

長遠房屋策略督導委員會：

對長遠房屋策略的意見

我們是土瓜灣區內的劏房租客，我們對長遠房屋策略諮詢有以下意見：

1. 搵地起公屋 - 我們建議物色空置多年的地皮、停車場、高爾夫球場來建公屋及把空置多年的工廠大廈改建成公屋。但怕政府若因改建工廈，令不少租客被迫遷，因此政府應先安置受影響的居民。
2. 公開公屋輪候的透明度 - 按家庭人口公開不同區域的輪候人數、空置單位數目及該區未來建屋量，好讓輪候家庭可做好準備。
3. 提高公屋編配效能 - 我們建議三次配房要於半年內完成。並按公屋申請人居住的區域編配，建議修改公屋分區按港島區、九龍區、新界東、新界西及離島區劃分。
4. 重設租金管制 - 因為現時業主每年加租，每次加租\$400 至\$2000，甚至有租客因樓價升而被無理迫遷，令基層租客苦不堪言。因此，我們希望重新設立租金管制，業主加租幅度每兩年內只可加租一次，加幅不應超過 2%。
5. 修訂業主與租客(綜合)條例 - 由於現行條例，業主只需一個月通知便可隨意終止合約，對租客毫無保障。因此，我們要求修例把通知期由一個月延至三個月。此外，條例規定業主除非提出有人違法或有效證明回收自用，否則不可隨意終止合約，保障租客的租住權利。
6. 租金補貼 - 如果輪候公屋超過 3 年或以上仍未上樓的租客，可獲每月發放租金補貼，按家庭人口計算，直到編配公屋為止。

期望督導委員會能理解基層租客的困境，督促政府每年公屋建屋量，兌現梁振英特首選舉承諾，。

謝謝!

土瓜灣基層租客關注組

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2013 年 11 月 22 日



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(Email: lths@thb.gov.hk)

29th November, 2013

By email only

Dear Sir/ Madam,

Public consultation on Long Term Housing Strategy

We understand the seriousness of Hong Kong's housing problems as indicated by the shortage of housing supply and the surge in property prices. We would like to take this opportunity to express our concerns and make our recommendations regarding the measures to be taken to increase the housing supply as mentioned in the public consultation document of the Long Term Housing Strategy (the Document).

Objection to reclamation and our concerns related to development of rock caverns

As stated in Section 8.19 of the Document, "*the Government has to press ahead with reclamation outside Victoria Harbour while endeavouring to keep the impact on the environment and marine ecology to a minimum*", in order to build up a land reserve. As a general principle, we object to the use of reclamation (including the construction of artificial islands) or development that would impact ecologically sensitive marine or terrestrial habitats.

In the Stage 2 public engagement of the Enhancing Land Supply Strategy, we noted that three of the reclamation sites are located along the western coastline of Hong Kong. Needless to say, this is also the only habitat for the Chinese White Dolphin in Hong Kong waters. Land reclamation, by its nature, brings permanent and irreversible changes to the marine environment, both to the inter-tidal and sub-tidal zones. It would also affect the flow of water currents and, thus, sedimentation patterns. Indeed, following an ecosystem approach, not only the areas where the Chinese White Dolphins are frequently found should be protected but far more importantly, all the other habitats supporting their food sources including fish nursery grounds should also be preserved, *in toto*.

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In the western waters of Hong Kong, there are already many planned or large-scale work-in-progress projects (i.e., the Third Runway, the Tung Chung Remaining Development and the Hong Kong-Zhuhai-Macau Bridge). We are highly concerned that, in combination with the proposals outlined under the Enhancing Land Supply Strategy, this unique marine mammal - a flagship species for Hong Kong which is confined to shallow brackish waters will suffer innumerable hardships in their living conditions and be under even greater stress, in the future especially from a lack or greatly diminished availability of sheltered water conditions, and eventually, there will be greatly decreased numbers of the local population of Chinese White Dolphin.

In addition, we would like to express our grave concerns on the proposed idea of the construction of an artificial island in the central waters of Hong Kong. We note that the island can create 1400 – 2400 hectares of land reserve; however, without strong justification together with detailed planning and feasibility studies, we are unable to discern the underlying reasons why the construction of an artificial island should go ahead to create more land reserve when there is an alternative supply of under-utilised land for housing needs. We would like to re-iterate that reclamation causes irreversible impacts on the environment; it should be the last resort to deal with the lack of land supply in Hong Kong and careful thought should be given to such an undertaking before proceeding with such a massive project.

There might be a prevailing opinion that rock cavern development can provide a win-win situation for siting of “unpleasant” facilities like refuse collection points and wastewater treatment plants and by moving such facilities into the rock caverns, the environmental impacts (e.g., odour) associated with these facilities can be mitigated and the vacant land that is released can then be utilised for residential development. Nevertheless, it seems to us that the potential ecological impacts associated with this land supply option have rarely been mentioned. Underground development would affect aquifers, which should be stable in order to maintain the water level of wetlands or water bodies above ground; any disturbance to the underground water tables could cause serious ecological impacts (e.g., reducing stream flow and volume). Streams and rivers constitute one of the most valuable wetland types in Hong Kong since they contain habitats for many freshwater aquatic species of high conservation concern, of which some species are endemic to Hong Kong.

Therefore, the potential ecological impacts caused by the development of rock caverns should be seriously considered before wide-scale adoption of this technology in Hong Kong. Although many technical measures (e.g., grouting, waterproofing) can be employed to mitigate



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the impact on the underground water table, no one can be certain that they always work; in fact, the movement of underground water is hard to predict. As with the impact of coastal reclamation, the effect of underground development is permanent and irreversible. Since 64% of the underground area of Hong Kong is suitable for rock cavern development, there should be plenty of room to prevent conflicts between this relatively innovative development option (in Hong Kong) and the conservation of wetlands. Indeed, the Civil Engineering and Development Department (CEDD) has also mentioned that “*potential impacts can be largely avoided to its maximum extent through site selection process*” (in “Enhanced Use of Underground Space in Hong Kong – Feasibility Study”, CE 66/2009 (GE)). We urge that this principle should be adhered to.

Therefore, in view of the irreversible ecological impacts caused by coastal reclamation and rock cavern development, we urge the Government not to consider these options until other alternatives for supply of land (as further described in the following sections) have proved to be unfeasible or exhausted.

A thorough consideration of alternative land supply options

Urban renewal through increasing density of development

We agree that some of the older urban areas should be re-built and the plot ratio of some areas could be adjusted in order to facilitate the efficient use of land since such older districts are nowadays much better served by the continuous improvements in the provision of public transportation networks. We understand such changes to the building density in the older urban districts would cause some unwelcome social impacts (e.g., an increase in traffic volume and higher demand for medical, recreational and educational services). However, these are not undesirable “trade-offs” that the local residents should bear but represents an opportunity for the Government to re-assess the capacity of the local community facilities and infrastructures, and to provide appropriate support to the community, if needed, such that the impact of the development to the locality is minimized.

We would also like to take this opportunity to emphasize that the expansion of road networks or other facilities should not intrude into existing areas of conservation zonings (e.g., Green Belt, Conservation Area, Country Parks, etc.), that potentially would lead to further degradation of the natural environment.



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Furthermore, we note, in some cases, where the residential project has been a joint venture between the Urban Renewal Authority and a private developer (taking the Queen's Cube in Wan Chai as an example), each residential unit was sold at an extremely high price (i.e., a 400 square feet flat with a saleable area of only 275 square feet including a balcony was priced at almost HK\$6 million¹). We consider that such development projects are not acceptable or appropriate for the general community when there is an emphasis on re-development into high-priced residential units. Re-development in the older districts should be geared towards providing affordable housing, a socially responsible service integrated with urban renewal rather than redevelopment for achieving a maximum return on investment. We do not believe that "dollar gain" should be a prime motivating factor in any re-development project that takes place in the older districts and would instead urge that re-development is focused on a socially responsible rejuvenation for the benefit of the community. The real need of the local community should be thoroughly taken into account during the planning and designing of the residential projects so that the flats can be priced and sold at a reasonable and affordable price.

Re-zoning of land and review of Green Belt sites

We welcome the idea of rezoning some types of land uses, for instance Government, Institution or Community (G/IC) zonings, and, underused industrial and commercial areas which are of little or no ecological value to supply more land for residential development. However, we strongly object to the idea of changing or re-zoning areas with conservation zonings, Country Parks and Country Park enclaves to development zonings. In Section 8.11 of the Document, we notice that the Government is planning to develop areas with Green Belt (GB) zonings which have been formed or are considered to be deserted or de-vegetated. We are concerned that such high profile decisions would set a precedent for developments within the GB zone. Some members of the general public may be given the wrong impression that by degrading the ecology and environment of the GB zones, this would eventually lead to the approval of development within the area. Obviously, this is not the intention of Government and the potential cumulative impacts which would be caused by developing the GB zones should be carefully reviewed. We note that the Town Planning Board has announced in a Government press release that any "Destroy First, Build Later" activities are not to be tolerated². We hope that the Government will uphold and consistently apply the principles in this statement.



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Review of abandoned agricultural land

We are aware that the Government is reviewing the use of abandoned or deserted agricultural land in the North District and Yuen Long area for residential development. We wish to draw attention to the fact that Hong Kong has already lost about 60% of its farmland area in the past 50 years as shown in the agricultural land utilisation data as set out in the annual reports of the Agriculture and Fisheries Department³ or the Department of Agriculture, Fisheries and Conservation⁴; the amount of fresh vegetables produced for consumption (Hong Kong only grows about 2.5% of its vegetables locally⁵) as compared with demand is a long way from ensuring food security for the people of Hong Kong; a Hong Kong scholar has already reported that the present reality of food production in Hong Kong is not desirable⁶. We should conserve our remaining agriculture areas to safeguard our capacity and potential for sustainable food production, and to protect the livelihoods of those in the rural community of Hong Kong who possess the skills and knowledge, and, wish to continue with farming as a traditional way of life.

Moreover, we would like to mention that Hong Kong is currently unprepared for the effects of Climate Change and Peak Oil which are likely to be severe. Peak Oil is the tipping point of global oil production which will be followed by an ever-decreasing flow of supply and ever-increasing price hikes, leading to economic and social instability, and is considered by leading analysts to have already arrived. Climate scientists in Hong Kong, Mainland China and elsewhere predict food shortages in the coming years due to climate change in China. Hong Kong's food supply is heavily reliant on the supply of cheap oil and gas, which is used in the production of fertilizers and pesticides, and of course, which is needed for food transportation and refrigeration. We consider that "food security" is a very serious issue and that the Government should take all possible steps to protect and conserve Hong Kong's active, abandoned and illegally degraded agricultural lands so that there is a chance of Hong Kong having increased resilience in the future. In order to safeguard this important public interest (food supply), we consider that the area of agricultural land in Hong Kong should not be further reduced (through development within agricultural zonings or rezoning of such land use).

In view of the above, we, therefore, urge the Government to establish an Agriculture Policy, that would enable effective management of all existing agricultural lands and to provide the financial and administrative incentives to encourage, support and bring all farming land into sustainable agriculture production.

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Use of Government land under short term tenancies

At present time, short term tenancies (STTs) are granted by the Lands Department for vacant Government land which have no intended use or are not required for development in the near future. According to the Hong Kong Audit Commission Report regarding the temporary use of vacant Government sites, up till August 2007, the total area of land let under STTs and made available for temporary use was 2,291 hectares⁷. Most of these pieces of land are already formed and some are to a certain degree already connected to existing urban areas. These pieces of land can be utilised for residential development. Furthermore, according to the STT Tender Results from the Lands Department⁸, from the second quarter of 2012 to the first quarter of 2013, 60 of the 75 tenders that were awarded STTs (i.e., about 80% of the total) were simply used for temporary fee-paying public car parks and the area of land involved is 37.7 hectares. We consider that these flat open area car parks should be replaced either by underground or built-up multi-storey car parks; so that more land can be released for residential development. We urge the Government to seriously review the potential of these open area car parks especially those that are located within urban areas to address the housing needs of Hong Kong residents.

Review use of brownfield sites

In a report published by The Professional Commons in 2012, there were 803.2 hectares of brownfield sites identified in the New Territories. More than half of these brownfield sites were used by the storage and re-cycling industry with one-fifth of them occupied by container storage yards. These pieces of land, like the Government land under STTs, are already open spaces and can also be used for development. Indeed, the Planning Department, and, the CEDD are already carrying out a study regarding the housing development potential in Yuen Long South⁹, in which about half of the potential development areas are actually brownfield sites (94 hectares)³. The Secretary for Development has also expressed his interest in developing brownfield sites in Hong Kong¹⁰. To conclude, we urge the Government to actively investigate the potential of all the other brownfield sites around Hong Kong (about 700 hectares), in order to optimize our current land use for urban development and to minimize degradation or destruction of our remaining scenic rural environments and to preserve natural areas of countryside.



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Utilisation of vacant lands for residential development

In response to the questions put forward by the Legislative Council regarding vacant land (on 17th October, 2012), the Secretary for Development stated that only 391.5 hectares of un-leased or un-allocated Government land are suitable for housing development¹¹, and individual sites which are under 0.05 hectares in size are considered to be unsuitable for conversion into residential housing projects. However, it can be noted from recent land transactions that some residential developments (each with a size of about 0.02 hectares) in Wan Chai and Mong Kok, were recorded in the Land Sales Programme of the Lands Department (from February 2013 to March 2014)¹². Furthermore, lands zoned as “Other Uses”, “Comprehensive Development Area” and MTR Corporation Limited properties were not included in the calculation⁵. These pieces of land amount to about a total of 160 hectares in area¹³. We consider that small vacant land lots (amounting to a total area of 95.6 hectares⁵) and the lands (of about 160 hectares) not included in the aforementioned calculation are all potential sites for residential development. We are concerned that the Government may have under-estimated the total acreage that may be available in the current land reserve.

Summary

All the above information shows that there is simply not a real shortage of land in Hong Kong. Although we understand that developing these pieces of land may be administratively more cumbersome and time-consuming (i.e., involving re-allocation, land resumption and compensation procedures) as compared to the more straight-forward process of in-filling coastal areas to form land for development, we do not consider that these should be the over-riding factors for not fully exploring their potential for development because preserving our natural environment (either the terrestrial habitats or our indeed our spectacular indented coastlines) should be of greater importance (as compared to creating ‘raw’ land) in providing a better quality of life for the people of Hong Kong.

Establishment of a Population Policy

Every piece of land, every city and every country has their own carrying capacity. Hong Kong is one of the most densely populated areas in the world and not many people with common sense would consider that it is not yet crowded enough. For our daily needs, we are also completely dependent upon imported food, water supply, fuel sources and other resources derived from the natural environment and have already extended our eco-footprint across the



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borders into mainland China and other countries. Since Hong Kong's land area is a finite resource, there would not be enough space to accommodate an endlessly expanding population while at the same time providing a suitable living environment or a good quality of life for every resident. Therefore, we strongly urge the Government to thoroughly conduct comprehensive studies on the carrying capacity of Hong Kong and to establish a Population Policy aiming to limit population growth, in order to safeguard and maintain the quality of life for all Hong Kong residents in the long term. Without a proper assessment and strategy of our long term population demographics, we consider that the housing would continue to be the major social problem of Hong Kong.

Review of the appropriateness of the Small House Policy

There has been much public discussion in society regarding the Small House Policy (SHP). In 2003, a report by a non-governmental organisation called Civic Exchange has already stated that: "*The main problem with the SHP is its fundamental unsustainability*"¹⁴; the Audit Commission also produced a report in 2002 talking about the possible abuses of the policy¹⁵. We, therefore, consider that Government should urgently and critically review the appropriateness and long term viability of this policy, and introduce measures to prevent abuse of the policy such as a new clause which restricts owners from selling the houses to non-family members, and, restricting the construction of these buildings to only within the designated 'Village zones'.

Furthermore, once designated, the "Village zones" should not be expanded; the constraints against expansion of the "village limits" should be imposed and enforced. Otherwise, such unsustainable expansion of the "Village zones" may ultimately affect Hong Kong's land supply, such that the land may not be fully utilised in the general interest of the Hong Kong public.

Conclusion

For the past few decades, Hong Kong people have generally increased their standard of living and have greater expectations for a better quality of lifestyle. In this regard, we would like to stress that this quality of living does not just only mean the size of their residential flats (i.e., a more spacious and less congested living environment) but also refers to the informal envelope of "breathing space" – the recreational and natural landscapes surrounding their community where many social activities take place. It is because of these much wider social and community needs that nature conservation has already generated much public interest and



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debate in society. In the latest Policy Address, the Chief Executive has also announced that implementing the requirements of the Convention on Biological Diversity (CBD) and formulating a local Biodiversity Strategy and Action Plan would be one of his main policy objectives. Under these circumstances, we consider that land reclamation should not be carried out without due consideration and further review – Government should fully consider both the ecological impacts and the availability of alternative land supply options. Residential land should not be formed by sacrificing our natural environment or spectacular coastlines. The current housing problem cannot be solved by just simply creating more and more land to fill the gap between the supply and demand of residential flats. We would suggest that public discussion and debate address the ways and the means in which Hong Kong should develop such that everyone living in this place can enjoy a physical and mental environment that facilitates a healthier lifestyle for both the present and future generations of this crowded and densely populated city.

The Convention on Biological Diversity

Last, but not least, we wish to acknowledge and draw to your attention – the following self-evident facts:

- 1) Humans are but one species/ strand in the ecological web that makes up our planet.
- 2) This means that, in ‘economic’ terms, we are reliant on the ‘ecosystem services’ provided by the other strands (e.g., water supply, land for growing food, and fresh air created by forests and phytoplankton).
- 3) Since the Earth is finite and ‘natural resources’ limited, economic growth must also be finite: in other words, a line must be drawn somewhere, if we are to survive.

We feels that the Government needs to be explicit in terms of where the limits of population, development and economic growth are to be drawn, taking into account our dependence on ecosystem services, as reflected in the Hong Kong Government’s legal obligations under the CBD which was extended to Hong Kong by the Central People’s Government on 9th May, 2011. Articles 3, 4, 6 and 8 of the CBD¹⁶ has required the contracting party to follow the approaches below:



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Article 3: Principle

States have, in accordance with the Charter of the United Nations and the principles of international law, the sovereign right to exploit their own resources pursuant to their own environmental policies, and the responsibility to ensure that activities within their jurisdiction or control do not cause damage to the environment of other States or of areas beyond the limits of national jurisdiction.

Article 4: Jurisdictional Scope

Subject to the rights of other States, and except as otherwise expressly provided in this Convention, the provisions of this Convention apply, in relation to each Contracting Party:

- (a) In the case of components of biological diversity, in areas within the limits of its national jurisdiction; and*
- (b) In the case of processes and activities, regardless of where their effects occur, carried out under its jurisdiction or control, within the area of its national jurisdiction or beyond the limits of national jurisdiction.*

Article 6: General Measures for Conservation and Sustainable Use

Each Contracting Party shall, in accordance with its particular conditions and capabilities:

- (a) Develop national strategies, plans or programmes for the conservation and sustainable use of biological diversity or adapt for this purpose existing strategies, plans or programmes which shall reflect, inter alia, the measures set out in this Convention relevant to the Contracting Party concerned; and*
- (b) Integrate, as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans, programmes and policies.*

Article 8: In-situ Conservation

Each Contracting Party shall, as far as possible and as appropriate:

- (d) Promote the protection of ecosystems, natural habitats and the maintenance of viable*



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populations of species in natural surroundings.

- (i) *Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.*

We consider that the Government should fully respect the CBD principles.

Thank you for your attention.

Yours faithfully,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc.

Agriculture, Fisheries and Conservation Department
Civil Engineering and Development Department
Development Bureau
Environment Bureau
Planning Department
Urban Renewal Authority
Conservancy Association
Designing Hong Kong
Hong Kong Bird Watching Society
WWF – Hong Kong

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- ⁹ Planning and Engineering Study for Housing Sites in Yuen Long South <<http://www.yuenlongsouth.hk>>
- ¹⁰ Secretary for Development's blog: Meet the challenges ahead and develop brownfield sites (28th April, 2013). <http://www.devb.gov.hk/en/home/my_blog/index_id_15.html>
- ¹¹ Legislative Council Question 16: Vacant Land <<http://www.info.gov.hk/gia/general/201210/17/P201210170305.htm>>
- ¹² Land Sales Programme February 2013 to March 2014, Lands Department. <http://www.landsd.gov.hk/en/landsale/programme_201314.htm?>
- ¹³ Local Research Community Article on 22 October 2012. <<http://localresearchcommunity.wordpress.com/2012/10/22/%E6%94%BF%E5%BA%9C%E9%9A%B1%E8%97%8F%E4%B8%80%E6%95%B4%E5%80%8B%E6%96%B0%E7%95%8C%E6%9D%B1%E5%8C%97%E3%80%80%E6%88%BF%E5%B1%8B%E5%9C%9F%E5%84%B2%E8%B3%87%E6%96%99%E4%B8%8D%E7%9B%A1%E4%B8%8D%E5%AF%A6/>>
- ¹⁴ Rethinking the Small House Policy by Civic Exchange <http://www.civic-exchange.org/wp/wp-content/uploads/2003/09/200309_RethinkSmallHouse.pdf>
- ¹⁵ Small house grants in the New Territories <http://www.aud.gov.hk/pdf_e/e39ch08.pdf>
- ¹⁶ Convention on Biological Diversity <<http://www.cbd.int/convention/text/default.shtml>>

敬啟者：

正視漂泊租客的苦況

我們來自各區面對不斷加租的租客所組成的大聯盟。近年香港住屋問題湧現 - 基層市民輪候公屋時間漫長，無可奈何要寄居於租金不斷上漲的私人樓宇。板間房、天台屋及劏房等環境惡劣的棲息處成為他們唯一的選擇。大部份基層租客還要面對屢次被大幅加租、逼遷等問題；具體苦況可用以下幾點來概括：

1. 公屋輪候時間過長，大大加重基層市民負擔

近年公屋需求不斷增加，截至去年 12 月底，公屋輪候冊上已超過 22 萬人，較前一年增加 20 至 30 百分比。然而，政府興建公屋的節奏卻未能追上需要量。租住私人樓宇因此成為基層市民等候「上樓」的必經站。對於基層市民來說，長期支付高昂的私營市場租金令他們的景況雪上加霜。

2. 以貴租捱板房、劏房意味著住屋環境在倒退以及社會不公義之存在

公屋供應短缺令私人待租物業的需求劇增。加上內地資金流入、以及政府奉承自由市場的原則，樓價不斷上升，租金上漲。不少中產家庭在無法置業的情況下亦選擇租樓。在市場供應不變的前提下，與中產家庭相比，基層市民可以負擔的只有板間房、天台屋及劏房等類型較「經濟」、環境及安全性卻參差不齊的房屋。基層市民在沒有其他選擇下唯有捱貴租、捱板房、捱劏房。住屋環境的倒退表示社會經濟發展背後，有部分人卻不能分享成果；更重要者，正如學者馮國堅指出，租金佔收入高企的比例(2011 年租金佔收入的比例是 56.33%) 大大降低基層市民的社會流動性，造成社會的不公。

3. 終日徬徨被加租、迫遷亦引伸很多家庭問題

針對租霸所製訂的「2004 年業主與租客(綜合)(修訂)條例」容許業主無上限加租及向租客發出一個月的合法搬遷要求。新例的實施頓時使租客失去合理的保障。他們無時無刻面對著「合法和合理」加租及迫遷的可能。要承受的精神壓力可想而知！而當實際情況真的發生時，除了四出找尋合乎自己租金、居住地區等期望的新居外，還要為應付昂貴的搬遷費而煩惱。房屋問題不單是住屋問題，更引伸很多家庭問題，增加家庭成員之間的衝突。

我們有以下建議：

立即檢討『業主與租客(綜合)(修定)(再修定)條例』

1. 每年修訂及檢討租例，檢討過程須由民間參與決定

2. 延長通知期至半年

3. 加租幅度不能多於每年通貨膨脹幅度(按政府公佈數字)，並在訂立租約時訂明於租約條款內，不得隨意更改；
4. 舊租客有優先續租權

全港租客大聯盟

聯絡處：全港租客大聯盟(明愛堅道社區中心代轉)
地 址：香港堅道二號明愛大廈2樓235室
關注組代表：鍾貞霞
聯絡電話：
傳 真：



29/11/2013 22:48

To 長遠房屋策略督導委員會 <lths@thb.gov.hk>
cc
bcc
Subject 港島單親互助社回應長策會諮詢文件
 Urgent Return receipt Sign Encrypt

敬啟者：

我們是港島單親互助社，由單親家長組成，關注和單親家庭相關的政策。

長遠房屋策略督導委員會在2013年9月發出長遠房屋策略諮詢文件內容，我們有以下意見：

(一)單親家庭獨特的住屋需要

對單親家庭來說，有一個穩定的居所，才能使我們安心生活。我們有很多單親家庭居於舊式唐樓內的劏房，環境衛生和設施都比較差，亦會經常擔心遇到火警。此外，單親家長與小朋友同住，需要在家煮食，方能維持日常開支，但是套房比較細和狹窄，而且廚廁共用，煮食會很不衛生也不方便。加上居住環境品流複雜，需和其他陌生的租戶共用劏房內的設施，單親家長更加擔心子女和自己的安全。

再者，租住私樓時遭到歧視，有些業主不喜歡租戶有年幼的小朋友，覺得小朋友會在住所內到處破壞，亦擔心有其他租客投訴小朋友聲浪太大，對其他住客造成滋擾；部分業主會認為單親家庭領取綜援或低收入而會在月尾無錢交租，所以拒絕租給單親家庭，因此我們在私人市場更難租住合適的居所。現時私樓的租金昂貴，單親家長經常需要壓縮其他生活開支以應付租金，面對沉重的經濟壓力，而且經常擔心遭業主加租或逼遷，租住劏房令單親家庭貧窮情況越來越嚴重。

(二)有關公屋建屋量

根據諮詢文件，推算未來十年本港總房屋需求，介乎440,000至500,000個單位之間，建議供應目標為470,000個單位，未來十年公屋總建屋量大約為廿三萬個，但現時輪候公屋人仕超過廿三萬，根本供不應求，如以廿三萬建屋量為目標，根本滿足不到公屋輪候數字，亦不能夠達到平均輪候公屋時間為大約三年的目標，所以我們建議公私營建屋比例為70:30，而且比例應更彈性，以住戶的住屋需求調整，若公屋的需求增加應再調高公營房屋比例。

(三)興建過渡性房屋

我們同意在合適的臨時空置土地興建過渡性房屋。以港島區為例，一個100呎的劏房，每月租金需要\$4000，對低收入或綜援單親家庭構成很大經濟負擔，同時也擔心業主提出加租。如果能夠在輪候公屋期間有過渡性房屋供我們選擇，一來我們可以節省租金開支，既可以改善生活，又能夠為我們提供較穩定的居所，二來如果有份輪候人仕選擇入住過渡性房屋，使可以減少劏房的需求，同時劏房業主會調低租金或改善劏房環境，以吸引租客，所以過渡性房屋可在短期內舒緩房屋壓力。

所以，我們希望長遠房屋策略督導委員會能夠收到我們的建議，向政府反映，急切改善基層市民的房屋需要，好讓我們能夠安居樂業。

此致

長遠房屋策略督導委員會

如有查詢，可電郵給港島單親互助社，電郵地址：singleparenthk@gmail.com

港島單親互助社

29/11/2013

致運輸及房屋局張炳良局長及各長遠房屋策略委員會

「土瓜灣街坊會」乃由居於九龍城不同背景的基層小組團結成立的聯席，我們目的是回應首個於九龍城成立的市區更新地區諮詢平台對九龍城的市區更新計劃，如實反映基層居民面對居住的困難。我們轄下的九個小組分別為：

1. 九龍城社區關注組
2. 十三街五街社區關注組
3. 土瓜灣社區家長關注組
4. 土瓜灣基層租客關注組
5. 關注舊區家庭發展小組
6. 耆英團結組
7. 土瓜灣開心關心組
8. 長期輪候公屋大家庭關注組
9. 土瓜灣家庭互助組

對於 貴局於本年九月向公眾發出的長遠房屋策略諮詢文件，我們十分認同 貴局提倡的「凝聚共識，建設家園」的目標；這更使我們聯想起「九龍城市區更新」計劃以「以人為先，地區為本，與民共議」的概念。可惜，聯席於市區更新計劃的各份報告及規劃建議中，卻發現市區重建局未有落實上述概念的方案。這使我們希望 貴局能真心體恤基層居民面對的居住問題，積極處理舊區的重建問題及居民的原區安置需要。我們的意見如下：

實踐「以人為先，地區為本，與民共議」的概念

我們認為在重建前，能將區內居民「先安置，後重建」可全減除居民因重建而帶來不同的困苦及怨氣。而「原區安置」就更是居民的福音，對不同年齡層的居民影響最少，達致「以人為先，地區為本，與民共議」的概念。

支持「人文啓德」民間規劃方案 2.0

為達致「先安置，後重建」、「原區安置」的理念，首要於區內增加公營房屋的數量。我們贊成「人文啓德」民間規劃方案 2.0 中提出重組體育城設施位置，以釋放出來的地盤作公營房屋發展之用。我們贊成建議中的公屋單位給予受重建影響的租客，而又正輪候公屋之人士都優先遷入，居屋則給予區內受重建影響的小業主優先購買。

建議增加區內公營房屋的安排

我們認為在受重建影響的九龍城區內，亦可以重建區內低密度公屋如真善美邨、馬頭圍邨、樂民邨等亦是可行的方法。另在重建時，預留現時九龍城「五街十三街」部份土地作興建公營房屋用地亦能解決土地供應的問題。

安置受重建影響居民的資格

優先入住公屋單位者須是受「九龍城市區更新」影響而已於輪候公屋名冊內的申請者。而入住居屋者則為受「九龍城市區更新」影響的小業主。小業主只可優先購買居屋內其中一個單位，需要跟隨申請居屋的入息資格，但資產限額則先減除因重建而得到的賠償金額。日後有任何轉讓，亦只可售回給政府。優先安置權亦是只能有一次。

安置程序

為免在落實「人文啓德」民間規劃方案 2.0 或任何安置的方案後引起迫遷潮或任何爭拗，我們建議於明年初在區內先進行第一輪人口登記，以落實將來受重建影響住戶的名冊。

配合政策

根據現時收購的賠償政策，自住單位及有租客的單位在賠償金方面有很大的差距，直接令到小業主盡快收回出租物業，區內迫遷、沒有租約、租金飆升，「有人沒屋住，有屋沒人住」的情況屢見不鮮。小業主及租客均為苦主，對重建「未

見其利，先見其弊」。我們建議盡快改善現行政策，賠償金額不要因是否收租物業而有所不同。

我們期望局長能了解我們舊區基層的住屋問題，採納我們聯席對長遠房屋策略諮詢文件的意見。

謝謝!

土瓜灣街坊會

聯絡人：趙益漢

二零一三年十一月二十六日



九龍城區居民聯會

KOWLOON CITY DISTRICT RESIDENT ASSOCIATION

地址：九龍土瓜灣安徽街3號嘉信大廈2/F 6室 電話：23031292

致：
運輸及房屋局局長
張炳良先生

強烈要求盡快解決房屋問題

香港樓價飆升，不少市民不但無能力置業，正輪候上樓人士投訴多年來未獲配屋。部份低收入人士更在板間房、劏房等地方居住，生活環境惡劣。

住屋是市民最關心的問題，可惜政府的房屋政策仍未能解決基層市民的需要，不少家庭仍然在擠迫的空間和在惡劣環境之中生活。而許多市民每月工資，當中佔一大部份要付租或供樓，每月所餘無幾，生活質素無法提升。

為解決房屋問題，本人建議：

- 1.) 盡快覓地興建更多公屋，縮短輪候上樓時間，增建居屋，協助市民改善居住環境。
- 2.) 定長遠的人口政策，保持定期評估房屋需求，統籌、監察及落實各項措施，包括定期檢討公營及私營的房屋供應量，改善市民生活質素。

九龍城區居民聯會
土瓜灣南社區服務處
林博 謹啟
2013年11月25日



01/12/2013 21:48

To lths@thb.gov.hk

cc

bcc

Subject HKPASEA:專資會就「長遠房屋策略諮詢文件」之意見

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運輸及房屋局局長

張炳良教授, GBS, JP 大鑒：

就「長遠房屋策略諮詢文件」之意見

香港專業及資深行政人員協會一直關注香港房屋政策發展，並支持長遠房屋策略督導委員會提出之長遠房屋策略諮詢文件。

期望政府透過各種可行之方法增加公私營房屋供應，回應市民住屋的迫切需要，並密切監察市場變化，適當調整房屋供應，維持房屋市場健康發展。

現謹附上有關意見書，供閣下參閱。

敬頌



鈞祺！

香港專業及資深行政人員協會

會長 謝偉銓 敬啟

二零一三年十一月二十六日

附：意見書

 
20131129-L-R-LTHS-Prof_Cheung.pdf HKPASEA_68_Comment-on-long_term_housing_strategy(final).pdf



HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION
香港專業及資深行政人員協會

運輸及房屋局局長
張炳良教授，GBS, JP 大鑒：

就「長遠房屋策略諮詢文件」之意見

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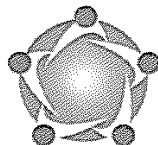
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鈞祺！

香港專業及資深行政人員協會

(已簽署或已印章)

會長 謝偉銓 敬啟

二零一三年十一月二十六日
附：意見書



HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION
香港專業及資深行政人員協會

就《長遠房屋策略》諮詢文件之意見

2013年11月

香港銅鑼灣渣甸街54號富盛商業大廈9C室
Unit C, 9/F, Prosperous Commercial Building, 54 Jardine's Bazaar, Causeway Bay, Hong Kong
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HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION

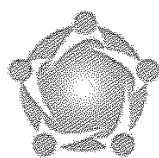
香港專業及資深行政人員協會

2013/2014 年度

理事會成員名單

會 長	:	謝偉銓測量師	
創會會長	:	容永祺先生, SBS, MH, JP	*理事會當然成員
前任會長	:	胡曉明工程師, BBS, JP	*理事會當然成員
常務副會長	:	盧偉國議員, BBS, MH, JP	
副 會 長	:	史泰祖醫生, JP	伍翠瑤博士
		吳長勝先生	林大輝議員, SBS, JP
		林雲峯教授, JP	陳世強律師
		梁美芬議員, SBS, JP	李鏡波先生
		陳紹雄工程師, JP	羅范椒芬議員, GBS, JP
		黃友嘉博士, BBS, JP	周伯展醫生, JP
		林義揚先生	黃偉雄先生, MH
		劉勵超先生, SBS	
財 務 長	:	陳記煊先生	
秘 書 長	:	李惠光工程師, JP	
副 秘 書 長	:	梁家棟博士測量師	
理 事 會	:	馮柏棟先生, BBS, SC	吳德龍先生
		曾其鞏先生	鄧淑明博士, JP
		陳鎮仁先生, SBS, JP	楊位醒先生, MH
		鍾志平博士, BBS, JP	范耀鈞教授, BBS, JP
		何君堯律師	李樂詩博士, MH
		黃天祥工程師, BBS, JP	鄔滿海先生, SBS
		譚偉豪博士, JP	區永熙先生, BBS, JP
		華慧娜女士	黃錦輝教授, MH
		楊素珊女士	左龍佩蘭博士
		施家殷先生	陳重義博士, JP
		陳仲尼先生, BBS, JP	林力山測量師
		施榮懷先生, JP	梁廣灝工程師, SBS, OBE, JP
		余秀珠女士, BBS, MH, JP	葛珮帆議員, JP
		廖凌康測量師	趙麗娟女士, MH

註：依職位資歷及筆劃排序



香港專業及資深行政人員協會

經濟事務委員會

主席：盧偉國博士工程師, BBS, MH, JP

房屋規劃及地政專責小組

討論：「長遠房屋策略諮詢文件」

召集人：鄒廣榮教授

成員：

伍翠瑤博士	林雲峯教授, JP
林義揚先生	黃偉雄先生, MH
吳德龍先生	鄔滿海先生, SBS
林力山先生	施家殷先生
梁廣灝工程師, SBS, OBE, JP	楊章桂芝女士
洪綺敏女士	劉敏儀博士
劉瑛琳女士	李煥明博士
梁美智女士	潘國城博士, SBS, OBE
王惠蘭女士	姚潔凝女士
姚俊佳先生	

註：排名依本會職位資歷、英文姓氏排列



香港專業及資深行政人員協會
就《長遠房屋策略》諮詢文件之意見

香港專業及資深行政人員協會
就《長遠房屋策略》諮詢文件之意見
2013年11月

香港專業及資深行政人員協會一直關注香港房屋政策發展，曾於2010年9月提交本會之「房屋政策的立場」，建議特區政府重新制訂長遠房屋策略，深入研究香港房屋需求，定下中長遠房屋規劃。

本會支持長遠房屋策略督導委員會提出之長遠房屋策略諮詢文件，深入探討了社會不同階層人士之住屋需要及困難，包括劏房問題，並就此提出短中長期措施。本會期望政府透過各種可行之方法增加公私營房屋供應，回應市民住屋的迫切需要，並密切監察市場變化，適當調整房屋供應，維持房屋市場健康發展。

本會經過詳細討論後，現就「長遠房屋策略諮詢文件」之「意見分享」部份提出以下意見：

1. 贊同以供應主導策略 提高公營房屋所佔比例

香港物業市場近年因供不應求持續熾熱，尤以小型住宅單位為甚，樓價及租金不斷飆升，確實已脫離升斗市民實際可承受的基本生活負擔能力。差餉物業估價署的私人住宅租金指數資料顯示，甲類住宅(實用面積 40 平方米之下單位)2012年臨時指數達 149.7，較 2004 年的 75.5，上升 98%，而乙類住宅去年之臨時指數亦達 140.5，較 2004 年上升 83%。雖然政府推出了各項「管理需求」措施，暫時為物業交易降溫，私人住宅租金仍趨向上，讓租住私人物業的市民苦不堪言。中原地產之新簽租約統計，今年 9 月全港 85 個大型私人住宅屋苑建築面積之平均租金，每平方呎更上升至 23.1 元，創下歷來新高，超逾 97 年的水平。

住屋租金一直是租住私樓的基層與中等收入家庭之重大生活負擔，於 2011 年人口普查有關租住私人住宅單位之數據顯



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示，月入一萬元以下家庭，其租金與收入比率中位數為 41.2%，較 2001 年的相關中位數 35.4% 為高；月入一萬元至三萬元以下家庭，其租金與收入比率中位數亦達 31.1%，高於 2001 年的相關中位數 29.5%。在租金一加再加下，現今租金與收入比率中位數可能已達新的高位。

住屋開支越來越大，直接削弱市民滿足其他基本生活需要的能力，包括食物、交通、水電等日常開支，在難以負擔的情況下，越來越多市民被迫租住一些較便宜，但居住環境惡劣，甚至不安全的地方，將衍生更多社會問題。本會認為增加房屋供應已刻不容緩，政府有實際需要主動協助市民解決住屋困難，以確保社會持續和諧穩定發展。

本會支持政府以供應主導作為長遠房屋策略，積極紓緩住宅供求緊張的情況，但同時必須密切監察房屋供求變動及市場訊息，按市場情況適當調節房屋供應，防止樓價因供過於求而大幅波動。本會認同每年須檢討房屋需求推算方法和推算結果，靈活配合市場的變化，避免重蹈覆轍。

在供應主導策略下，本會認為政府必須尋求一切可行之方法增加建屋土地供應，包括盡快落實發展新市鎮及開拓新發展區，包括東涌、新界東北、洪水橋等、加快舊區重建步伐，盡快增加房屋供應，達到所定下的建屋目標。

本會期望政府規劃新發展區時，應以商住混合模式發展，配合完善之基建設施及交通網絡，尤其連接鐵路網絡，發展地區經濟，提供就業機會。本會建議政府研究為在新發展區工作之公屋申請人，提供公屋輪候優先安排，增加市民遷入該新發展區居住並在本區就業的誘因，亦間接減少跨區交通的負荷。

本會亦支持政府提高公營房屋所佔比例，盡快增加公屋及居



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屋供應，並縮短公營房屋落成至編排居民入住所需的時間，盡快為有需要之低收入人士提供安居之所，亦為合資格人士提供置業安居的選擇。穩定的居住環境是家庭和諧的最基本因素，尤其是年輕家庭，將有利其實行家庭計劃，房屋長遠規劃必須與人口政策互相配合及呼應。

2. 應關注非本地生留港升學/工作對房屋需求之變動

內地家長及學生對香港國際化之大學教育趨之若鶩，加上自2008年政府推行「非本地畢業生留港或回港就業計劃」，非本地生畢業後可留港12個月，更吸引越來越多內地生來港升讀學士學位及修讀研究院課程。教育局數字顯示，2012/13年度由教資會資助的課程，包括學士學位、研究院研究課程、研究院修課課程，共有10,963名內地生，較2006/07年度的5754人上升90%。隨著市場對香港高等教育課程之需求，提供專上教育之機構亦由2007/08年度之22所增至目前之30所，除了教資會資助課程，各種各樣自負盈虧之學士學位、研究院修課課程相繼開辦，內地生來港升學的數字勢將繼續增加。

大部份內地生畢業後均會選擇留港工作，按保安局數字所見，透過上述就業計劃在香港工作之非本地畢業生，自2008年至今年8月共有2.8萬人，當中95%為內地畢業生。而去年更有980名非本地畢業生因連續居港滿7年取得永久性居民身份，往後將不再需要申請延期可自由留港。

本會認為非本地生來港升學及留港工作所衍生之住屋需求較難準確預計，本會建議政府在檢討房屋需求推算方法和推算結果時應留意上述數字之變化。

3. 合理運用居屋資源

「居者有其屋」計劃為資助房屋政策的一部份，政府有責任合理運用居屋資源。本會建議考慮在新出售的居屋加設條



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件，定明在有關居屋業主離世後，相關遺產承繼人須接受入息及資產審查，若不符合計劃之資格，承繼人須按其時居屋售價比較樓宇市價的折讓率補付現值差額或讓出居屋，提高居屋流動性。

4. 促請政府撥地發展中高收入長者住屋計劃

香港人口正在老化，至 2041 年人口中每三人便有差不多一人年屆 65 歲或以上，在香港現時 65 歲以上人士入住院舍比率約 6.5%(2010 年資料)，較台灣(2%)、澳洲(5.4%)等地方為高。本會同意人口政策諮詢文件提出構建一個友待長者環境之重要性，並有需要為長者提供一個安全舒適的屋住環境，安享晚年。

本會贊成政府繼續於照顧基層市民之公屋設計，增設照顧長者需要之配套，並支持政府鼓勵私人市場發展專為中高收入長者而設之住屋計劃，提供一站式家居及護理服務。

本會認為政府亦可預留一些土地，指定私人住宅發展項目中須有部份樓宇/單位撥作長者住屋計劃，提供長者家居服務及相關配套，有關服務交由發展商負責營運，政府可提供長者家居及護理服務營辦機構的資訊及經驗參考，例如房協丹拿山項目的做法，既有助本港銀髮市場發展，亦釋放長者原本居住的單位再度投入市場，有助增加房屋流轉。

5. 適度提高地積比率 研究加快低密度舊公屋屋邨重建

在土地需求持續增加下，政府有責任善用土地的容納量，配合相關交通配套及發展地區經濟，盡快增加房屋供應。本會支持政府適度提高地積比率，提升發展密度，興建更多公營房屋單位。若因交通網絡或基建配套限制發展密度，例如東九龍安達臣道新發展區，本會認為政府可彈性分割土地，例如把土地一分為二發展，先按適當地積比率發展其中一部份，充份利用土地之合理容納量，待完善基建設施及交通配



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套後，再發展餘下的土地，以達到地盡其用的目的。

對於目前現存一些樓齡較舊的公屋屋邨發展密度較低，具有很大之重建潛力，例如黃大仙彩虹邨及東頭邨、觀塘坪石邨、深水埗南山邨、大坑東邨、九龍城真善美邨等。本會建議政府把握與低密度舊公屋同區或附近地區新公屋落成之機會，盡快安置相關舊公屋居民，加快重建低密度舊公屋屋邨，透過適當提高地積比率，增加房屋供應。例如新啟德公屋可協助安置黃大仙彩虹邨及東頭邨居民，以便加快舊公屋重建。本會提議政府應就低密度舊公屋屋邨重建，展開策略性研究，提出加快重建之可行方案及時間表。

6. 同意為有迫切住屋需要人士提供房屋作過渡安排

本會支持政府興建一些特定用途之房屋，為有迫切住屋需要之家庭或人士提供暫時性可供租住之單位，包括居於不安全劏房之租戶等，相信亦有助配合政府日後就劏房實行規管之需要。本會建議上述房屋之編配標準應較公屋嚴格，並設有租住限期。

7. 促請政府透過發牌及業主登記制度規管劏房問題

俗稱「劏房」之分間樓宇單位在香港市區能夠遍地開花，源於市場之需求，加上住宅單位租金日趨昂貴，令租金相對整個住宅單位較低之劏房成為低收入家庭及人士之「必需品」，亦鼓勵單位業主把單位變身一間間劏房圖利。長遠房屋策略督導委員會 2013 年初就分間樓宇單位住戶進行之調查，估算全港約有 6.69 萬個劏房，但這個數字或許只是冰山一角，政府在未有任何法律依據下，實難以透過巡查，掌握確實之劏房數目，始終未能對症下藥。

劏房為一些租客提供可負擔之居住空間，不少單位業主為吸引租客租住任意重新設計單位間隔，而大幅度的改裝將加重樓宇之負荷，以及影響樓宇結構及消防安全。早前發生之馬



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頭圍塌樓事件中之樓宇正正因為本身存在大量劏房，曾進行大規模之非法改動，包括掉換洗手間及廚房等位置、隨意於劏房加設洗手間等，破壞大廈結構，增加塌樓風險。

為保障住客之生命安全及財產、阻止劏房問題惡化，本會促請政府必須盡快立法規管劏房問題，推行發牌制度，並配合業主登記制度的過渡性安排，鼓勵擁有劏房之業主自願登記，接受政府監管，不符合安全規定的劏房應按規定加以改善，甚至被取締，相信上述制度有助政府逐步掌握劏房的實際數目及有關樓宇的安全情況，同時亦能起阻嚇業主非法改裝房屋的作用。

本會亦建議政府定下處理劏房問題之時間表，增加相關部門之人力資源處理劏房問題，以及準備特定用途之房屋安置受影響之劏房住戶，配合上述規管措施，但長遠而言政府仍必須增加公營房屋的供應。

8. 就其他房屋計劃重推與否之意見

首次置業貸款計劃為合資格人士提供置業貸款之成本較提供公營房屋為低，且資助金額較具彈性，但實施此計劃的前提為市場必須具有足夠房屋供應，本會認為首次置業貸款計劃屬可取的計劃，但在目前房屋供求失衡的情況下，並不是適當時候重推。

至於租者置其屋計劃，在公屋供不應求之情況下亦不適宜重推，且計劃下之公屋樓宇由於業權分散，以致難以就管理及維修方案達成共識；而租金援助及租務管制亦弊多於利，包括減低私人住宅單位租盤供應量、引致租金波動等，因此本會不贊成重推較多爭議之租置計劃，以及租金援助、租務管制。



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9. 應定期檢視公屋輪候冊申請者之資格 提升公屋編配效率

公屋輪候冊越來越長，一般申請者與配額及計分制下非長者之一人申請者分別有 29% 及 30% 等候時間超過 3 年，本會建議房委會應完善輪候冊之管理，提升公屋編配效率，包括應訂定機制定期檢視申請者的入息和資產，把入息或資產不合資格之申請者從公屋輪候冊上剔除。尤其現時有 67% 配額及計分制下非長者一人申請者為 35 歲或以下，應屬於年輕力壯之勞動人口，當中 47% 更具專上學歷，有潛力向上流動，很大機會會超逾申請公屋之入息及資產限額，故本會建議政府亦應檢討配額及計分制，合理編配公屋資源。

10. 收緊富戶政策並率先處理較多公屋寬敞戶之屋邨

不少公屋住戶入息及資產大幅改善，為提升公屋的流動，縮短輪候公屋的時間，本會認為政府有必要檢討及收緊富戶政策，只要公屋住戶的入息或資產其中一項超出有關限額，應嚴格規定該住戶必須遷出公屋。

另目前約 5.5 萬個公屋寬敞戶，拖延搬遷 2 年至 10 年不等，審計處早前亦提及公屋寬敞戶拖延搬遷的問題，引起社會關注。本會建議房委會應就公屋樓宇進行調查，收集及整理寬敞戶之確實數目，並率先處理較多寬敞戶之公屋屋邨，政府應在較多寬敞戶公屋屋邨附近覓地興建細單位之公屋，原區安置有關寬敞戶，亦應特別留意長者住戶之需要。

本會建議把寬敞戶原來的公屋單位，連同因收緊富戶政策而回收之單位以及逾萬個空置單位等，盡快重新編配予公屋輪候冊申請人。

11. 贊成邀請私營機構參與提供資助房屋

政府早於 1978 年已邀請私人機構參與興建居屋，做法行之已久，亦有效加快居屋之供應，故本會贊成政府邀請私人發展商參建資助房屋，但建議政府應設有機制，確保資助房屋



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的質素。

12. 促請政府積極考慮輸入建造業人才

香港正逐步展開多項大型基建工程，亦急切需要興建大量房屋及加快舊區重建，對建造業人才的需求大增，但近年建造業缺乏年輕人入行，部份工種出現青黃不接、技術錯配等問題，建造業各工種人手均嚴重短缺。為吸引人才，建造業職位薪酬不斷上升，加重基建設施、公私營房屋之建築成本，據建築署資料顯示，建築工程投標價格指數 2013 年第二季為 1532，較 2003 同期指數 723 增加逾 1 倍，反映建築成本正不斷上升，最終有關成本將轉嫁消費者。

本會促請政府就建造業人才不足問題推出短、中和長期措施，協助推廣建造業之培訓機會、行業發展及前景，吸引更多年輕人入行，並積極考慮在不影響本地工人之就業機會及薪酬下，輸入相關的外地人才，應付發展的需求。

結語：

總括而言，本會認為政府因應需求提供足夠之房屋供應的同時，應完善管理現有之公屋及居屋資源，提升公營房屋之流轉及編配效率，讓更多有需要的市民獲得住屋支援。長遠而言本會亦支持政府透過逐步放寬目前的編配標準，改善現有公屋住戶之居住環境，讓香港每個人也能夠安居樂業。

MASTERPLAN LIMITED

Planning and Development Advisors

領賢規劃顧問有限公司

Secretariat, Long Term housing Strategy
Steering Committee
1/F, Block 2
Housing Authority Headquarters
33 Fat Kwong Street
Ho Man Tin, Kowloon

29 November 2013

Fax: 2761 5160

Dear Sir,

Submission in response to Long Term housing Strategy

I refer to the Long Term housing Strategy Consultation Document, which is currently inviting public comments.

Housing tops the livelihood issues to the general public, and is getting more serious. We have given thorough consideration in the matter. Please find the enclosure for your consideration.

Should you require any elaboration on the submission, please do not hesitate to contact myself or Cynthia Chan of our office.

Yours faithfully,

(Signed)

Ian Brownlee
For and on behalf of
Masterplan Limited

Enc.

Submission to the Long Term Housing Strategy Consultation Document (the Document)

Part A : General Responses

1. Private Sector Housing Under-played

The whole approach presents a public housing bias and has down-played the importance of the private sector in meeting housing needs. The high price for private sector housing is largely the result of government refusing to sell land during the previous administration for fear of the property market reaching a crisis. There must be a strategy for continued sale of land for private development so that the price of housing remains reasonable. There is no analysis of the economic importance of private housing in terms of Hong Kong's economy, private investment implications and the accumulation of wealth by households who own property. The whole Document is therefore lacking in this vital component.

2. No Justification for a 60:40 Split

The proposed split is arbitrary and cannot be used as a justification for proportional use of land for residential purposes. The public sector housing provision will be so large as to adversely impact the future of Hong Kong in social terms and economic terms. For example, a flat in the private sector will be traded 8 or 9 times during its life as people buy and sell, accumulating family wealth. Every flat in the public sector prevents this from happening. There is historically no excessive vacancy rate in private housing, which means more is in need and it will provide a basis for people to move up the housing ladder.

3. Future Social Problems

The new NDA's planned to meet the 60:40 split will be repeating the problems of Tin Shui Wai where large concentrations of people with similar social characteristics and problems will be focused in the same neighbourhoods. A better mix of housing types is essential in the NDA's and a more balanced mixture of housing and social types must be considered. No more than a 50:50 split should apply in the NDA's.

4. Too Much Compartmentalisation

The Document tries to solve the 'problem' by classifying people into various groups and establishing criteria for each one. The idea of equality in the community in terms of 'benefits' to be achieved or allocated becomes increasingly difficult to achieve. Instead of increasing the range of categories of people and housing types, a more egalitarian approach should be taken, and reduce the categories.

5. Social Liability

The creation of more and more public housing increases the liability for the Government as the largest landlord in Hong Kong. The result is large concentrations of people reliant on social housing in the same locality. It also limits the housing choice for many people. In terms of social policy it would be more desirable to encourage diversity. The provision of financial support in terms of loans or rental subsidy to people, so that they can use private sector housing to remove the requirement for Government to provide public housing. The current shortage of housing should not preclude consideration of this approach in a long term strategy. It also creates an argument for not sticking to the 60:40 split.

6. Similar Problems Elsewhere

These housing problems are not only in Hong Kong and they may not be a local phenomenon. The same issue is current in the United Kingdom and Australia, for example, but varies from place to place. A consideration of the issues in these places may put a wider perspective on the issue and could put the relevance of the global economy as a factor in the Hong Kong context.

Part B : Responses to Questions

Q1 What are your views on the proposal to adopt a supply led strategy for the LTHK and with public housing (comprising public rental housing (PRH) and subsidised sale units) accounting for a higher proportion of the new housing production?

Equitable quantity of housing should be provided for public rental tenants who are already enjoying public housing benefits, waiting list applicants who are unable to afford private rental accommodation, and individuals who are also tax paying but do not benefit from public housing.

The Document is not considered conducive to the government's housing policy objectives identified in the Chief Executive's 2013 Policy Address, "assist the public to choose accommodation according to their affordability and personal circumstances and encourage those who can afford it to buy their own homes". "The Steering Committee recommends the Government to play a more proactive role in providing housing suitable for the average households, and to increase the supply of public housing (page xiv)" (emphasis added) somehow becomes "the new LTHS should be a supply led strategy, with public housing accounting for a higher proportion of the new housing production (page xiv)". The reoriented focus from housing provision for the average households to a public housing dominated strategy for those who meets the means test is not considered well founded.

The housing problem should be distinguished whether it is a real under supply, property prices/ rents being beyond the affordability of the general public, or mismatch in housing types/ quality/

living conditions. The supply-led approach by increasing public housing provision, will not necessarily bring about housing affordability or matching the desired housing types/ quality/ living condition, and would not solve the problem. In particular, the public housing focus of the strategy disregards the squeezed middle group whose income exceeds the threshold and yet cannot afford in the private housing market.

The Document focuses on public housing, to the extent that "it is the ultimate solution to the problem (page viii)". The government's direct control on public housing as a solution to the housing problem is appreciated. However, the dominant government involvement means any change in government, political will, or budget, could have implications on the long term strategy.

Q2 Do you have any views on the principles and methodology adopted for projecting the long term housing demand?

It is not appropriate to just include all sub-divided units as being inadequate housing. Paragraph 4.20 of the Document indicates that 59,000 units are actually of reasonable condition and many have suitable facilities. Some people may not need to have a kitchen, for instance. This form of housing has long played an important role in serving certain sectors of the community, and not all residents need to be of a low income, and some units may be similar to serviced apartments in function in some locations. The assessment has therefore over-estimated the impact of sub-divided units as a negative component. Instead there is a need to ensure that there is adequate light, ventilation and fire services provision in the analysis before considering them all as unsuitable or inadequate.

Q3 Do you have any views on the criteria used to define "inadequately housed"?

See above response to Q2. 74,900 of inadequately housed households in SDU's is not a true assessment of the actual need.

Q4 In addition to the major demand components as mentioned in Chapter 4, are there any other factors which you think should be taken into account in projecting housing demand?

Indigenous villagers right should be dealt with. Indigenous village house competes with the general demand for land, and should share the fact that land resource in the city is in shortage. Their rights to such a house need to be re-assessed as to whether it is reasonable to continue with into the future. It is suggested that the entitlement to 3 storeys over 700 square feet equivalent be allocated in high rise towers in suitable locations, instead of detached style houses.

Q5 Do you have any views on the projected total housing supply target for the next ten years and the proposed public/ private split for the future new housing supply?

Annual review of the 470k housing supply target is fundamental and crucial.

The proposed public housing accounting for 60% of new housing production is compared with the generally established 50% split. The Secretary has admitted that the split is an arbitrary figure. Justification to such a change is therefore warranted.

- i. "PRH is the primary housing solution for the grassroots (page xx)" How about a housing solution for the middle class being marginalised in home ownership?
- ii. "The boom in the private housing market also contributed significantly towards wealth creation (page 10)" Is the 40% new private housing providing fair opportunities for wealth creation for the middle class and the well-to-do?
- iii. Public housing is generally associated with stigma and social issues. Is the 60:40 split an appropriate social mix for the future Hong Kong?

The practical implementation of the 60:40 split is questioned, whether priority would be given to public housing projects in planning approvals, building plans approvals and land administration:

- i. In Town Planning Board meeting minutes, increased density in government initiated projects are generally more readily accepted than private projects, in spite of having the similar planning arguments and justifications.
- ii. Established developers generally have land stock. Ceasing land sales for private housing would exclude those developers without land stock that is unfair entry level, and interfere with the market to the extreme.
- iii. Much of the potential greenfield land is in the private sector's ownership. In case of an implementation by prioritising public projects over private ones through land acquisition, it is likely to have associated increased transaction costs and time, delaying housing supply, and is not considered a reasonable means for implementation.

Annual review of the 60:40 split is crucial. The public housing provision, along with the stamp duty measures, helps reinforcing the commodity nature of housing instead of being an investment tool. However, it is important to strike a balance to allow housing to contribute to the Hong Kong's economy and maintain Hong Kong's competitiveness.

Q6 Should the Government continue to support the development of elderly housing projects for the middle and high income elderly as suggested by some in the community? If so, what sort of support should be given?

Development of elderly housing projects is an alternative housing for the elderly, facilitating vacation of their current houses and turnovers in the market. It should not be considered a drain on land

resources. The best support would be to provide sites for sale to the private sector limited to elderly housing but accommodating the better off. This would help develop a private sector that could accommodate elderly needs rather than relying on welfare agencies or government to provide such accommodation.

Q7 What are your views on the recommendation for the Hong Kong Housing Authority (HA) to increase the PRH quota for applicants under the Quota and Points System (QPS), and to allocate more points to non-elderly one person applicants above the age of 45 (and extend the arrangement to those who aged 40 and then 35) under the QPS so that they would have a better chance of gaining early access to PRH?

The QPS includes considerations on the waiting time, which effectively encourages application at an earlier age and unnecessarily lengthens the waiting list. Given with the prevailing later graduation, later marriage, and the increasingly more acceptable stay home adult kid culture, early access to PRH is not considered fundamental.

Q8 What are your views on the recommendation for the HA to progressively extend the PRH three year average waiting time pledge to non-elderly one person applicants above the age of 35 in the long run (even though this might initially reduce the PRH units available for allocation to family and elderly applicants)?

The 3 years average waiting time pledge to non-elderly one person applicant over the age of 35 is not necessary. Given with the working age, the prevailing later graduation, later marriage, and the increasingly more acceptable stay home adult kid culture, this age threshold should be increased or the waiting time pledge for this age group removed. There is inadequate justification for this form of subsidised housing for young people.

Q9 What are your views on the idea for the HA to build dedicated PRH blocks for singletons in estates with a lower plot ratio and with sufficient infrastructure facilities, which will be provided in addition to the PRH units already committed?

Public housing estate/ building should accommodate residents of various socio-economic background to achieve social mix to avoid congregating any particular social group such as singleton, elderly and residents of transitional housing, and their perceived stigma. This could also allow equitable infrastructure and community services distribution. There is no justification for lower plot ratios as all land should be used to its optimum. Additional blocks should be added to take up any unused plot ratio, provided that the amenity of the existing residents is not substantially compromised.

Q10 If suitable urban sites which do not have other immediate uses are available, do you think that they should be used to provide transitional housing to those in need?

All urban sites with no immediate uses should be investigated for residential uses, not only for transitional housing. However, this should be restricted to lands with unspecified land use zoning. Lands currently zoned for other uses have been put in place for a reason when the strategic planning was carried out. They are necessary for future sustainable development. Transitional housing is just another name for permanent housing. The buildings should be built as permanent structures, but the use is transient as people move on to other forms of more appropriate housing.

Q11 What are your views on the idea of introducing a licensing or landlord registration system to regulate subdivided units in residential and composite buildings?

A licensing or landlord registration system is unnecessary as subdivided units are similar to other landlords. The focus should be on ensuring that the physical accommodation conforms to basic criteria such as the Buildings Ordinance and fire safety requirements.

Q14 There are divergent views in the community on relaunching the following schemes: (a) the Tenants Purchase Scheme; (b) providing financial assistance to first time home buyers, (c) providing rent subsidy and implementing rental control (including control on rent and security of tenure) what is your opinion?

Given with the double edge sword nature of such mechanisms as rent allowances, rental control and Home Starter Loan Scheme, it is important to leverage on the private sector's capacity, and promote and encourage public private partnership. An initiative would be an extension to the Housing Society's group B rental units, for a range of higher quality and rent/ price, and proportionate to a higher range of income and asset limits of residents. This provides a range of alternative affordable private housing option for the squeezed middle.

Private Sector Participation Scheme and Mixed Development Pilot Scheme should be made compulsory for all private developments, in lieu of premium paid to the government.

The Government should avoid over-intrusion in the private property market through rent control and security of tenure. There are many aspects to property such as an investment vehicle and over-control should be avoided.

Q16 Do you think that the "Well off Tenants Policies" should be reviewed and updated (by, for example, shortening the initial income declaration period and the subsequent income and asset declaration period; requiring tenants to move out of PRH when either their income or asset level exceeds the respective limits; or setting an additional criterion on top of the existing income and asset limits criteria to require tenants to vacate their units when their income exceeds a certain threshold, regardless of their asset level?

In the Well Off Tenants Policy, the 1.5 or 2 times the rent charge remains disproportionate to the market rent. In addition, there should be prohibitive penalty to deter abuse. In terms of the whole housing policy, these tenants are abusing the subsidised housing that should more properly be occupied by those who are not well off. The well-off tenants should be evicted and the accommodation used by others on the waiting list.

The Document raises that "tightening up the Well Off Tenants Policies may further drive tenants to the private housing market, hence unnecessarily creating additional demand for private rental housing (page 86)". However, the removal from the public to private housing sector is part of the housing ladder. In this regard, a strategy should also be devised for the private housing sector to ensure appropriate supply to help address the housing problem.

Q17 What are your views on the recommendation for the HA to further enhance its under occupation policy by providing incentives for under-occupied households to move to smaller flats on the one hand, and stepping up its action against under occupation cases on the other?

The recommended "3 months' rent waiver to under occupied households as a further incentive to move to smaller flats (page 89)" is unnecessary. The relocation allowance is adequate. As per any tenant- owner relationship, incentive is not necessary. Nil incentives should be applicable to all policies, and the resources could be spent elsewhere such as upgrading the waiting list applicants' accommodation who are unable to afford private rental accommodation.

When children of an existing public housing tenant apply their own public housing, the parent family should be simultaneous relocated to smaller unit to encourage stay home adult kid and to avoid under occupation.

Territory Wide Overcrowding Relief and Living Space Improvement Transfer Scheme make reference to living density, household size and period of residence. Living density is the appropriate consideration; household size should correspond to living density and its absolute size should not be a relevant consideration; similarly period of residence is irrelevant rather consideration should be given to the period of over-crowdedness. The housing crisis calls for this policy to be strictly enforced.

Q19 What are your views on the idea for the Government to invite the private sector to get involved in the provision of subsidised housing?

The Document should give equal weight to the other housing providers including private developers, quasi-public authority such as Housing Society and Urban Renewal Authority, instead of assuming them as supplement solution to the housing problem. Other housing providers should be given equal representation in the market to create such capacity to better respond to the market needs in terms of unit sizes, quality finishes, and residential clubhouse facility provision. Otherwise, perhaps a housing strategy for the other housing providers should be devised, and the reference to the future public: private housing construction at 60:40 should be removed.

Beyond public housing e.g. My Home Purchase Plan and Home Ownership Scheme flats, requires a range of private housing types and quality to allow a price range to achieve housing affordability for those who are not eligible for public housing and those aspire for alternatives.

Q20 To speed up housing supply, what further efforts do you think the Government could make to facilitate housing development and to increase manpower supply in the construction industry?

- i. There are private housing completed but not made available in the market, some for as long as 10 years. Land lease should include conditions to ensure timely availability to the public, beyond the existing completion date requirement.
- ii. There are empty nesters occupying units of sizes larger than they need/ want, hindering the availability of the larger unit sizes in the market for the newly formed younger families. Private empty nesters housing should be provided with assistance/ allowance to vacate to bring about turnovers of family size units in the market.
- iii. Flat sharing is relatively uncommon. It could be promoted and encouraged as an alternative housing option for young individual's independent lifestyle as opposed to ownership. It would probably also be a cheaper and safer option than subdivided units.
- iv. The land lease conditions on unit sizes are applauded to result in the appropriate rental/ sales price for new entrants into the private housing market. The smaller unit sizes are necessary to form a progressive housing ladder, from public rental housing to public home ownership and eventually to the private sector.
- v. The "aging in place" principle exempts households with elderly in under occupied units from relocation. Under the same principle, households with elderly in overcrowded units should also not be entitled to relocation, for fairness.

The development process in Hong Kong involving the Planning Department, Buildings Department and Lands Department is convoluted. It has become increasingly more difficult and time consuming to implement development. For instance:

- i. Each department has different interpretations on development standards on greening requirements and site coverage calculations.
- ii. The planning stage requires very detailed design/ technical information instead of a conceptual plan.
- iii. The technical information prepared for the conceptual plan is incapable of such details currently required in the planning stage. That is to be revised and consolidated in the detailed design stage as per planning approval conditions anyway.

These issues have been reiterated by the various disciplines in the industry, and need to be sorted out for efficient development implementation. Bureaucratic delays add significant delays to housing projects with little apparent benefit.

Q21 Given the acute shortage of housing land supply, are you prepared to accept trade-offs between an appropriate increase in plot ratio to enable more flat production and the possible negative impacts on traffic, population density and the environment?

The additional plot ratio is considered to be better allocated vertically in increased building height instead of horizontally in increased site coverage. The high rise character of the city is generally established and accepted. Further, podium use could be put in the basement to enable more units in place at the same building height.

On the contrary, additional housing in form of increased site coverage, hence reducing open space, which the provision in spite of meeting the minimum Hong Kong Planning Standards and Guidelines, has more apparent impact on the places for recreation on the ground level and the sense of openness at higher levels.

There is capacity to accommodate additional plot ratio on many sites without adverse impact. Increased investment on railways and public infrastructure such as recreational facilities can ensure a high quality of living environment. The attempt to down-zone and reduce building heights over the last 10 years was a misguided attempt to improve quality of living, but has had the opposite effect. A review to increase flat production by increasing plot ratios and building heights is essential, but must be linked to improved public facilities.

The anticipated large number of public housing flats should give due regard to environmental opportunities in greener development. The public housing provider should set target in reaching higher standard in the Beam+.

The moratoriums on Pokfulam and Mid-Levels are out-dated controls and should be replaced by normal planning criteria and lease controls.

Q22 In your opinion, how should the Government strike the balance between development and conservation? What are your views on the various measures to increase housing land supply as set out in Chapter 8?

The plot ratios at New Development Areas are generally low. Whilst New Development Areas are set in wider semi urban context on the periphery of the existing developed area, their core are essentially an urban context and are suitable to be developed at greater plot ratio. This is the case for the established new towns, which were in semi urban context when developed, but have now transformed and been amalgamated into an urban context, not maximising the potential of the land.

Artificial islands in the central waters between Hong Kong Island and Lantau, being considered, are reclamation. Should any reclamation be deemed appropriate, it should be attached to the existing land mass for the future resident's convenience access and easy infrastructure development, instead of in central waters.

Whilst additional land is required to help solve the housing problem, they should not be acquired in the expense of the amenity of the general public.

- i. G/IC zoned lands have been put in place for a reason when the strategic planning was carried out. They are necessary for future sustainable development. G/IC zoned land replaced by housing cannot be readily resumed when necessary. This is particularly so when the minimum G/IC requirement of the Hong Kong Planning Standards and Guidelines do not necessarily respond to local circumstance.
- ii. Rezoning existing deteriorated green belts for development is applauded. However, enforcement should be put in place to ensure that green belts currently in good state are not damaged/ destroyed to expedite rezoning.
- iii. It is common sense, "Owing to the development mode which focused primarily on residential development, it has resulted in residents...having to travel a long way for employment opportunities and necessary community services, thereby compromising their quality of life. (page 126)" Accordingly, "the government may consider relocating some non-residential utilities, such as large scale industrial utilities, to remote areas with a view to releasing the development potential of the urban areas for housing development (page 127)" is not considered an appropriate approach to create land.



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Our Ref.: SHK /LDD 1/ 13
2 December 2013

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By E-MAIL only

Dear Sir/Madam,

Re: Long Term Housing Strategy Consultation Document September 2013

WWF understands the urgent need to address the serious housing shortfall Hong Kong now faces. However, when formulating the long term housing strategy, we believe a more holistic view that takes into account both the broader social needs and the integrity of the environment should be taken to ensure sustainable development in Hong Kong. Indeed the quality of life of the people is tied in with the health of the environment. It is under this context that we would like to express our views and concerns on the captioned Long Term Housing Strategy (the Strategy).

1. Mainstreaming Biodiversity

The UN Convention on Biological Diversity (CBD) was extended to Hong Kong on 9 May 2011 and Hong Kong has the responsibility to conserve our biodiversity as outlined in the CBD. In the 2013 Policy Address, the HKSAR Government has committed to formulate the Biodiversity Strategy and Action Plan (BSAP) for Hong Kong and conservation will be emphasized in major government policies¹, echoing Article 6 of the Convention which requires Parties to ensure that conserving biodiversity is mainstreamed into the planning and activities of all those sectors whose activities can

¹ See Para. 146. 2013 Policy Address. <http://www.policyaddress.gov.hk/2013/eng/p146.html>

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have an impact (positive and negative) on biodiversity². Moreover, biodiversity conservation should be promoted according to the principles and practices of the CBD. WWF views that the avoidance principle and the ecosystem approach³ should be adopted as guiding principles at the early planning stage of large-scale housing to prevent damage to the environment and ecologically important areas.

2. Strategic Environmental Assessment should be required

In accordance with the guidelines set under the Convention on Biological Biodiversity (CBD)⁴, WWF considers a comprehensive Strategic Environmental Assessment (SEA) should be conducted as a decision-support tool for the development of future new towns. The Hong Kong Environmental Protection Department (EPD) has summarized the key benefits of SEA⁵, including:

- serving as a tool for achieving sustainable development, according to the Agenda 21 and the Rio Declaration on Environment and Development agreed at the UN Conference on Environment and Development (the "Earth Summit") in 1992;
- re-framing issues to facilitate sustainable solutions, as SEA promotes early consideration of issues, allowing more rooms for devising sustainable solutions and alternatives which would enhance long term environmental quality;
- early consideration of alternatives, allowing early evaluation of the needs and comparison of different options including a broad range of alternatives well before any irrevocable decision is made;
- avoiding major environmental problems and minimize cumulative impacts arising from multiple projects;
- maximizing environmental benefits and opportunities for facilitating sustainability and significantly improving the environmental quality; and
- facilitating discussions among stakeholders and the members of the public.

Indeed the Strategy should not be merely to increase the supply of affordable housing but in a well-planned and balanced manner that are in line with nature conservation.

² Convention on Biological Diversity. <http://www.cbd.int/nbsap/>

³ Convention on Biological Diversity. Ecosystem Principle 3.

At <https://www.cbd.int/ecosystem/principles.shtml> accessed on 16May2013

⁴ Convention on Biological Diversity. *COP 8 Decision VIII/28*. <http://www.cbd.int/decision/cop/?id=11042>

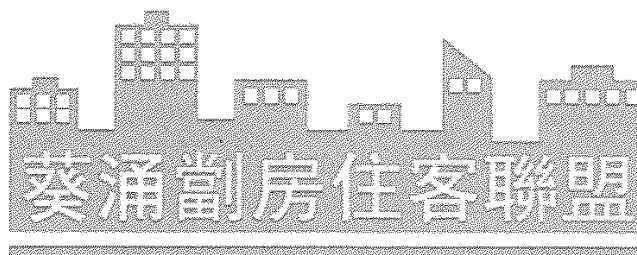
⁵ Environmental Protection Department HKSAR. *Hong Kong Strategic Environmental Assessment Information Kit*. <http://www.epd.gov.hk/epd/SEA/eng/interactive/p10200.html>

WWF considers that urban renewal, redevelopment of old industrial areas, use of brown field sites and more efficient use of land ear-marked for housing (such as Village Type Development) should be first looked at for supply of new housing. We are gravely concerned on the unnecessary urban intrusion to the New Territories (NT) and offshore islands where many remote areas are of ecological importance and highly vulnerable to human disturbance. As such, new housing development should avoid imposing significant environmental impacts directly or indirectly on ecologically valuable areas.

Yours faithfully,

(Signed)

Tony Hung (Mr.)
Conservation Officer, Mai Po Projects



葵涌劏房住客聯盟
房屋政策建議
意見書

「葵涌劏房住客聯盟」是由一群葵涌劏房住客組成，我們一直關注現時香港的劏房問題惡化的成因，公屋興建不足，房屋政策嚴重偏斜及私樓租金不斷上升等問題。本聯盟一直參與本區及聯區有關劏房或住屋相關事務的行動，未來亦會繼續關注劏房問題及倡議房屋相關政策。

香港土地供應緊張，樓價、租金高企，劏房為基層居民提供廉價居所，政府短期內實難以取締劏房。劏房呎價之高昂比豪宅還貴，可是其安全和衛生的水平，卻是低得可憐。不少劏房是廚廁相連、去水渠道錯綜複雜、樓宇及電力負擔遠超於原來大廈設計的負荷、走火通道過於狹窄，更多的是連走火通道也沒有。在香港這個國際繁榮富裕社會，因為政府的房屋政策失誤，基層居民竟然被迫要居於此等單位內，實在令人關注。據統計處資料顯示，以入息中位數計，葵青是繼深水埗和觀塘之後、排第三位的貧窮地區。因此，區內貧乏的 N 無人士及基層家庭一直受到關注。加上葵涌區是一個匯集舊式私人樓宇及工廠大廈的地區，劏房自然應需求而衍生。

就著劏房居民所面對的問題，本聯盟有以下的政策建議。我們希望政府及長遠房屋策略督導委員能確切考慮我們的建議，以舒緩甚至解決基層大眾的住屋問題。

1. 積極增建公屋供應

對政府就如何改善不適切居住環境，聯盟要求增建公屋，並認為「上樓」才是真正解決住屋及居住環境衛生問題的方法。直至本年為止，公屋輪候人數突破歷史新高，有超過 20 萬的輪候家庭，我們認為政府應以兩個 3 年計劃，即總共 6 年，處理這些累積個案，平均每年須建 3 萬多的公屋單位。

為了增加興建公屋的土地，聯盟要求政府把長期放於勾地表而 3 年內沒有被勾出的土地，用來興建公屋。聯盟亦建議政府及不同的非牟利機構，包括市區重建局及香港房屋協會，兩者互相配合於市區找合適的小地盤，並於重建項目地盤興建公屋及不同類型公營房屋，以增加房屋供應量供基層人士入住。

2. 提供長期輪候租金補貼予已輪候公屋三年仍未「上樓」的申請戶

聯盟認為大量基層市民被迫租住劏房是政府過往十年房屋政策失誤所至。政府應兌現「3年上樓」的承諾，對於輪候超過3年而未能上樓的申請人提供現金補貼。建議的補貼形式相等於公屋每月租金與私人市場每月租金的差額，全港以劃一水平發放，為避免業主因應津貼額加租的情況，我們建議政府應按季度發放。另外，政府應繼續透過關愛基金「為居住環境惡劣的低收入人士提供津貼」的方式，向居住於惡劣環境的低收入人士提供援助，並定期進行檢討。

3. 規定加租上限，按尺租作限制

房屋供應不足是政府規劃欠妥的後果。由於2004年修定《業主與租客（綜合）條例》修例後的租務條例未能有效保障租戶，如加租幅度，續租權等。聯盟認為政府應對整項條例作重新檢討，訂明現時租戶續租時租金的加幅，管制亦應針對尺租而非整個居住單位租金，以平衡不同大小單位的分別。

4. 協助改善舊式私人樓宇就大廈的公共衛生情況

不少舊區的私人樓宇以整個單位或分間出租為主，不少業主並非居於該大廈，因此業主立案法團未能有效運作，甚至沒有法團，以致公眾地方的衛生情況十分嚴重，影響生活。聯盟建議政府可協助改善舊式私人樓宇就大廈的公共衛生情況提供支援，並加強對劏房環境衛生的監管，以緩和私人樓宇公眾地方的衛生問題。

5. 改建市區空置工業大廈或建築物，提供合乎衛生和負擔能力的「過渡性房屋」

現時劏房戶面對加租或收購等問題受逼遷，往往難以重覓妥善居所，最後只能搬往另一個劏房或天台屋居住，居住環境難以改善之餘，家庭經濟亦承受不少的壓力。聯盟要求政府改建舊區空置的工廈、紀律部隊宿舍、校舍單位及各種政府建築物以設立「過渡性房屋」，或是在空置地上興建臨時性房屋，盡量利用建築物的資源。過渡性房屋可在現時房屋供應緊張的情況下，舒緩基層的住屋問題，並為租戶提供一個合乎衛生和負擔能力的居住環境。亦可考慮與地區社福團體合作，為「過渡性房屋」住客提供支援服務。本區有不少空置工廈及政府宿舍，實在值得由此方向重新考慮其發展用途。

6. 市建局重建徵收土地後，撥出三成用地興建公營房屋

市建局重建徵收土地，從過往徵回公屋用地於重建後改為私人發展住宅的例子不少，這直接搶奪了公營房屋用地，對基層大眾的住屋供應有很大影響。政府現在經常以缺少用地為名提議開闢其他用地，但實際上則未能有效分配現有房屋用地，甚至偏向大地產商私營發展。建議市建局重建徵收土地後，撥出三成用地興建公營房屋，以解決市區缺少用地的謊言，承擔基層市民的住屋需求。

7. 如要設立劏房發牌，必須先有完善的安置及租務管制政策

在長遠房屋策略督導委員的公開建議中，似乎有意政府研究劏房發牌，規管劏房。雖然此舉無疑能夠改善劏房的衛生與安全問題，但在此之前，租戶必會承受到業主負擔的改建費用，加租無可避免；其次，租客在未能承擔租金加幅時必會面對逼遷等問題。如政府研究劏房發牌，必須要有足夠公型安置單位及完善的安置政策才可推行，否則居民將即時受到規管後租金升的影響。

如有任何查詢，請聯絡葵涌劏房住客聯盟 聯絡人：

楊先生 或 何女士

傳真：

通訊地址：

最後修訂：22/10/2013



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長遠房屋策略督導委員會

就《長遠房屋策略諮詢文件》提交意見

香港基督教服務處(下簡稱「本處」)是一個植根於香港的社會服務機構,多年來致力建立一個仁愛、公義的社會。服務處一直為有需要人士提供適切、專業、真誠的優質服務,對弱勢及被忽略的社群尤為關注,並以「社會仁愛公義、人人全面發展」為願景,為市民及社會締造希望、倡導公義、牽引共融。

本處十分認同政府就長遠房屋策略作出研究,期望社會各界能透過共同參與,對香港的土地使用及住屋需要有具體確切的討論,凝聚共識。特別對於弱勢社群來說,住房上的需要若得到最基本的保障,能安居樂業,對社會的整體氣氛實有正面影響。

本處對《長遠房屋策略諮詢文件》有以下的意見：

1. 命題的意涵

長遠房屋策略諮詢文件的命題是「凝聚共識·建設家園」,若要處理香港的房屋問題,社會確實需要有共識。而共識的重點,非單從技術層面的「建屋量」出發,更重要是社會對「房屋」這概念的理解。現今香港社會,不少人都將「居住問題」與「置業問題」捆綁,再將其統一定性為「房屋問題」。若把兩者分開討論,可能會有另一新角度去面對香港現時的處境。

我們經常會問房屋究竟是需要(needs)還是想要/欲望(wants),住是每個人的基本生活需要,大家都希望安居樂業,因此房屋的最重要功能,是為我們提供安全網,去商品化的公營房屋正好發揮這作用—其使用價值多於交換價值。所以,我們認為政府的責任是為市民提供安居之所,從而滿足市民在住屋上的基本需要和權利,而非置業欲望。透過大量興建公營房屋,縮短輪候上樓時間,好讓市民,尤其是基層市民真正可以安居。

本處認為,房屋問題,須在人權、社會公義的基礎上討論。如聯合國《經濟、社會及文化權利公約》(下稱《公約》)中,於1991年通過的「適足住房權」所述:「適足住房的權利比擁有財產的權利更廣泛,因為它涉及到與所有權無關的權利,並且旨在確保所有人在安全可靠的住所過和平體面的生活,包括無產者。」社會更應討論政府是否真的有責任滿足和處理「需要」以外的欲望,及其相關法定機構在私人市場的參與度是否有調整的空間。

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2. 居住環境（問題3、4、9、21、22）

除了自住居所外，週遭的環境和身處的社區規劃亦為重要。政府並非單純地將人遷住於某社區，更重要是讓人在社區落地生根。社區的環境、規劃及配套設施，有否跟人口分佈和增長而相應調整？當中的規劃和設施，亦須包括教育、醫療、社會福利、交通配套、文娛康體、就業安排等等。例如：老齡化的社區，其醫療需求必較年輕社區大，相反年輕社區對教育設施需要則較多。政府若只依從以往一貫的城市規劃，各社區的配套設施大致一樣，那麼社區設施的需求有可能會被高估或低估。

故此，就諮詢文件的問題21，基於本處對居住環境的理念，本處認為不應籠統地要求社會在居所及其他生活所需上作出取捨。作為一個「適切居所」，除了個人住房需要，其他生活所需及配套亦有其必要性。在作出取捨時，政府須針對個別社區的需要進行研究，顧及該社區承受力及居民的生活需要，不能為增加房屋供應，而忽略居民的日常生活需要。

社區規劃，必須視為「居住環境」的一部份。諮詢文件對於「居住環境欠佳」的界定，主要為處理「劏房」及非住宅大廈住戶的問題。本處明白處理此類住房有政策上的迫切性，亦是計算房屋需求的重要參考，但「居住環境」實應有更廣泛的定義，包含更多範疇。《公約》指出，「適切住房遠遠不止四面牆壁和一個屋頂」，還需顧及「住房保障權」、「服務、材料、設備和基礎設施的供應」、「可負擔性」、「宜居程度」、「無障礙」、「地點」及「文化環境」等範疇。

故此，本處認為，在處理劏房及非住宅大廈住戶的問題的以外，社會應就「理想居住環境」訂立一個更符合人性、更有尊嚴的定義，並致力向此目標邁進。長遠房屋策略，除了住宅量外，亦應在城市規劃及各類配套上，訂出更詳細的願景。除了嚴格執行現有《香港規劃標準與準則》中各類民生需要及規劃要求外，亦應注意按社區環境，在相關的最低要求上作更多的準備，為可預見的人口發展趨勢留下更大調整空間。

3. 社區規劃（問題1、2、4、5）

我們同意長遠房屋規劃以供應為主導，但在實際運作上，政府能完全掌控的，只是公營房屋的供應。除了能主導賣地外，政府沒有理由，沒有權力，亦沒有有效的方法去迫令私營市場在某時段內保證私營房屋的供應。

在未來新增的房屋供應上，本處認同公營房屋應相對私營房屋設一個較高的比例。但香港更需要的，是一個更平衡、更符合民生需要的社區規劃。

以天水圍區為例，政府發展過高比重的公營房屋，卻忽略社區發展應有的平衡，區內居民就業困難、交通不便、社區設施不足，因而引起各類社區問題。市區則有數目繁多的劏房戶，而欠缺公營房屋，如油尖旺區只有一個公屋屋苑。不少弱勢社群居於平均呎價高昂、空間狹窄、衛生欠佳、廚廁共用的空間，個人和家庭都承受著沉重的經濟和精神壓力，受居住環境而嚴重影響個人情緒或家庭關係的個案十分普遍。

有說居於劏房是個人的選擇，大可以租較偏遠，價格較低的地方。事實是，這是他們被迫選擇的。居於劏房的大多是低收入、領取綜援、學歷技能不高的一群，爲了維持基本生活而工作，他們難負擔昂貴的交通費，部分更要遷就不定時的工作時間而被迫選擇居於就近地區。再看，在住屋需求非常龐大的現實下，劏房租金不但居高不下，更一直攀升，莫說油尖旺、佐敦這些市區，就連深水埗、元朗、荃灣等地區的劏房租金亦同樣高昂。根據政府委托獨立顧問進行的《香港分間樓宇單位的調查》，選擇居於劏房的最主要原因是「方便返工/返學」，佔接近65%；而可負擔性及經濟困難，各只佔不夠五成及大約二成五。可見收入差距，並非最大的劏房存在因素，反而是社區規劃上出了問題。基於此實際需要，在未有完滿安置政策或公屋供應下，取締現有劏房，將等於變相把現有居民迫遷到其他劏房；規管亦應集中於安全層面，而非以發牌或登記方式變相把此類居住環境欠佳的住房合理化和制度化。

本處認爲，沒有平衡的發展元素去規劃我們的長遠住屋需要，只會製造不同的社會問題，加深社會矛盾和衝突。劏房的存在，存在很卑微的實際需要，要解決問題，不在取締及規管，而要在源頭上增加市區基層住屋供應。

更甚者，作爲一個負責任的政府，解決市民公營房屋的「居住問題」，比處理社會的私營房產的「置業需要」更重要。除了在新建房屋中增加的公營房屋比例，亦應檢討不同社區的公營房屋比例需要，在賣地及公營房屋的需要作取捨，以追求更平衡的發展，滿足社區各類住屋需求。

4. 建屋的責任（問題19）

現時房屋的興建，主要由私人發展商及政府進行。在政府的層面，除了房屋協會及房屋委員會外，市區重建局作爲一個法定組織，在長遠房屋規劃中亦擔當相當的責任。其官方網頁中清楚表明市區重建局會以「以人爲先、地區爲本、與民共議」的方針去推進市區更新；解決市區老化，協助居民改善其生活環境；推動可持續發展，建設一個優質城市。可惜，我們見到的市區重建局卻成爲製造貧困、發展不公義、擴大社會矛盾的幫凶。《市區重建局條例》（下稱《條例》）賦予的權力下，市區重建局打著爲政府收樓、重建舊區、發展理想規劃的美麗旗幟，在舊區收購一棟棟的舊樓。無奈，原居於舊區的居民未必有能力負擔新的住所，一班弱勢的租客被迫遷出原居，代價往往是搬遷到更高租金、更狹窄、更偏遠的住屋環境。更可怕的是，重建後的樓宇價格連中產亦未必能夠負擔，建築設計不實用得遭人垢病，更遑論有可容納一班弱勢租客的地方。

市區重建局作爲《條例》保護下的法定機構，其資金來源除了營運所得外，亦可以在立法會同意下得到政府撥予的資金，及在立法會同意下有政府作爲債項的擔保，更保障了其豁免納稅的地位。在如此背景下，本處希望政府加強市建局作爲法定機構的社會責任，不應拿著政府的資源去打劫貧民，協助富裕。政府應立即檢討市區重建局的責任和工作，在舊區重建所得的土地規劃上，要以興建公營或資助房屋，以發展「讓中產家庭上車」的住屋爲首要原則。

5. 長者住屋（問題6、11）

諮詢文件提及要發展「中、高收入長者住屋計劃」，由於現時政府及社會各界未能提供足夠數據或顧問報告，在沒有具體資料下，一些並非建基於理據的建議，實非合宜。本處認為當局應就此展開研究，鋪陳數據，讓社會在有理有據下達致共識。建議政府應從使用者的需要著手，從評估中了解社會對此類住屋計劃的需求，訂出具體發展方向。

正如本回應書第一節「需要」或「想要」的理念，此類中、高收入長者既然有較高的經濟能力，就自然有較大的空間能夠從私人市場取得服務。對中、高收入長者而言，此類計劃只會讓他們在眾多適切居所選擇之下多一個選項，但相反低收入長者，則是「不適切住屋」及「適切住屋」之別。因此，中、高收入長者住屋並非香港的最大需要，亦沒有即時需要。反之，對於未有公營房屋保障的低收入長者而言，在有限的租金負擔能力下，除了透過減省其他開支外，就只能以同樣租金遷往其他地方，甚至由原本的「適切住屋」遷到「不適切住屋」。在資產快速減少下，最終仍無可避免地需要公營房屋的支援。故此，本處認為，政府實應首先處理低收入長者的住屋需要（needs），探討各種為低收入長者提供適切住房的可能性，而非為中、高收入長者在現有市場下再提供多一個選擇。

除了最迫切的低收入長者住屋需要外，香港需要加快設計及發展成一個適合長者居住的友善社區。根據統計處的資料，65歲及以上人口比例將從2006年的12.5%上升至2036年的27%。面對長者龐大的需求，現時的各樣配套設施已不能負荷，除了從住屋上幫助長者外，更應增建長者居家安老的設施，及醫療、交通、社區休憩設施等等。

可惜，諮詢文件並沒有特別提及任何低收入長者住房的建議，只建議房委會繼續現有服務。這些現有的服務，就是高齡合資格長者一般需等候兩年才會獲第一次編配公屋單位，亦不見任何計劃中以低收入長者為主要對象的住屋計劃。本處期望當局能解釋為何只建議「繼續現有服務」，卻沒有長遠地為低收入長者提出任何實質性、數量性甚至方向性的願景。就本次諮詢所欠缺的一環，本處認為，政府應獨立地為低、中、高收入的長者需要——這未來佔香港三份一人口的組群，在包括安居、醫療、社福、釋放勞動力等的各個層面上，作一次全盤的研究和諮詢，而非散落在《長策》去諮詢房屋問題、《退保》去諮詢安全網及生活保障問題、《人口政策》去諮詢廣東省養老、釋放勞動力問題。

6. 租金問題（問題14）

在處理租金負擔的議題上，諮詢文件只否定各項建議，卻沒有提出任何實質有關紓緩租金壓力的可行方向。近年，租金急升，根據統計處資料，居住在私人單位而月入一萬元以下家庭，租金與收入比率中位數為41.2%，月入一萬至二萬家庭的比率則是31.1%。中位數，即當中有一半家庭的租金與收入比率，高於41.2%及31.1%。如此巨大的居住開支，換來的卻是狹窄卑微的生活空間。高比例的必要性居住開支，大大壓縮市民日常生活、醫療、儲蓄、進修、娛樂的其他正常需要，在心理上、家庭關係上都做成極大壓力。社會就此需付出的社會成本（social cost），遠高於不同紓緩租金政策的開支或其產生的影響。

回顧政府於2004年取消租管的原因：住宅供應增加、租金下滑和公屋輪候時間縮短。時至今天，當年景況已完全轉變--供應不足、租金高企和公屋輪候時間長--當年取消租管的理據，亦應能成為今天任何紓緩租金壓力方案的理據。在低收入家庭的巨大需求，以及能負擔住房的選擇極有限下，租客議價能力實際上已大幅下降。在這不公平、業主與租客之間的議價能力失衡之情況下，政府更應為有實際需要的一群，積極制定措施，促使市場回復平衡，而非為租金或投資的需求及欲望去護航。在考慮租金紓緩政策時，政府應積極參考世界各地有效做法，考慮各項的可行性，引入租住權管制，甚至是租金管制。

根據Global Property Guide資料，有超過40個國家或地區設有任何形式的租金管制，包括美國、加拿大、歐洲15個國家、台灣等，當中有17個國家或地區的經濟總量排世界頭50位。各類型的租管已有多年的歷史，政府絕對有足夠資料及理據去借鏡其他國家已實行的措施，以不同方法去改善業主租客不平等的權力關係。例如，政府可同時設立租金券、租金管制，及要求市民直接支付其水電煤等開支，以免業主以其他方式變相加租；在紓緩基層租金壓力的同時，亦能管制業主訂定租金水平的升幅，又可考慮把管制範圍限於某類年期或價值的住房，及紓困對象設為輪候公屋年期超過某時段的對象。此等補貼及管制，需多管齊下才能有效讓基層租客得到應有的保障，單一的補貼或管制，最終只會令有較大權力的業主一方得益，無助改善弱勢的環境。

結語

房屋政策，作為一個對廣大市民影響深遠的發展策略，開展是次諮詢是一個好開始，能讓社會認清事實，凝聚社會共識。期望藉著此次諮詢，除了能收集到社會各界就當局所關心課題的回應外，更能發現更多新思維，不片面地把房屋單一地視為「量」的議題，以一個整全發展的概念，建設一個讓所有香港市民能生活得更尊嚴的城市。

總幹事 孫勵生

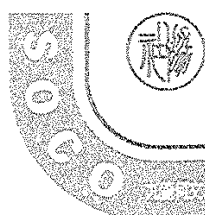
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香港社區組織協會
對長遠房屋策略督導委員會諮詢文件
立場書

香港特區政府於 2013 年 9 月 3 日公佈長遠房屋策略諮詢文件（下稱「諮詢文件」），詳細分析本港房屋問題、推算房屋供應、以及提出各種房屋策略的措施。

因應社會對長遠房屋的需求，香港政府曾在 1987 年及 1998 年先後推出兩份長遠房屋策略文件，以制訂未來房屋供應政策。當時隨著新政策出台，房屋供應得以大幅提升，以配合市民日漸增加的住屋需求。可是，自 2000 年八萬五建屋目標被擱置、以及 2002 年政府宣佈多項穩定樓市政策後，當時的長遠房屋策略正式告吹。政府一直未有再啟動任何長遠房屋策略，結果對公營房屋的供應策略缺乏合理需求推算的基礎。尤其政府於 2002 年宣佈停止興建居屋，及後每年僅維持平均興建 15,000 個公屋單位，公屋輪候冊數字日益增加、輪候時間延長，繼而中小型單位的租金及樓價持續高企，直接造成今天割房遍地開花的局面。

根據聯合國人權宣言，房屋是屬於人權的一部份。要達致真正的房屋權，有數項元素需要包括在內：

1. 固定、安全的居所
2. 可負擔能力
3. 取得合適居所的機曾
4. 可居住程度
5. 參與掌管居住情況
6. 選擇居住地點和方式
7. 反對任何歧視

但現實上，從房屋權所見，租住不適切居所單位的居民，根本未能體現以上權利之彰顯。根據本會《2012/13 籠屋、板房及套房研究報告》顯示，分別有超過八成、及近六成受訪者認為住所有環境衛生、以及設施問題。受訪者單位面積中位數僅 40 平方呎，面積小且缺乏私隱，平均超過 8 個人共用廚房、洗手間等設施，並未能體現可居住程度上所指健康的家庭生活。研究亦顯示，租金佔入息比例中位數達 27.69%，數字與之前政策二十一調查結果有相若情況（當時租金與收入比率中位數為 29.2%）。在本會調查中，除半數受訪者需動用超過 1/4 收入去繳付租金外，超過兩成受訪者更以四成或以上入息用作繳付租金，反映單位之租金根本遠超負擔能力，不但高於所有住在私人住用單位的租金與收入比率中位數(25.7%)，且環境更未如理想。再者，租客缺乏租金管制及租住權保障，現在私人租務市場高企情況下，隨時面對加租及逼遷壓力。《2012/13 籠屋、板房及套房

研究報告》顯示，有 44.5%受訪者在過去 2 年內曾被加租、有近 2 成受訪者 3 年內被逼遷，反映租客根本毫無保障，居住場所極不穩定，租金之高使基層租客選無可選。以上所見，現實情況不但未能體現房屋權的保障，居民更要每天提心吊膽，擔心安全、租務逼遷等問題。身為租客，在租務條例上，租客一方往往處於劣勢，毫無議價能力，更莫論參與居住情況的可能性。對於輪候公屋，雖然只要符合資格就可以申請公屋，但輪候時間隨時遠超三年，取得適切居所困難重重，故導致居民只好鍋居在不適切居所之中。最後，非長者單身人士自 2005 年實施配額及計分制後，被排拒於一般輪候隊伍 3 年上樓承諾之外，故變相遭到房屋署不公平的對待，上樓遙遙無期。以上種種，均反映房屋權在基層市民生活上未能彰顯，香港多年來房屋政策失效，使市民房屋權受到嚴重打擊。有見及此，要真正體現房屋權對市民的保障，政府務必提出清晰的房屋目標以及未來建屋目標，以糾正多年已來積漸的房屋問題。鑑於多年來缺乏長遠房屋策略，對未來房屋供應毫無周詳計劃，導致數年來房屋供應未有針對社會大眾的住屋需求，嚴重影響香港市民安居樂業的意願。

2012 年新政府上台後，隨即宣佈設立長遠房屋策略督導委員會(下稱「長策會」)，制定未來 10 年房屋供應策略。長策會表示，未來 10 年將訂下 470,000 的總房屋需求，並建議落實一系列政策，包括優化 45 歲或以上計分制、插針式公屋、劏房發牌規管等。有關建議將會對未來 10 年房屋供應起關鍵性作用，尤其影響一眾居住在不適切居所的低收入住戶，故本會對是次諮詢文件意見如下：

(一) 房屋目標制訂未盡全面

要訂下未來房屋供應策略，房屋目標將會提供重要基礎及方向。對比 1987 年及 1998 年對基層市民的房屋政策目標：

1987 年	1998 年	2013 年
長遠房屋策略政策說明書	長遠房屋策略白皮書	長遠房屋策略諮詢文件中，根據《二零一三年施政報告》房屋目標
確保以市民能負擔的樓價或租金，為所有住戶提供適當的房屋	三項具體指標承諾，包括(一)每年興建不少於 85,000 個公私營房屋單位、(二)全港 70%家庭擁有自置居所、以及(三)輪候租住公屋的平均時間縮短至 3 年	協助基層市民「上樓」，滿足基本住屋需求

與 1987 年文件最大的分別是，2013 年諮詢文件房屋政策目標，是通過協助基層市民上樓，以滿足住屋需求。但目標上未有交代在市民上樓前的過渡期間，政府如何協助基層市民解決不同種類住屋需求，而僅提供終極目標。

在 1987 年的文件中，有強調要確保市民能負擔樓價之餘、亦能負擔租金，顯示當時政府有決心介入樓市以及租務市場，但今次諮詢文件則未有承諾要維持

租金在可負擔水平。至於 1998 年白皮書方面，當年更許下三大具體指標，以作為達到政策目標的根據，反映政府大刀闊斧解決房屋問題的決心，圖通過政府介入，改善市民居住情況。

誠然，對於基層市民而言，上樓為居民一大願望。可是，由申請至入住公屋，不少居民輪候期間遠超 3 年。根據房屋署針對 2013 年 6 月底之數據，對輪候冊申請人的安置情況所進行的特別專題分析，發現當時輪候冊上 118,700 個一般申請中，有 16%，即 19,200 戶輪候時間為 3 年或以上，較 2012 年 15% 嚴重。房屋署曾根據 2013 年 6 月底數據對輪候冊申請人的安置情況所進行的一個特別專題分析：

	百分比	戶數
輪候時間 3 年至少於 4 年	56.3%	10,800
輪候時間 4 年至少於 5 年	32.8%	6,300
輪候時間 5 年或以上	10.9%	2,100
總數	100%	19,200

該 19,200 戶申請者中，約 56%(10,800 戶)輪候 3 年至少於 4 年、約 33%(6,300 戶)輪候 4 年至少於 5 年、約 11%(2,100 戶)輪候時間為 5 年或以上。從以上數字所見，超過 19,000 戶申請戶已輪候公屋 3 年或以上，反映 3 年上樓其實並未全面在一般輪候冊上涵蓋，而數字尚未計算非長者單身人士，結果不少市民多年來需要繼續蝸居在不適切居所單位之中。再者，比較 2012 年結果所得，除輪候 3 年或以上人士整體人數及所佔比率有所上升外，值得注意的是，輪候 4 年至少於 5 年的百分比大幅上升，而 5 年或以上人士亦同樣有所增加，故預計未來上樓情況只會進一步惡化。所以長策會以上樓作為終極目標，而未有著墨於其他配套措施上，根本未能急市民所急，協助基層市民度過難關，難以說服市民政府對解決房屋問題的決心。

現在無論租務市場抑或置業市場均遠超市民負擔，民怨四起。有見及此，一份針對現況的長遠房屋策略，政府實有必要除公營房屋以外，再作其他措施配合，包括政府應主動撥亂反正，確保租金及樓價控制在可負擔範圍、並加上各項具體指標以作配合，而非單一地純以供應(尤其公營房屋)作為主導，容許私人市場繼續不健康地發展。可是，在今次諮詢文件中未有交代有關目標，令人失望。

(二) 推算方法未有計算公屋輪候冊以及資助房屋所反映有需要住戶的數目

是次文件表示未來十年將會供應 470,000 個單位，當中公營與私營房屋分別佔 6 成及 4 成，即資助房屋(包括公屋及居屋)約有 282,000 個單位。長策會推算未來房屋供應數字的基礎，主要為一、住戶數目淨增長；二、受重建影響的住戶；三、居住環境欠佳的住戶；及四、其他類別(包括空置單位、非本地學生)，最後經空置單位數目調整後，因而得出未來十年供應量介乎 44 萬至 50 萬之間，供應目標的中點數為 47 萬，並以此為目標。

回顧 1987 年及 1998 年兩份長遠房屋策略文件中的房屋需求推算方法如下：

	1987 年	1998 年	2013 年
	長遠房屋策略政策說明書	香港長遠房屋策略白皮書	長遠房屋策略諮詢文件
1.	一九八五年尚未滿足的需求	現有家庭需要適當居所的數目	住戶數目淨增長
2.	新組成家庭的需求淨額	新增家庭需要適當居所的數目	受重建影響的住戶
3.	拆卸私人樓宇所造成的需求	新增的房屋需要	居住環境欠佳的住戶
4.	重建計劃	住戶房屋需求衍生率的系數以及每年容差量	其他類別
5.	-	-	根據私營市場空置單位數目作調整
建議興建量	每年平均超過 7 萬個公私營單位	每年平均 8.5 萬個公私營單位	每年平均 4.7 萬個公私營單位
公私營比例	公營：57% 私營：43%	公營：55% 私營：45%	公營：60% 私營：40%

分析三次長遠房屋策略的推算方法，會發現三次推算方法的最大不同之處在於現有住戶對房屋需求的因素。1987 年的推算方法考慮了「一九八五年尚未滿足的需求」，即原先政府承諾但未能預期趕及完成的興建量、以及同期其他尚未滿足的住屋需求，最後單是計算該部份提供 380,000 個單位。同樣，1998 年的推算方法亦考慮了「現有家庭需要適當居所的數目」，即有考慮當時的住屋需求，而推算出有關數字。

然而，是次諮詢文件的推算方法並沒有像過去的推算方法，加入現有住戶房屋需求的因素，反而只著重淨新增的房屋需求。換言之，只有對未來十年新增的需求估算，但未有對之前未滿足的住屋需求作出任何修正及評估。事實上，對上一次長遠房屋策略出台已為 1998 年，但自 2002 年政府宣佈一系列新房屋政策後，整個長遠房屋策略未有上回軌道，結果日積月累下，出現供求嚴重失衡的情況。

以出租公營房屋為例，截至 2013 年 6 月為止，現時輪候冊上共有 234,300 個輪候個案，他們對公屋的需求至今仍未被滿足，但同樣沒有被納入是次推算範圍之內。

	公屋輪候冊總數	距離上一年度增加數目
2009	114,400	2,800
2010	129,100	14,700
2011	152,400	23,400
2012	189,500	37,000
2013 年 6 月	234,300	44,800

從上表顯示，近年輪候冊數字屢創新高，近5年內增加一倍，反映住屋需求驚人。單是計算2012/13年度，公屋輪候冊新登記宗數已達61,600宗。單是由2009年至2013年6月的5年間，距離上一年度的輪候冊增加數目有進一步惡化趨勢，即使長策會建議每年興建約23,000個公屋單位(因為每年預計興建5,000個居屋單位)得以落實，數字仍然追不上新增數字速度，故建議根本未有考慮現在輪候冊的實際輪候情況。

	新單位	翻新單位	編配總數
2009/10	18,500	18,400	36,900
2010/11	12,600	18,500	31,100
2011/12	18,500	14,800	33,300
2012/13	18,750	13,750	32,500
2013/14	21,600	12,000	33,600

上圖雖顯示，如合計翻新單位數字，近五年可編配數目平均每年超過30,000個。可是，並非全數公屋用於輪候冊上，當中包括如重建項目及調遷事宜。以2013/14年度為例，33,600個公屋單位中，只有24,020個單位預留給公屋輪候冊申請人。從數字中可見，編配數字遠遠追不上公屋輪候冊新增宗數。最終，只會繼續加重房屋署平均三年上樓承諾的壓力，而最大受害者正是苦候公屋的一眾基層市民。所以本會認為，整個推算方法未有考慮現存輪候冊住戶所反映的公營房屋需求，並漠視多年來公營房屋追不上市民需求的現實，而嚴重低估未來十年的房屋供應量。

除出租公屋外，居屋自2002年宣佈停建後，整個置業階梯被中斷，基層市民只好選擇租住公屋、而其他收入人士則只有選擇購買或租住私人市場的單位。故本會認為，尚未滿足的需求，同樣包括一眾有意欲置業的人士。之前政府曾推出置安心計劃，結果反應十分熱烈，出現認購超額逾50倍的情況。而之前政府亦有推出白表免補地價購買二手居屋計劃，同樣反應踴躍，超額認購達11倍，即兩方面對資助房屋需求亦有超過5萬申請人次，可見多年來對自置資助房屋的需求甚巨，但政府向來未有積極回應訴求。近年置業市場被嚴重扭曲，未有充足經濟能力的市民只好放棄置業的念頭，甚至不敢輕舉妄動。故本會認為，多年來積存對資助房屋的需求，完全未有反映在推算之中。屆時約每年5,000個資助房屋單位推算，僅屬杯水車薪，難以滿足居民需求。所以政府所謂的供應主導，亦不足以滿足市民的住屋需要。

所以，無論出租公屋抑或資助房屋，整個推算未有涵蓋現存需求的數字，變相嚴重低估房屋總供應數字，而居民只好無奈繼續接受貴租。

(三) 政策減慢住戶數目淨增長速度

自2005年引入非長者一人配額及計分制後，公屋每年配額最多僅2,000個。結果，現在輪候冊累積115,600宗非長者單身申請。這些非長者單身既可能居住於不適切居所之中，但亦可能與其他家庭成員居住於狹小單位之內。根據房委會資助

房屋統計調查（文件編號：SHC 60/2012）顯示，非長者單身申請人中，85%並非獨居，接近一半居住於私人樓宇及其他類型樓宇。

可想而知，這些非長者單身因非長者一人申請配額及計分制實施後，需要輪候更長時間，才能自成一家人，成為新增住戶。分析過去五次人口普查數據顯示，一人住戶的淨增長率由1996及2001的16%及4.4%攀升至2006的27.2%，其後回落至2011年的9.9%。由此可見，房屋政策壓抑了住戶數目的淨增長速度。

另外，居於私人房屋中的一般輪候冊的申請住戶，有29%與其他家人同住，在獲配公屋後便會與同住家人分戶。過去一段時間，由於公屋供應量不穩定，導致申請住戶獲編配的時間延長。同樣，由於政策因素，這些現時與家人同住，一旦獲配公屋後便會成為新增住戶，其增長相對減慢。

諮詢文件的推算方法，正是只計算住戶淨增長的數目，因而得出未來十年每年約有29,400個新增住戶。不過按上述理據，淨增長的數目會因為公屋的編配及供應政策所壓抑。因此，現時每年29,400的推算數字可能低估了實際需求。

（四）一人住戶房屋需求被忽視

諮詢文件建議優化非長者一人申請配額及計分制，即讓 45 歲或以上的非長者單身人士優先上樓。雖然此舉有助改善以上年齡群組的上樓時間，但在配額制下，卻變相更大力度壓抑年輕人士上樓機會。事實上，根據統計處數字，一人住戶佔整體香港住戶的百分比不斷上升，2011 年，有關百分比為 17%。同時，一人住戶的增長率接近七成（1991 年的 238,642 戶增加至 2011 年的 404,088 戶），高於整體住戶接近五成的增長率（1991 年的 1,582,215 戶增加至 2011 年的 2,368,796 戶）；但現在無論公屋或之前的置安心計劃，均只分別編配最多 8% 及 10% 的單位予非長者及單身人士。由此可見房屋策略未能追上現時住戶特徵的轉變趨勢，整個一人住戶需求因而被壓抑，未能反映在是次推算之中。

（五）低估因重建而引起的房屋需求

舊區私人樓宇重建主要對象為樓齡超過五十年的舊式大廈，可是有關樓宇實為劏房的重災區，不少單位已轉營為多個劏房單位，所以面對重建時，業主固然存在對新增住屋的需求，但同時租客亦因會面對逼遷，而增加房屋需求。在諮詢文件中顯示，市建局在 2010-11 至 2012-2013 年度開展的市區重建項目中，平均每個被拆卸的私人單位中，約有 2.2 個住戶居住，而得出共 39,600 個重建下房屋需求推算數字。但事實上，如果根據《香港分間樓宇單位的調查》，當時結果顯示有分間樓宇單位的屋宇單位平均分間了 3.6 個小單位，遠高於 2.2 個住戶的數字。所以，如果以每個分間樓宇單位平均分間 3.6 個單位作考量，則重建項目將會達到 64,800 個單位數目，即增加超過 2 萬個單位。故本會認為，有關數字僅以過往開展的項目作計算，樣本未足以反映舊型唐樓分間樓宇數目的嚴重性，有機會低估重建時所面對的住屋需求。

此外，近年市建局收購行動及其他重建項目愈趨頻繁。如果根據屋宇署資料

顯示，由 2009 年起十年間，每年平均會約有 570 幢樓宇到達 50 年樓齡，並由 2009 年約 4,000 幢樓齡超過 50 年的樓宇，到 2019 年增加至約 9,500 幢。雖然長策會表示有關樓齡達 50 年的樓宇所涉及重建情況。但截止 2009 年，已達 40-49 年樓齡的樓宇已達 5,712 幢，未來將會愈來愈多樓宇踏入 50 年或以上樓齡。市建局 2011-2012 年報有提及過大部份在上世紀 50 年代建成的住宅樓宇因建築質素不佳，而設計壽命亦只有 50 年。而當時 50 年的舊樓之中，其中三千多幢更屬失修或明顯失修，令人擔心再有嚴重傷亡事件發生，故維修及大型重建項目預期會接踵而來。市建局 2010-2011 年報中顯示，當年市建局開展的 54 個重建項目，已涉及 825 幢破落樓宇。另外，隨強拍條例自 2010 年修訂後，由 2010 年全年強拍申請只有 21 宗、增至 2011 年至 46 宗，2012 年更達 57 宗，雖然本年度自買家印花稅後強拍情況有所減少，但面對樓宇老化的問題卻並未有解決。故未來重建的步伐、以及隨樓齡對樓宇安全結構造成的影響，將會嚴重影響房屋供應及需求數字。故本會認為有關推算方法並未有切實考慮因香港樓宇安全，所帶來的房屋需求影響。故本會建議政府應重新分析 50 年樓齡或以上樓宇的分間樓宇單位數目以及樓宇安全，再作評估及推算重建的速度所帶來住屋需求的影響。

（六）公私營六四比例的根據

是次文件中，建議未來十年公私營比率為六四比，即公營房屋所佔比率較高。如果比較近數年公私營房屋實際興建量，確實有存在過公營房屋所佔比率達六成或以上的情況。可是，文件中未有特別提及有關六四比的依據，此舉卻令人有所擔心。以 1987 年及 1998 年 2 份長遠房屋策略為例，當時公私營比例全從需求以作評估。在 1987 年的文件中，有評估如果當時房屋政策不變下，公屋可能出現供過於求，居屋則求過於供，而私營機構資源則未有充份運用。故在修訂策略後，一併處理重建屋邨等計劃，方決定平均每年分別公私營興建量。而在 1998 年文件中，有以住戶的入息及住屋意願作為運算上依據，並把各個類別的房屋需求量乘以入住公營或私營房屋的比率，以將兩類房屋的需求量劃分出來。相比起今次諮詢文件訂下的六四比例，不但從公營房屋數目中未能滿足現時輪候冊需求，而置安心項目等過去經驗亦反映資助房屋出現超額需求。可是，即使公營房屋佔達六成之比，但當中該近廿八萬的公營房屋建屋量同時包含公屋、以及每年不少於五千個的居屋單位。雖然長策文件認為有關建議具彈性，可因應市場情況而決定公屋或居屋的數目。但如果將兩種針對不同對象的住屋類型捆綁在一起，卻反之導致公屋及居屋在用地需求上互相競爭，並將公屋輪候戶及居屋輪候戶同時置於一個對立面上，互相爭奪資源。所以，本會擔心是次六四比之計算方法是否有足夠依據，委員會應客觀考慮經濟環境情況、購買能力、公私營置業需求、公私營機構資源運用等，去處理香港現存的房屋問題。

(七) 缺乏租金管制，加租逼遷不絕

諮詢文件指如果推出租金援助會令租金上升、並令更多市民輪候公屋；另一方面，又指租務管制將會令新租客拒諳於市場。事實上，當年政府之所以引入租金管制，原因主要是用作紓緩私人租住單位的嚴重空缺情況。後來政府表示，因受管制租賃的租客所繳交租金佔入息比率方面，較受《業主與租客(綜合)條例》第IV部保障的租客所繳交比率為低，故政府有感業主利益因而受損；再加上租金管制發展至1998年，全港只剩下約15,000個單位受管制租賃，約佔全港私人住宅樓宇的1%而已。由於當時市值租金與受管制租金差距收窄，加上受影響住戶只剩下約18,000個家庭，所以當時認為解除租金管制不會令租客有太大的負面影響，故而在1998年解除租金管制，並於2004年，因當時住宅單位的供應量充足，而租金水平有下跌跡象而撤銷租住權保障。

可是，今時今日情況如往年已經大為不同。在房屋政策方面，政府多年僅維持興建公屋15,000個單位，亦停建居屋多年，與當時政府打算在房屋政策上大展拳腳成強烈對比，結果引致現時公屋輪候冊數字屢創新高，而單位卻出現供不應求的情況，最後導致租金遠勝當年的局面。根據差餉物業估價署數字顯示，截止今年7月，租金指數達154.7，創歷史新高。而今年私樓租金指數亦較5年前上升26.5%，反映租金加幅的嚴重性。事實上，諮詢文件亦有表示，小型單位的租金升幅遠高於整體升幅，對於基層人士負擔至會更為吃力。數字亦有顯示，居住分間樓宇單位的租金佔入息比率相比一般市場更高，尤其現在劏房大行其道，反映房屋供應緊張，故與昔日撤銷管制之背景盡然不同。政府即使有承認增加房屋供應方為解決方法，但卻完全漠視現實情況，即現在居住於不適切居所的一眾居民的苦況，他們每年均擔心因加租及逼遷所帶來心理上、以及經濟上的沉重壓力。

現時市面單位供應不足，是多年以來房屋政策失當所致。政府繼續迴避問題，反指擔心會導致更多市民輪候公屋、租金上升、對新租客構成影響等，而不願作出任何實質建議及承擔，令人遺憾。事實上，基層市民如果通過入息及資產審查，申請公屋也是合理非常，不應以此作為拒絕發放租金津貼的理由。再者，發放租金津貼會否帶來租金上升也是極具爭議性，但不得不考慮，現時居民面對高昂租金，升幅遠超收入增幅以及通脹，只好節衣縮食，生活在水深火熱之中，政府絕不應該坐視不理，拒絕提供租金援助，減輕有關開支。無可否認，有關管制有機會影響一眾新租客，但現存數以萬計的租戶卻可因而即時獲得保障，這點亦不能忽略。故政府應積極面對問題，在長遠興建更多公屋的前提下，同時制訂管制，務求在過渡期間改善民生，讓租金不至於可以繼續瘋狂上升。

(八) 調整配額及計分制，進一步削弱35歲以下人士上樓機會

雖然諮詢文件打算「優化」計分制，讓45歲或以上人士優先上樓，並逐漸推廣至35歲非長者單身，但在配額制未有大改動或撤銷情況下，此舉會將35歲以下人士的上樓機會進一步削弱，上樓無期。原因是自配額及計分制成立以來，從未有30歲以下人士透過配額及計分制獲編配公屋。以2012/13年度為例，該年

獲編配公屋的宗數只有 1,690，當中 50 歲或以上佔約 1,170 宗。數字其實已經反映，在現行制度下，年紀愈大單身人士，所佔編配額愈多。所以長策會建議的「優化」制度，加分作用效果其實並不顯著，因為本來年紀較大人士已佔上樓大多數，今次建議只會進一步堵塞 45 歲以下的單身人士上樓機會。所以，配額制才是整個對單身人士上樓最具影響力的核心部份。故短期內應大幅調高配額數字，逐步將非長者單身人士納入 3 年上樓承諾，以至達致最終取消配額及計分制。

(九) 缺乏對其他住屋類型的討論及建議

鑑於 3 年上樓未能全面達到，在輪候公屋的期間，市民依然面對貴租，並只有繼續在市場中租住私人單位，缺乏其他選擇。此外，現時輪候冊達超過 23 萬戶申請人，而未來 5 年的公屋興建量亦預期只能定在約 79,000 個單位，所以儘管長策建議未來 10 年供應量最終落實，但近 5 年的房屋問題根本未能觸及。故中短期內的過渡性房屋選擇，包括興建宿舍，可讓市民多添選擇，作為輪候時期減輕經濟壓力的其中一個方法。可是，在今次諮詢文件中，宿舍計劃完全欠奉，僅集中於公營房屋及私人樓宇，而未有同時針對中短期住屋策略，使整個房屋政策未能全面妥善。

青年宿舍

首先，文件有傾向將 45 歲或以上的單身人士上樓問題優先處理。但之前民政事務局在青年宿舍的定位上，則傾向於 30 歲以下青年，圖將不同年齡層的人士分流處理，以應付其住屋需求。結果，30 歲至 45 歲以下單身人士，既未合資格申請青年宿舍，亦隨時會因計分制度改革，有機會進一步拉長輪候時間。事實上，根據本會《非長者單身人士住屋需要研究報告 2013》結果顯示，非長者單身人士的租金連水電費用佔入息比例中位數達 35.49%，租金負擔十分沉重。35 歲以下受訪者每月收入中位數亦只有 \$6,900，有超過三成受訪者租住在套房、亦另有超過三成居住在板間房/梗房單位，單位呎數中位數更只有 40 平方呎，所以不少 35 歲以下受訪者同樣生活在貧窮，故不應該一刀切將所有 35 歲以下人士排除在需要幫助的行列之外。

青年宿舍當初計劃會興建共 3,000 個宿位，但至今只表示未來數年只能提供 270 個宿位，所以數字根本未能滿足需求。再者，青年宿舍更加入魔鬼條款，即入住青年宿舍的非長者單身人士，要放棄公屋申請。結果，宿舍未能發揮橋樑作用，只會將宿舍對象進一步收窄，無助解決基層單身的房屋問題。

單身人士宿舍

除青年宿舍外，面對市面租金高昂，現存僅有兩幢提供 580 個宿位的單身人士宿舍，但供不應求，致使申請人需要輪候超過 3 個月時間，故宿舍一路未能滿足大眾所需要求。

其他住戶組合

現存制度上，家庭的住屋需要未有包括在宿舍計劃之內，故只有公屋作為唯一選擇。但在輪候期間，其他支援欠奉，致使不少基層家庭只好蝸居在不適切居

所單位之中。所以如何協助有關家庭解決入住公屋前的住屋需求，相信宿舍亦可供作考慮。但在長策會文件中，只表述公私營房屋的興建，但未有提及如何與民政事務總署及民政事務局等部門合作，以完善整個房屋制度，提供公屋以外的宿舍作選擇，令人失望。

工廈改建

除提供宿舍外，本會亦有提倡將工廈改建，以提供更多房屋供應，以作過渡安排。雖然長策會文件並未有完全排除將合適工業用地改劃作住宅用途的可能性，但文件並未有用較多篇幅去討論工廈改建。事實上，現時不少位處商貿地段的工廠大廈可作重建或翻新用途。故本會希望政府及長策會重新考慮及研究，改變部份環境較安全的工廈改作住宅用途的可能性，以為基層人士提供多一個廉租單位的選擇。

(十) 劏房發牌制度引起的問題

長策會有建議全面發牌規管劏房合法化，以保障住戶安全。身為租客，安全標準自然排在租住單位考慮的重要位置，故發牌一事理應獲得社會大眾的贊同。可是，在缺乏安置政策及配套設施下，發牌制度隨時弄巧成拙，將不適切居所居民放在危險懸崖上，正是居民擔心發牌的因由。

有建議發牌制度可參照《床位寓所條例》，但要留意是《床位寓所條例》雖然有規管伙數數目，但對象截然不同。《床位寓所條例》當時規管的規模有限，但現在居住分間樓宇的人數卻隨時超過十萬人，故處理手法及規模難以一概而論。此外，《床位寓所條例》以伙數為依歸，但現在劏房存在最嚴重的問題，並非每一單位共有多少間劏房、也不是單位大小的問題，而是劏房本身的安全問題，包括工程改動對樓宇結構的影響。當中涉及樓宇結構性、樓宇負荷程度、單位內的鋼筋混凝土情況、單位衛生問題、單位物料設計、走廊走火通道、甚至樓宇後樓梯有沒有被阻隔或封鎖等，問題已經由室內安全、延伸至整幢樓宇。如果參考《建築物條例》，根據本會觀察，其實不少分間樓宇已經違反條例，即使居民自身亦充分體驗到有關情況。可是，安全性即使為居民關注的問題，但礙於收入所得，面對市面高昂租金，方會漠視自身安全，選擇住進劏房環境之中。

如果政府全面發牌規管劏房，符合資格的劏房單位居民故然有機會繼續居住，但違法單位居民最擔心是隨時被政府或業主、包租勒令搬遷，而面對無家可歸。住戶在搬遷過程中，會面對不同的搬遷困難，當中故然包括來自經濟上的困難，除租住單位需要的高昂租金外、尚需要如按金、水電按、及搬遷費用等額外支出，對劏房戶而言已是一吃力支出。另外，外界亦預期發牌規管後，不少涉及安全問題的單位會被有關部門勒令重新改裝或重建，而部份不符合資格的單位租客亦會不獲續租。所以預期單位供應將會減少，結果租金有機會進一步上升。最後，在租金升幅帶動下，不難想像居民會出現一個搬遷潮，單位愈租愈貴，但單位愈搬愈小，居住質素隨時更差，使不適切居所租客成為新政策下最大犧牲品，居民自然對發牌制度成效起疑。

現行安置政策下，如果居民在清拆過程中無家可歸，只會被轉送到臨時收容中心居住。但臨時收容中心位置偏遠，分別位於大澳及屯門，且收容中心僅提供床位，故對於本來居住劏房的居民而言，搬遷後不但對就學及就業帶來嚴重障礙，且環境隨時更惡劣於一般分間樓宇單位，尤其不利 2 人或以上家庭。所以，現行安置政策，未能針對劏房居民的需要，自然導致居民對發牌制度更沒信心，認為所謂安置無助市民改善環境。

本來，政府亦有共 3 所中轉屋提供予有需要居民，但房委會剛通過清拆朗邊中轉屋，預料屆時供應更加有限，所以整個安置政策將會面對更大困難。故政府除提供搬遷津貼外，應切法做好整個配套設施及完善安置政策。如果政府有決心處理劏房安全問題，除增建公屋外，政府亦應興建及提供位置處於市區或擴展市區的過渡性房屋，以讓有關租戶在搬遷過程中可供考慮，以便繼續輪候公屋及在市區就業。否則，一刀切去實行劏房規管，相信不但未能改善居民生活，更只會進一步激化低下階層的住屋困難。

(十一) 其他公營機構資源未被善用

除房委會外，房協及市建局本來亦擔當房屋發展的重要角色。可是，雖然房協轄下有 20 個公共屋邨，但超過 15 年已經未有再興建公屋，並只有近年方恢復興建資助出售房屋。雖然 2013 施政報告有提出房協未來會在沙田及沙頭角分別興建資助房屋及出租公屋，但合共只提供約 1,000 個單位，難以滿足市民龐大的房屋需要。而房協雖然近年有集中長者房屋項目，但對象明顯集中於中高收入組群。故回顧房協在近十年的角色，明顯針對基層市民的房屋政策完全停頓，未能發揮房協作為提供可負擔房屋的公營機構之角色。

另一方面，市建局本來角色應為進行舊區重建，促進市區更新，以改善舊區居民的生活環境。可是，隨舊區樓齡不斷增加，市建局的重建工作亦愈趨頻繁，再配合強拍條例，使市建局在舊區的角色舉足輕重。不過，舊區分間樓宇單位情況嚴重，故為數不少的租客會受到重建所影響，結果與市建局的磨擦日增。絕大部份居住在分間樓宇的租客均為低收入人士，在搬遷上既面對各種壓力及困難，在重建過後往往因租金大幅增加而被逼離開原有社區。所以，市建局的發展模式只會進一步收窄租客的生存空間，未有顧及基層人士所需，只注重發展，違背公營機構應該背起的社會責任，未有平衡各方利益。

鑑於以上各種情況，本會對諮詢文件有以下建議：

(一) 參考 1987 年及 1998 年 2 份長遠房屋策略，今次長遠房屋策略應將可負擔租金及樓價同樣歸納在今次文件目標之一，讓居民除公營房屋外，亦可以根據負擔能力選擇私人市場單位，釋放住屋供應。此外，今次文件只有訂下未來 10 年 47 萬單位之供應目標，而文件亦承認短期未必能滿足 3 年上樓承諾，再加上房屋署統計亦反映有 16% 住戶輪候公屋超過 3 年，數字尚未計算一眾非長者單身人士及凍結戶數目，故本會認為政府應該增建公屋至每年 35,000 個單位，切實實行 3

年上樓承諾的指標。

(二) 文件雖建議未來 10 年興建超過 28 萬個公營房屋單位，但公屋輪候冊已有達 23 萬申請戶，變相數字難以抵銷未來升幅。從近一年市民對資助房屋的超額認購現象，亦反映居屋興建量同樣難以滿足住屋需求。所以本會認為政府應該在推算中加入尚未滿足的公屋需求、以及尚未滿足的居屋需求的現況作考慮，否則是一次推算根本未能長遠解決房屋問題。

(三) 雖然諮詢文件有考慮到未來 10 年人口淨增長數字，以作未來房屋供應推算，但本會認為因過去公屋供應量不穩定、以及配額及計分制實施後導致淨增長需求被嚴重壓抑。由於統計處的家庭住戶推算是建基於過往趨勢的延續情況，所以更能反映在今次推算之中有機會出現低估情況。故本會建議政府可考慮在推算以外，增加一個容差量，以反映該群被壓抑的需求。

(四) 一人住戶佔全港比率愈來愈多，無論公屋或如置安心的資助房屋項目，其申請情況亦不斷提高，反映房屋政策有理由需要針對單身人士需求。可是，政府的房屋政策一向未有重視單身人士需要，故住屋需求已被長期壓抑，所以政府應考慮有關因素，評估單身人士的住屋需求所新增的住屋需求。

(五) 有見於 50 年或以上樓齡樓宇不斷增加，各類型重建項目預期將會不斷展開，所以居住在劏房的居民將會大受重建影響。可是，市建局多年來的重建項目經翻新後，樓價之高，根本未惠及基層市民。所以，政府應重新檢討市建局在重建項目的角色，尤其在舊區上如何配合居民需要，而不是將基層市民趕離原區。另外，文件中雖有推算因重建而引致的房屋需求，但基數只用 2010 至 2012 期間的數字，即平均 2.2 個住戶去推算、而不是透過政策二十一之前推算分間樓宇單位數目。故本會要求政府，應考慮以《香港分間樓宇單位的調查》樓齡達五十年或以上的平均分間樓宇單位數目去推算，以更準確反映現實情況。

(六) 比較之前兩份長遠房屋策略，今次諮詢文件未有著墨於市民的住屋需求而訂下了六四公私營比例。相反，以前有分別參考政府以及私人發展商的資源情況、置業意願、甚至對公私營房屋需求的飽和程度等。故本會要求長策會應公開其六四比之理據，並考慮以上因素，檢視六四比例能否滿足不同的住屋需求。此外，對於將居屋及公屋兩種針對不同對象的房屋類型捆綁在一起，本會認為有機會形成一對立情況，即公屋及居屋互相搶地。故要求長策會應按市民需求，按比例興建公屋、居屋以及私人樓宇單位，以穩定居屋及公屋的供應量。

(七) 輪候公屋遠超三年，但私人市場租金升幅遠超通脹以及收入，故政府實有需要考慮引入租務管制及租金津貼，改善基層市民生活。租務方面，不少租約欠缺釐印、甚至連租單亦欠奉或拒絕發出，租客毫無保障，出現大量租務糾紛。故政府應考慮設立部門(或由差餉物業估價署負責)，處理及監管全港所有租務活動，並可掌握全港不同類型市場的租金水平，為未來其他政策提供支援。另外，鑑於不適切居所租金加幅驚人，嚴重影響基層生活，故建議可先行在分間樓宇單位進行租務管制，減少對整個社會的影響。政府應重新修訂《業主與租客(綜合)條例》，恢復租金被限制於市值租金的九成、並每年租金加幅不可超過消費物價指

數私人住宅租金支出部份。此外，租住權保障方面，一年死約一年生約未能有效保障市民面對逼遷，故建議應將勒令搬遷期由一個月前通知改為至少三個月前通知，讓租客有合理時間租住其他地方。如在租約前屆滿時租客被勒令搬遷，出租人需要提供免租期作為補償。租金津貼方面，政府應為輪候公屋 3 年以上的市民，提供某一程度的租金津貼，直至有關市民上樓為止，配合租務管制，減輕經濟負擔。

(八) 文件雖然表示會優化配額及計分制，但最終只會進一步將 35 歲以下的非長者單身人士排拒門外。而由於配額制未有大幅增加，優化後最終亦不會對 45 歲或以上人士上樓情況有太大改善。故本會認為，政府應考慮短期內進一步調高非長者單身人士配額比例，並長遠而言正式取消配額及計分制，實現真正 3 年上樓承諾。另外，針對長策會建議興建插針式公屋，本會認為香港並非沒有土地，再發展現有屋邨並非一理想方案。可是，對輪候冊申請人而言，可以加快輪候時間的任何方案確實需要考慮接受。但本會認為，整幢樓宇只用作編配予非長者單身方案並不理想，與社區共融概念相違背。另外，本會認為透過現有屋邨之插針式公屋計劃應與政府通過在未來發展用地撥地興建公屋不同，不應因而減少原先其他公屋發展計劃所提供的公屋供應量。

(九) 長策文件雖針對未來 10 年的遠景，但卻未有交代任何中短期措施，包括任何其他臨時住屋安排。要知道，現時香港住屋問題嚴重，所謂遠水不能救近火，如何通過中短期過渡措施配合長遠房屋規劃，方可解決現時房屋上的困局。故本會認為，有關當局除發展局外，亦應與民政局等其他部門商討，討論在不同用地上興建或發展不同類型的住屋單位，尤其宿舍及工廈改建等安排，以連貫整個房屋政策。否則，單以公營房屋作主導，而無視其他一切可行性，難以通過各方資源解決房屋問題。

(十) 長策會有建議發牌規管劏房，但任何過渡措施欠奉，只會觸動居民的神經，擔心有一輪加租潮及搬遷潮，結果反而適得其反。故本會建議，不應一刀切規管劏房；應設立一段寬免期，容許未符合發牌規定的劏房有過渡時間可以用作改裝、或讓居民有足夠時間搬遷。政府宜先優先取締危險的單位，並按危險程度分批處理，減低引發搬遷潮的機會。政府亦要制訂一系列安置措施，包括提供租金津貼予居於不符合發牌條件的劏房戶、並尤其需要在市區及擴展市區興建如中轉房屋的單位，讓被勒令搬遷的住戶可以暫時居住在安全的居所，以輪候公屋或有足夠時間租住其他市面單位。

(十一) 政府理應重新檢視房協及市建局的角色。為善用房協資源，政府應儘快增撥土地予房協，去興建更多各類型的資助房屋，包括出租房屋以及出售房屋，幫助不同需要的市民儘快上樓。另外，香港有為數不少的市民，入息雖然超出公屋入息限制，但其經濟能力又不足以置業。故政府亦應重新恢復興建房協乙類出租單位，讓有需要市民可以增添選擇，減輕租金壓力。

另外，不少住客在重建後往往負擔不起同區的租金以及樓價，而被逼遷到其他較遠的區域，破壞社區發展。長策會也不過表示考慮未來重建項目會

增加中小型單位比例，但此舉並不等於樓價可為中低收入人士所負擔。故市建局應考慮，切實降低樓價，作為公營機構，應提供中層市民可負擔的樓價水平，甚至興建資助房屋；以及考慮在重建項目上興建出租單位，讓住客可根據其經濟考慮，繼續在原區生活。

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香港社區組織協會
二零一三年十二月二日