洗池工作時，職員沒有撈起池中魚類，至湖水被抽乾後，剩下十數條魚奄奄一息攤在池底，慢慢曬死。康文署的做法被質疑漠視池中魚類生命，而愛護動物協會得悉事件後，同樣警告和譴責該署做法。



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2017年07月08日(六) 05:00

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池水污濁



康文署轄下公園水池烏龜數量與日俱增，惟過去3年署方零檢控，條例形同虛設。

康文署轄下公園水池為「放生」黑點，多個公園囤積逾百隻龜，成為烏龜墳場。烏龜病毒互相感染、欠缺食物，市民「放生」變「殺生」！然而，康文署竟採取「視而不見」政策。轄下公園烏龜數量與日俱增，過去3年卻零檢控，任由市民「放生」，烏龜自生自滅，修

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樹木專家批評政府跟進不力

樹木專家批評政府跟進不力

2012年7月20日 18:41



有樹木專家指，兩年前已發現倒塌的細葉榕被真菌侵蝕，曾經通知政府，批評康文署和樹木辦並無妥善跟進。本台又發現，附近有古樹的底部亦長有真菌。

除了倒塌了的細葉榕，栢麗大道仍有多棵古樹。發生塌樹嚇怕不少途人。

廣告



廣告



大樹壓校巴 | 專家指塌樹受真菌感染腐爛 立會議員批當局樹木管理不善

2022年09月16日 05:12



何文田巴富街一棵**15米**高的鳳凰木連根拔起，擊中四部車輛，事件又再反映大樹老化對行人車造成潛在危機。長春社總監蘇國賢表示，肇事大樹為鳳凰木，樹齡約**30至40**年。由於蘇國賢的小朋友在合一堂學校讀書，所以他不時到巴富街接送小朋友，見慣該樹。他指大樹外觀及結構未有明顯問題，但鳳凰木地面上的樹根很幼細，主要吸水之用，但樹幹底部的根卻很淺很薄，而且沒有大樹根支撐，樹根底部疑被真菌感染而腐爛，根部萎縮無法支撐，導致倒塌。

沙中線樹木大屠殺

▲ 上一則 ▼ 下一則



沙中線樹木大屠殺

港鐵沙中線工程釀生態災難！為配合港鐵沙中線工程，灣仔港灣道體育館及游泳池需拆卸及重置，體育館外花床因而遭「大屠殺」，大小樹木幾乎全被砍光，滿目瘡痍。港鐵與康文署死撐事前已獲批准動工，並會於完工後補種樹木作為補償，惟樹木專家直指有關補償方案形同虛設，永遠無法彌補對環境造成的損害。

相關新聞

- 康體通訂場出錯？羽毛球場變舞蹈室
- 港灣道垃圾桶阻街

連接大圍至金鐘的港鐵沙田至中環線（沙中線）去年五月獲立法會撥款正式上馬，為配合會展站的動工，康文署轄下港灣道體育館與游泳池需拆卸及重置，以騰出土地興建會展站。不過，有市民早前發現體育館外花床植物幾乎全被砍光，儼如生態災難，「有啲樹種咗喺度十幾廿年，咁就斬咗佢，真係可惜！」高先生指樹木的健康狀況一直良好，質疑「大屠殺」乃屬「私刑」，要求部門及港鐵交代詳情。

記者實地了解期間，發現體育館外花床幾乎夷為平地，大樹及灌木叢全遭「剃頭」，僅餘停車場出入口幾棵「生還者」。記者又於現場發現多棵被伐大樹留下的樹根，相信樹齡俱達十年以上且健康狀況良好。

日後種植百樹作補償

康樂及文化事務署發言人指出，上址花床面積約七百平方米，原種有多種植物，包括石栗、串錢柳、白蘭及火焰木等，樹齡由五年至廿五年不等。發言人續稱，移除樹木工作於六月八日起開始進行，工程完成後，港鐵會在上址及區內重新種



今天運動場外花床內植物幾乎全被砍光，包括逾三十棵樹木，現場留下的樹根健康狀況良好。

康文公園誘蚊黏紙恐殃及益蟲

2014年07月07日(一) 19:39

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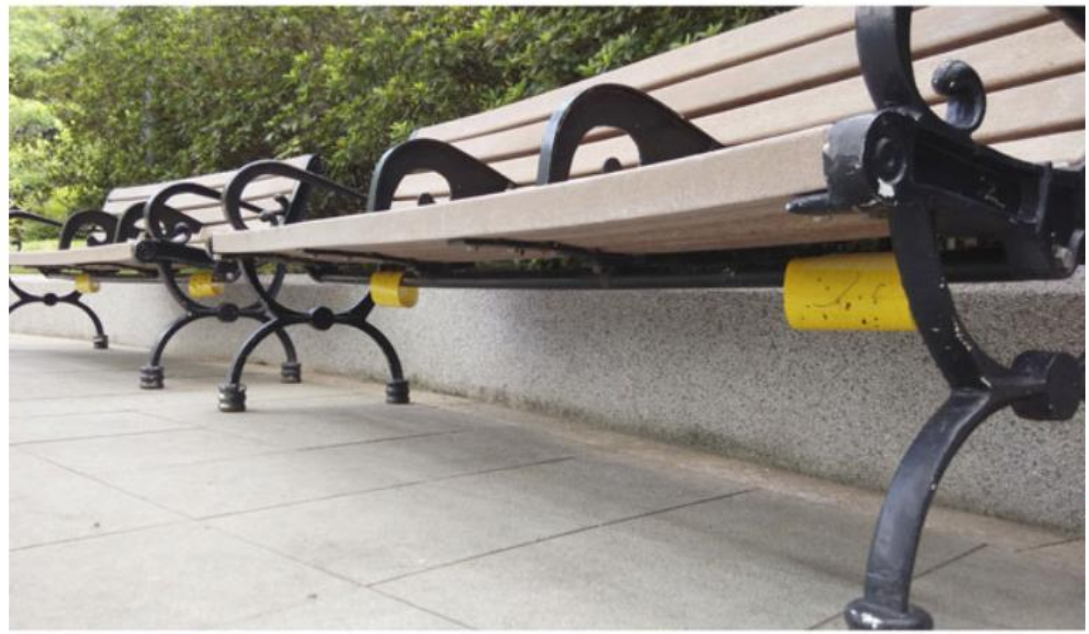
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康文署轄下公園使用誘蟲黏紙，遭市民質疑防蚊效能，並擔心會傷及益蟲。

本港蚊患指數近月激升，康文署亦於轄下公園進行防蚊工作，但有市民擔心防蚊措施會誤殺益蟲。林小姐發現，九龍灣公園內的樹木及長椅均貼上黃色誘蟲黏紙，除有蚊子黏附外，並發現有壁虎等益蟲被黏着掙扎。林指以誘蟲黏紙防蚊功效成疑，更擔心做法反令益蟲受害，「唔單止九龍灣公園，其他公園都係用呢啲紙防蚊！」



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03/04/2019

黏蟲紙變捕鳥器 康文署被轟虐畜

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【晴報專訊】春夏蚊蟲多，為減少對市民造成滋擾，康文署於轄下公園等地貼上鮮黃色的誘蟲黏紙吸引蚊蠓虻蠅，惟誘蟲紙卻成雀鳥陷阱。有市民在荔枝角公園的燈柱上，發現柱身放置誘蟲紙誤黏一隻鵲鳩，相信鵲鳩是想捕食壁虎，慘被黏實，拼命掙扎至羽毛被扯脫，幸獲暖男拯救才脫身。有專家批評，誘蟲紙捕害蟲成效不彰，反易傷害「無辜」，更曾有街貓被黏力扯走毛髮而受傷。





東網

民意被當爛茶渣 日股大翻身！經濟向榮 專家：年內再升逾一成

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康文署亂修樹變殺鳥 鷺鳥林滿地覆巢雀屍

2017年06月06日(二) 22:49更新
18:23建立



2023年6月14日(三)

26°C

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全香港第二大、被評為「具特殊科學價值地點」大埔鷺鳥林，疑被康樂文化事務署大肆破壞，署方今日(6日)胡亂修剪樹木，樹上的鳥巢慘遭破壞，幼鳥亦從高處跌下，現場所見，樹枝七零八落跌落在地上，遍地幼鳥的屍骸，甚至有蒼蠅圍着屍體，鳥蛋殼亦碎滿一地，環團斥署方做事粗疏，罔顧雀鳥生死，並形容為「巢破鳥亡」的「大屠殺」事件。



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康文署屯門鷺鳥林附近斬樹 觀鳥會憂干擾雀鳥繁殖

2023年6月14日 (三)

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2019年04月04日(四) 21:49

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觀鳥會接到舉報指有康文署承辦商人員在屯門鷺鳥林旁約50米範圍移除樹木。(香港觀鳥會提供)

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香港觀鳥會在其Facebook主頁表示，今早(4日)收到市民舉報，有康文署的承辦商人員在屯門鷺鳥林旁約50米範圍進行樹木移除工作。該會指，現時已踏入鷺鳥的繁殖季節，不少小白鷺正在該處樹上築巢孵蛋，擔心樹木移除工作會干擾鷺鳥繁殖，甚至影響牠們的繁殖成功率。該會已與康文署聯絡跟進，署方稱是針對兩棵危害市民安全的樹木，移除工作已完成。

觀鳥會指出，2017年大埔鷺鳥林修樹事件導致雀鳥死亡後，康文署應已制訂內部指引保護樹上野生動物，包括避免於繁殖期在鷺鳥林內或附近進行修樹工程，惟今次仍發生同類事件，對該署內部指引未能發揮作用感到遺憾及失望。

該會又批評康文署無吸取2017年事件的教訓，強調市民安全及雀鳥保育從不對立，只要妥善規劃工作流程，提前完成樹木評估，讓修樹工程可以在繁殖季節前完成，既能照顧行人的安全，又能讓雀鳥安心繁殖。

總結

Conclusion

位於粉嶺球場的項目地點的整體生態價值為中級或以上，故並非擬議公營房屋計劃的合適選址。

目前草圖擬議的規劃未能確保分區1的生態受妥善保護。

從生態學角度而言，由康文署負責管理項目地點，並非合適做法。

The current Project Site at Fanling Golf Course, being of at least moderate or higher ecological value, is not an ecologically acceptable site for the proposed public housing development.

The proposed OZP is ineffective in protecting the ecology in Sub-Area 1 and the rest of the Project Site.

From an ecological point of view, having LCSD to manage the Project Site is inappropriate.

