



香港地產建設商會  
THE REAL ESTATE DEVELOPERS ASSOCIATION OF HONG KONG

香港中環德輔道中19號環球大廈1403室  
1403 World-Wide House, 19 Des Voeux Road Central, Hong Kong  
Tel 2826 0111 Fax 2845 2521 www.reda.hk

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2 December 2013

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

Dear Sirs

**Consultation on Long Term Housing Strategy**

We are pleased to enclose our submission on the subject for the consideration of the Steering Committee.

Yours sincerely

**(Signed)**

Louis Loong  
Secretary General



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### Introduction

REDA is fully supportive of the Government's goal to tackle the current housing problem, in particular for those members of the community with low income. Hong Kong is a wealthy city and should be a showcase for the region with housing policies that will justify our claim to be Asia's World City.

The Chief Executive in his last Policy Address has identified serious problems that require a solution through fair-minded policies implemented in an open and transparent manner. Clarity in policy making and fairness in implementation is vital as no policy initiative will satisfy all sectors of the community and the Government must be able to justify its actions.

REDA represents the majority of Hong Kong's developers and as such effectively represents the private sector component of the development process. Whilst we do not pretend that we can solve the housing problem alone, we do believe the private sector can and should play a significant role in the provision of new quality housing.

### Some Preliminary Comments

- The Long Term Housing Strategy raises a fundamental question about the type of society the Government wishes for Hong Kong. Should Hong Kong aim for a market-driven economy with a safety net of subsidized housing to ensure a decent home for every Hong Kong family, or move to a more "social" society where an increasing percentage of Hong Kong families benefit from subsidized housing as in the case of Singapore? This is not a matter for REDA only but one for the Hong Kong community at large. However, we question whether the accepted need to increase the total supply of housing units leads to a conclusion that the ratio between public and private housing (currently 50/50) has to change to 60/40 in favour of subsidized housing.
- REDA is supportive of the need to provide an adequate supply of housing units to overcome the current housing problem but we caution that if supply is



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excessive, the middle class will suffer as values drop significantly. We do not support the destruction of value for hardworking middle class families in Hong Kong.

- The assumption that there is an acute shortage of housing land also needs to be examined with care. Our members could deliver a substantial increase in the number of housing units if current development applications of the private sector were not stuck in the land exchange or lease modification process. Housing units are available if current planning applications were approved.
- The assumption that increased plot ratios will require a trade off as they will result in negative impacts on traffic, population density and the environment also needs further examination. Development densities up to the maximum permitted under the Buildings Ordinance, provided the permitted building heights are not unduly constrained, may bring transport benefits (through less commuting) and environmental benefits through greater open space at street level and reduced “wall effect” buildings. A relaxation of certain planning restrictions, especially building heights to allow higher plot ratios as permitted under the Buildings Ordinance, is perhaps the quickest way to increase the supply of housing units and REDA believes this is possible without any significant trade off.
- The Long Term Housing Strategy should not just focus on creating a large number of housing units but on creating quality housing units for future generations – it is after all a *long term* housing strategy. As society has evolved, conservation has become increasingly important. REDA believes a strong and clear conservation policy is vital for Hong Kong to justify its claim to be Asia’s World City. We also believe that this can be achieved without constraining housing supply. It would be overly simplistic to argue to release existing country park land for housing. There are enclaves within country parks that should be conserved and areas that can be considered for development. A policy of no net loss in the area of Hong Kong’s country parks might be a reasonable starting point in that it would conserve the best of our countryside and allow development in peripheral areas.



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### The Housing Picture in a Snapshot

As of March 2013, there were 2,386,000 households in Hong Kong<sup>1</sup> and 2,616,000 units of permanent residential flats (including public and private housing)<sup>2</sup>. Approximately 53% of the above households resided in private permanent housing and 46% of them in public housing (rental or subsidized sale flats) (*Appendix 1*).

The number of applicants on the Waiting List for public rental housing increased from 108,300 in 2000 to 234,300 in 2013. However, if non-elderly, one-person households are excluded, the number of applicants is reduced to 118,700, a figure that is only marginally higher than that of 99,600 in 2000 (*Appendix 2*). Specifically, the number of non-elderly, one-person applicant “households” has increased from 8,700 in 2000 to 115,600 in 2013; such households now account for almost 50% of the total applicants on the Waiting List. The main reason this latter group gave for wishing to apply for public rental housing was that they “want to live alone”<sup>3</sup>.

It is clear that where the official estimate of the demand for affordable housing is concerned, Hong Kong is facing a totally different demographic landscape. Whether all current non-elderly, one-person applicants ultimately qualify for public subsidy of some kind or not, the perception of the purpose of “social” housing, and the definition of “families in genuine need” seems to have changed.

### Increasing Housing Supply

To quote from the Foreword of the Chairman of the Long Term Housing Strategy Steering Committee in the Consultation Document (September 2013), “*The housing problem goes beyond the mere assessment of supply and demand. It encompasses issues of land, planning, transport, environment and community facilities, which cut across the aspirations and interests of different stakeholders. All these require the*

<sup>1</sup> Source: Census and Statistics Department:  
<http://www.statistics.gov.hk/pub/B10500012013QQ02B0100.pdf>

<sup>2</sup> Source: Hong Kong Housing Authority:  
<http://www.housingauthority.gov.hk/en/common/pdf/about-us/publications-and-statistics/HIF.pdf>

<sup>3</sup> Source: Hong Kong Housing Authority  
[http://www.cityu.edu.hk/hkhousing/prm/Survey\\_Buyers\\_HOS\\_2nd/Survey\\_on\\_Buyers\\_of\\_2nd-hand\\_HOS\\_2011\\_SHC60-12\\_e.pdf](http://www.cityu.edu.hk/hkhousing/prm/Survey_Buyers_HOS_2nd/Survey_on_Buyers_of_2nd-hand_HOS_2011_SHC60-12_e.pdf)



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*Government and the community to change their mindset and to map out a new direction (Emphasis added)."*

Taking this statement at face value, and bearing in mind the demographic trend described above, REDA proposes that the following measures for increasing the housing supply be further explored.

### The Short and Medium Term

- (1) *Tap undeveloped potential*
- (a) Redevelopment of old urban areas has been ongoing for years, with opportunities being taken up by the private sector, the Urban Renewal Authority as well as the Housing Authority. Nevertheless, despite good intentions, redevelopment programmes are often mired in controversies. It is submitted that a less controversial, less invasive and less disruptive method to achieve the same gain in housing floor area can be obtained by a managed "Transfer of Development Right" process. Air space that is not fully utilized in a development could thus be bought and sold in the public interest. This practice is not new in Hong Kong, and the time is ripe to have it reinstitutionalized.
- (b) There are currently 50 parcels of land zoned CDA (Comprehensive Development Area) in Hong Kong that have not been developed<sup>4</sup>. Most of them are multiple lots aggregated into one CDA zone, but in multiple ownership (whether in terms of land parcels or units). The total residential GFA that could be generated is approximately 38,000,000 sf (*Appendix 3*). It is submitted that a substantial portion of these sites can be reactivated by rezoning the lots to R(A), R(B), R(C) or R(E) to release them from the multiple ownership bondage.

<sup>4</sup> The 50 parcels do not include those with land exchanges executed.



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### (2) *Harness private sector resources*

To quote another statement in the Chairman's Foreword to the Long Term Housing Strategy Consultation Document, "*we should also explore innovative means, leveraging on the private sector's capacity and promoting public-private partnership, to build more adequate and affordable housing for the public*".

The Administration should explore giving incentives to the private sector to include affordable units (as defined by the Government) in their developments, as is the practice in London. The Government has a proven and impressive track record in developing subsidized housing. In earlier years, the resultant estates, being located in urban areas allowed their inhabitants ready access to jobs and social services. However, as later developments have been obliged to push increasingly towards the fringes of the territory, issues of accessibility, social and economic integration have emerged, Tin Shui Wai being a case in point. Involvement of the private sector allows a diversity of location and the potential for far greater social and economic integration.

### (3) *Enhance the delivery system*

There are vast tracts of land in the New Territories and some in the urban areas that are amenable to land conversion (lease modification and land exchange). Historical data shows that this is a very important source of private housing supply (*Appendix 4*). The precipitous drop in recent years in the number of units from this source should be of concern. We do not wish to speculate on the causes of this drop but anecdotal evidence points to increasing difficulties encountered in the "procedural and approval requirements".

The Chairman's Foreword to the Long Term Housing Strategy Consultation Document states that "*The Steering Committee therefore urges the Government to continue the review of various procedures and approval requirements in relation to planning and land administration, with a view to releasing land and making the best use of land resources.*"



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Agreeing with the Steering Committee, REDA recommends:

- (a) Procedures should be streamlined and more resources should be deployed and allocated in the right direction with dedicated teams set up for trouble shooting.
- (b) Entrustment of infrastructural works to the private sector, a practice that was pivotal for speedy and coordinated deliveries of major residential developments, should be reintroduced.
- (c) An expert determination mechanism for stalemated premium negotiation should be studied.

### *The Longer Term – Thinking Out of the Box*

#### *(1) Rental voucher*

In the longer term, the administration of affordable housing via rental vouchers/subsidies is worthy of consideration. It will give the freedom of choice to the recipients: freedom of choice of units and of location. Requirements that apartments rented under any rental subsidy scheme must fulfill minimum standards (for example, of light, air and safety) would also serve to resolve many current concerns about substandard units. It will be a matter of choice for the landlords (who are mainly individual owners of existing units, maybe subdivided units as well) to decide whether to upgrade to meet the Government's requirements, and hence to participate in the scheme. There will be some who argue (as echoed in the Long Term Housing Strategy Consultation Document) that this will drive up rents, especially at times when the market is tight. Latest statistics however show that there are more units than households, and that the vacancy rate of around 4% is in line with the average historical figure. It is also clear that the very measures now being adopted by the Government will further ease the market in the near term. We have faith that the efficacy of the proposals in the Long Term Housing Strategy will ensure an equilibrium of supply and demand.



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### (2) *New product types – Live/Work unit*

With the Administration's policy objective to develop creative industries, "live/work units", as pioneered in New York, should be allowed and encouraged – and not only in designated geographical areas. As experience tells us, creativity does not happen by decree. Live/work units allow creative and efficient use of space, efficient use of time and zero transportation costs. They foster the cross-pollination of ideas between disciplines and the sharing of resources among startups. Important details, such as whether live/work units are to be allowed in both existing buildings and "new builds", and the type of licensing system required, should be explored in the Hong Kong social and planning context.

Hard decisions will have to be made in the long term. Hong Kong is unlikely to have the luxury to grow into a "Greater Hong Kong" on the model of London or New York. Aspirations for lower living densities will have to contend with the major disadvantages of more spread out developments – the environmental costs of more roads, drainage, sewerage, and other infrastructure being increasingly a matter of public concern. The widespread desire for a greener Hong Kong in fact implies smart developments in more concentrated forms than before.

REDA recognizes that there will be no easy solutions but feels that controversies can be reduced by observing a few principles:

#### (1) *Respecting private development rights*

This is especially crucial as the last chapter of the Long Term Housing Strategy Consultation Document states that "In order to fulfill our long term housing demand as projected in Chapter 4 and beyond, it is estimated that Hong Kong will need to build the equivalent of one new town per decade." The industry's private landholdings may form multiple nuclei of development and be an integral part of new town development.





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### (2) *Respecting livelihoods*

The concept of high rise farming (or vegetables factories) should be explored to look after the interest of the displaced farms and farmers. It is a concept already commercialized in Singapore. Government investment in this area will also be consistent with its aim to promote research and development in new technologies.

### (3) *Engaging the community*

Regarding land exchanges, REDA suggests that the Administration investigate apportioning a percentage of premium revenue to the particular district on which the development is sited for community improvement projects, facilities and services to engage the community and stakeholders further.

### Concluding Thoughts

A brick-and-mortar approach to subsidized housing has always been the norm in Hong Kong. The Steering Committee has rightly called for flexibility in the implementation of the Long Term Housing Strategy (supply-led, 60/40 public/private split), but as history has shown, whilst figures can be changed at will, these changes do not translate well in practice. A brick-and-mortar approach delivery mechanism requiring a long lead time does not easily accelerate or decelerate to accommodate change in circumstances, especially in an open economy like Hong Kong.

The Steering Committee states that *“the Government should instill in the younger generation confidence in the future by demonstrating its determination to gradually resolve the housing problem, and establish an effective housing ladder<sup>5</sup> which promotes upward mobility. Given their prime age and better potential for upward mobility (especially those who have completed their tertiary education), increasing the supply of HOS should be an effective way to address the aspiration of the*

<sup>5</sup> Taking the buyers of Secondary Market HOS flats as a sample, a survey conducted by the HA in 2009 and 2011 however showed that an overwhelming 90% (or more) of them do not have any desire to sell their units (HA Paper No. SHC 60/2012). This survey is conducted biannually and the results are consistently similar.



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*youngsters*”, and urges the Government “*to increase HOS supply considerably beyond what has already been pledged...*” Whilst the aim of the Steering Committee is to be applauded, REDA wishes to point out that subsidizing housing to address housing inadequacy and subsidizing home ownership to facilitate upward mobility are not necessarily overlapping policy areas.

REDA would remind the Administration that the private sector has always played an important, pioneering and (where land made available has permitted) efficient role in affordable housing production, be it in the urban or rural areas. The industry’s continued contribution to housing production will ensure that there will always be a diversity of choice for aspiring home owners. At the same time, REDA fully recognizes the Government’s excellent track record and continuing crucial role in providing “social housing” to those in genuine need.

In terms of private sector provision, clear guidelines, consistency of Government practice, a sufficiency of land supply and the willingness to make imaginative choices will allow for speed, variety, choice and urban integration. In terms of public sector provision, REDA is confident that the Government will judge wisely where to direct limited taxpayers’ resources, how to enhance the fairness of our social provision by focusing on those in greatest need, and how to use flexible means of delivering subsidy so as to avoid the mismatches with market cycles that have occurred in the past.

Given the role that housing plays in Hong Kong’s economy, any policy tools used to tackle housing sufficiency should be fine grained, targeted and nimble.

**The Real Estate Developers Association of Hong Kong**  
**November 2013**

**Distribution of Population & Households by Type of Housing in Hong Kong**  
**(As at December 2012)**

Type of Housing	Population		No. of Households <sup>#</sup>		Average Household Size*
<b>Public Permanent Housing</b>	3,337,724	46.5%	1,101,870	46.2%	2.9
- <i>Rental Flats</i>	2,124,658	29.6%	727,425	30.5%	2.8
- <i>Subsidized Sale Flats</i>	1,213,065	16.9%	374,445	15.7%	3.1
<b>Private Permanent Housing</b>	3,804,287	53.0%	1,268,820	53.2%	2.9
<b>Private Temporary Housing</b>	35,890	0.5%	14,310	0.6%	2.4
<b>Total:</b>	<b>7,177,900</b>	<b>100.0%</b>	<b>2,385,000</b>	<b>100.0%</b>	<b>2.9</b>

Remarks: The above figures of population and number of household for various type of housing are derived by multiplying the total population / number of household by the relevant distribution in percentage as set out in "Housing in Figures 2013" and website of the Census & Statistics Department.

<sup>#</sup> As set out in the "Quarterly Report on General Household Survey - April to June 2013" published by the Census and Statistics Department, the total number of households as at 1st Quarter 2013 is 2,386,200.

\*The figure of average household size is extracted directly from the "Housing in Figures 2013", which is different from that as derived by dividing the above population figure by the number of households.

Source:

"Housing in Figures 2013" by the Hong Kong Housing Authority

<http://www.housingauthority.gov.hk/en/common/pdf/about-us/publications-and-statistics/HIF.pdf>

Census & Statistics Department:

<http://www.censtatd.gov.hk>

**Stock of Permanent Residential Units in Hong Kong**  
**(As at March 2013)**

Type of Housing	No. of Units (Thousands)	
<b>PUBLIC HOUSING</b>	1,158	44.3%
- <i>HA Public Rental Housing Flats</i>	728	27.8%
- <i>HA Interim Housing Flats</i>	5	0.2%
- <i>HS Rental Flats</i>	34	1.3%
- <i>HA Subsidized Sale Flats</i>	375	14.3%
- <i>HS Subsidized Sale Flats</i>	16	0.6%
<b>PRIVATE HOUSING</b>	1,458	55.7%
<b>TOTAL:</b>	<b>2,616</b>	<b>100.0%</b>

Source: "Housing in Figures 2013" by the Hong Kong Housing Authority

**Summary of Total Number of Applicants on the Waiting List for Public Rental Housing in Hong Kong (2000 to 2013)**

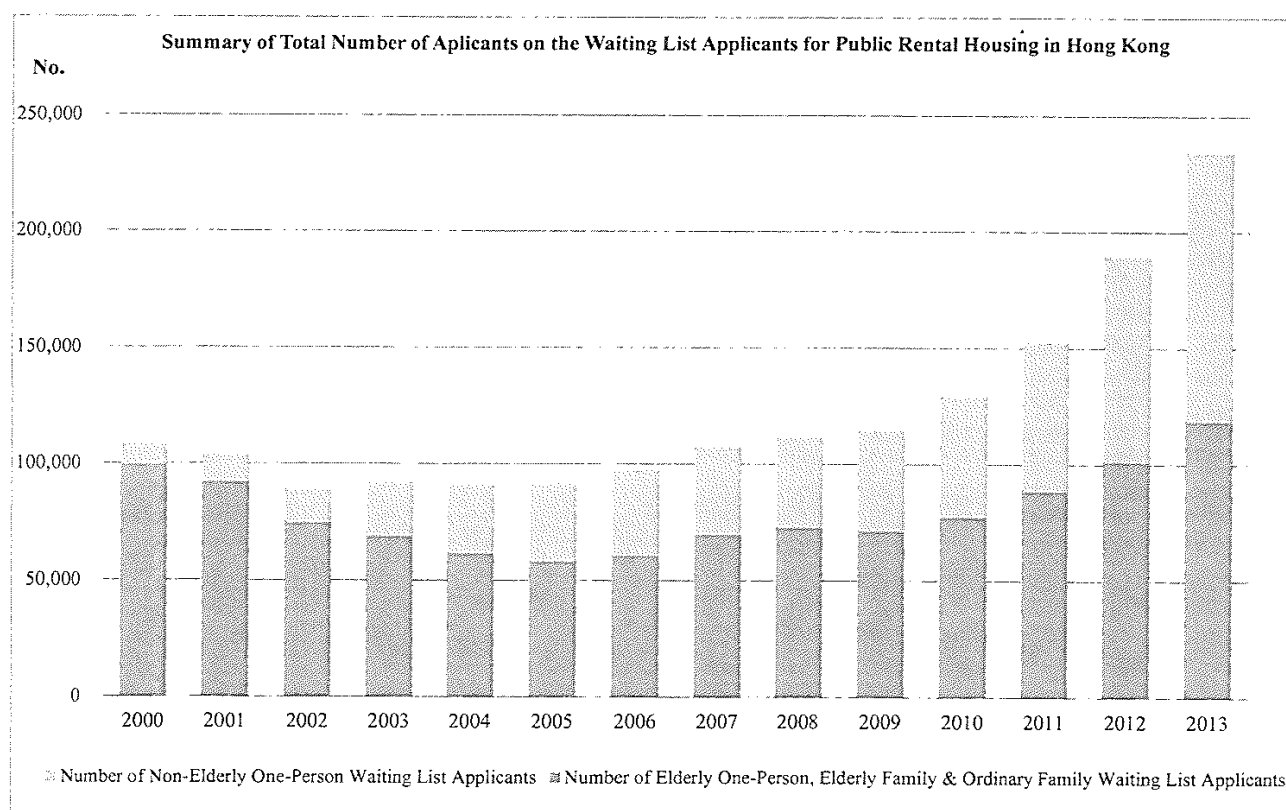
Year <sup>#</sup>	Total No. of Waiting List Applicants	Number of Elderly One-Person, Elderly Family & Ordinary Family Waiting List Applicants	Number of Non-Elderly One-Person Waiting List Applicants	Non-Elderly One-Person Applicants as a Proportion of Total Number of Waiting List Applicants
2000	108,300	99,600	8,700	8%
2001	103,600 *	92,200	11,400	11%
2002	88,800 *	74,600	14,200	16%
2003	91,900	68,900	23,000	25%
2004	91,000	61,600	29,400	32%
2005	91,400	58,100	33,300	36%
2006	97,400	60,500	36,900	38%
2007	107,300	69,800	37,500	35%
2008	111,600	72,900	38,700	35%
2009	114,400	71,300	43,100	38%
2010	129,100	77,400	51,700	40%
2011	152,400	88,600	63,800	42%
2012	189,500	101,200	88,300	47%
2013	234,300	118,700	115,600	49%

Remarks:

Source of information: Various papers from the Memorandum for the Subsidized Housing Committee, The Hong Kong Housing Authority & Analysis of Housing Situation of Waiting List Applicants as at end-June 2013, Legislative Council Panel on Housing.

# Figures as at the end of March for the period between 2000 and 2012 and as at the end of June for 2013.

\* These figures are derived from the number of non-elderly one-person waiting list applicants and the corresponding proportion of total number of waiting list applicants. They are therefore approximate only.



**Private Land Zoned "CDA" for More Than 3 years not Developed / Redeveloped in the Metro Area of Hong Kong**

Item No.	Address	Site Area (sf)(About)	Max. developable GFA (sf)		No. of Years Designated "CDA"
			Dom.	Non-Dom.*	
<b>A. "CDA" Sites with No Approved MLP and Proposed for Retention as "CDA" Sites by the Planning Department</b>					
1	Adjacent to Lai Hong Street (NKILs 6003RP, 6052 & Gov't Land) (To be known as NKIL 6357), South West Kowloon	253,662	1,648,803	380,493	14
2	Western portion of the area bounded by Sung Wong Toi Road, To Kwa Wan Road, Mok Cheong Street and Kowloon City Road, Ma Tau Kok, Kowloon (Freder Centre)	57,318	435,938	87,188	13
3	J/O Kowloon City Road and Ma Tau Kok Road, Ma Tau Kok, Kowloon	305,867	2,292,711	458,542	14
4	Middle part of the area bounded by Sung Wong Toi Road, To Kwa Wan Road, Mok Cheong Street and Kowloon City Road, Ma Tau Kok, Kowloon (KIL 7626, KIL 7628 & KIL 10578)	90,352	678,126	135,625	13
5	J/O Cheong Hang Road and Winslow Street, Hung Hom, Kowloon	50,515	0	613,542	13
6	56 Fuk Tsun Street & 1 Lime Street, Mong Kok, Kowloon (KIL 11170)	4,579	20,606	2,290	9
7	J/O Ma Tau Kok Road and To Kwa Wan Road (including Ming Lun Street), To Kwa Wan	200,725	903,263	100,363	6
8	North of Lai King Hill Road, Kau Wa Keng, Kwai Chung, New Territories	520,036	2,340,162	260,018	20
9	19-31 Ma Tau Pa Road, Tsuen Wan, New Territories	59,499	0	565,245	15
<b>Sub-total:</b>		<b>1,542,553</b>	<b>8,319,609</b>	<b>2,603,306</b>	
<b>B. "CDA" Sites with No Approved MLP and Agreed for Rezoning by the Planning Department</b>					
10	Yau Tong Industrial Area, Yau Tong	540,843	1,725,529	270,422	14
11	Eastern portion of the area bounded by Sung Wong Toi Road, To Kwa Wan Road, Mok Cheong Street and Kowloon City Road, Ma Tau Kok, Kowloon	156,410	1,170,574	234,115	13
<b>Sub-total:</b>		<b>697,253</b>	<b>2,896,103</b>	<b>504,537</b>	
<b>C. "CDA" Sites with Approved MLP and Proposed for Retention as "CDA" Sites by the Planning Department</b>					
12	Site at Chai Wan Road, Chai Wan, Hong Kong (No. 391 Chai Wan Road & adjoining Government Land)	115,712	692,269	2,002	11
13	Area bounded by Cha Kwo Ling Road, Ko Fai Road and Victoria Harbour, Yau Tong Bay, Kowloon	1,065,139	4,291,190	1,034,505	20
14	J/O Fook Yum Road and King Wah Road, North Point, Hong Kong	37,566	0	329,752	29
15	35 Clear Water Bay Road, Ngau Chi Wan, Kowloon	240,821	1,476,807	686,425	13
16	J/O Kwok Shui Road and Cheung Wing Road, Kwai Chung, New Territories	132,827	463,450	381,688	20
<b>Sub-total:</b>		<b>1,592,065</b>	<b>6,923,716</b>	<b>2,434,372</b>	
<b>TOTAL:</b>		<b>3,831,871</b>	<b>18,139,428</b>	<b>5,542,215</b>	

Remarks: Information based on MPC Paper No. 6/13 entitled "Review of Sites Designated "Comprehensive Development Area" on Statutory Plans in the Metro Area for the Year 2012/2013" for consideration by the Metro Planning Committee at their meeting on 15.3.2013 and relevant information from the TPB's website. Only those sites with land grant / land exchange / lease modification not executed have been included in the above table. \*Non-Dom. PR of 0.5 assumed for Item Nos. 6, 7, 8 & 10.

**Private Land Zoned "CDA" for More Than 3 years not Developed / Redeveloped in the New Territories**

Item No.	Address	Site Area (sf)(About)	Max. developable GFA (sf)		No. of Years Designated "CDA"
			Dom.	Non-Dom.	
<b>A. "CDA" Sites with No Approved MLP and Proposed for Retention as "CDA" Sites by the Planning Department</b>					
1	South of Tin Wah Road, Ha Tsuen, Yuen Long, New Territories	1,664,303	226,042	0	18
2	East of Tung Tau Tsuen, Ha Tsuen, Yuen Long, New Territories	709,685	279,861	0	18
3	South of Tam Mei Barracks, Ngau Tam Mei, Yuen Long, New Territories	2,118,153	850,348	0	18
4	East of Sheung Chuk Yuen, Ngau Tam Mei, Yuen Long, New Territories	1,035,885	419,792	0	18
5	Lots 2744ARP, 2744BRP and adjoining Government land in DD 124, Tan Kwai Tsuen Road, Yuen Long, New Territories	106,337	106,832	0	16
6	Long Ha, Kam Tin, Yuen Long, New Territories	1,214,017	485,607	0	13
7	South-east of Tong Fong Tsuen and west of Ping Ha Road, Ping Shan, Yuen Long, New Territories	177,023	177,023	0	11
8	Site abutting Tung Wui Road and Kam Po Road, Kam Tin	270,271	108,108	0	6
9	West of Ex-Dills Corner Camp and North of Fanling Highway, Kwu Tung, New Territories	1,135,215	454,086	0	17
10	North-east of Ex-Dills Corner Camp - Kwu Tung near Tong Kok, New Territories	595,244	377,921	0	13
11	Nam Pin Wai Road, Sai Kung, New Territories	141,448	106,086	0	18
12	Sai Kung Town North ("CDA(1)")	637,890	956,835	0	8
13	Ying Yip Road, Tseung Kwan O Area 92, New Territories	459,500	168,993	0	17
14	Sok Kwu Wan, Lamma Island, New Territories	214,514	129,167	0	12
15	Kap Pin Long, Sai Kung, New Territories	138,994	27,799	0	14
<b>SUB-TOTAL:</b>		<b>10,618,479</b>	<b>4,874,500</b>	<b>0</b>	
<b>B. "CDA" Sites with No Approved MLP and Already Agreed for Rezoning by the Planning Department</b>					
16	West of San Hing Tsuen, Lau Fau Shan Road, Ha Tsuen, Yuen Long, New Territories	1,184,320	462,848	0	18
17	North of Fung Kong Tsuen, Lau Fau Shan Road, Ha Tsuen, Yuen Long, New Territories	1,923,304	775,001	0	18
18	East of Fung Kong Tsuen, Ping Ha Road, Ha Tsuen, Yuen Long, New Territories	1,290,193	516,667	0	18
19	North of Hong Mei Tsuen, Ping Ha Road, Ha Tsuen, Yuen Long, New Territories	1,520,745	602,778	0	18
<b>SUB-TOTAL:</b>		<b>5,918,562</b>	<b>2,357,294</b>	<b>0</b>	

**Private Land Zoned "CDA" for More Than 3 years not Developed / Redeveloped in the New Territories**

Item No.	Address	Site Area (sf)(About)	Max. developable GFA (sf)		No. of Years Designated "CDA"
			Dom.	Non-Dom.	
<b>C. "CDA" Sites with Approved MLP and Proposed for Retention as "CDA" Sites by the Planning Department</b>					
20	Tai Kiu Village, Yuen Long, New Territories	209,487	827,474	417,927	10
21	Lots 311, 315RP, 316-318, 321, 323, 330-333, 335-341, 351-362 & Government Land in DD379, Tuen Mun Area 55, New Territories	275,051	357,567	0	18
22	TMTL 417, East of Tai Lam Chung Nullah and Customs and Excise Training School, Tai Lam Chung, Tuen Mun, New Territories	665,037	1,140,683	0	16
23	Tuen Mun Area 56, Tuen Mun, New Territories (Phase II of Avignon)	238,582	310,162	0	15
24	Various lots and adjoining Government land in DD107, Sha Po, Kam Tin, Yuen Long, New Territories (Phase II)	827,647	373,238	0	13
25	Various lots in DD130 to the north of Yuen Long Highway near Fuk Hang Tsuen, Yuen Long, New Territories	164,688	87,188	0	13
26	South of the former Military site at Shek Wu Wai, Yuen Long, New Territories	2,581,140	1,032,456	0	13
27	Sheung Shui Area 35 (SSIL 2RP and Government Land), New Territories	315,447	278,785	0	18
28	Sai Sha Road, Shap Sz Heung, New Territories	6,940,164	4,828,427	481,652	18
29	North of Fanling Highway near Yin Kong, Kwu Tung, New Territories	172,595	78,544	0	15
30	South of Castle Peak Road near Kam Tsin, Sheung Shui, New Territories	404,292	161,717	0	15
31	Lot 698 R.P.(part) and adjoining Government land in DD181, Heung Fan Liu, Sha Tin, New Territories	475,764	586,665	0	13
32	Fo Tan Station and Freight-yard, STTL 75, Lot 744 R.P. in DD176 and adjoining Government Land, Fo Tan, Sha Tin, New Territories	534,481	2,056,981	188,088	13
33	The Ex-Shaw Brothers' Studio site at Lots 214RP, 219, 220sA, 220sB, 220RP, 224 and 226 in DD229, and adjoining Government Land in Clear Water Bay, Sai Kung, New Territories	845,300	1,111,071	255,320	11
34	East of Ping Ha Road and north of Castle Peak Road, Ping Shan, Yuen Long, New Territories (Northern Part only)	128,316	128,316	0	11
<b>SUB-TOTAL:</b>		<b>14,777,991</b>	<b>13,359,273</b>	<b>1,342,987</b>	
<b>TOTAL:</b>		<b>31,315,032</b>	<b>20,591,067</b>	<b>1,342,987</b>	

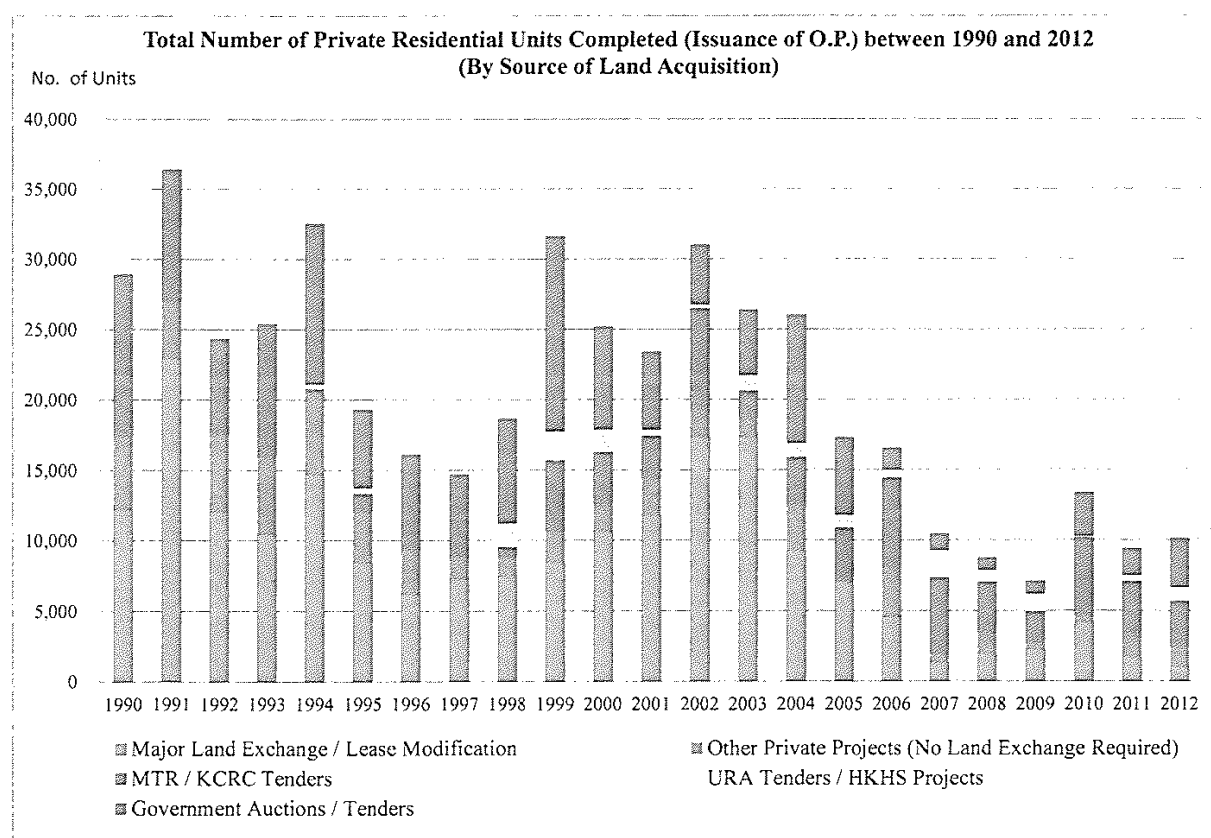
Remarks: Information based on the RNTPC Paper No. 4/13 entitled "Review of Sites Designated "Comprehensive Development Area" on Statutory Plans in the New Territories for the Year 2012/2013" for consideration by the Rural and New Town Planning Committee at their meeting on 15.3.2013 and relevant information from the TPB's website. Only those sites with land grant / land exchange / lease modification not executed have been included in the above table.

**Total Number of Private Residential Units Completed (Issuance of O.P.) between 1990 and 2012  
(By Source of Land Acquisition)**

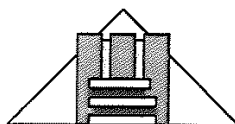
Year	Total No. of Units	Government Auctions / Tenders	Major Land Exchange / Lease Modification	MTR / KCRC Tenders	URA Tenders / HKHS Projects	Other Private Projects (No Land Exchange Required)
1990	28,937	7,174	12,201	4,224	48	5,290
1991	36,434	9,452	22,949	0	0	4,033
1992	24,385	6,817	12,072	0	0	5,496
1993	25,440	6,777	10,469	2,576	0	5,618
1994	32,578	11,425	14,718	0	344	6,091
1995	19,327	5,555	8,446	1,224	448	3,654
1996	16,139	5,756	6,225	960	0	3,198
1997	14,728	6,002	7,325	0	26	1,375
1998	18,683	7,441	7,479	680	1,684	1,399
1999	31,663	13,893	8,446	4,978	2,076	2,270
2000	25,212	7,326	10,645	3,602	1,620	2,019
2001	23,428	5,529	11,726	2,936	472	2,765
2002	31,039	4,267	17,311	7,044	298	2,119
2003	26,397	4,651	17,327	1,976	1,122	1,321
2004	26,036	9,137	9,227	3,370	1,006	3,296
2005	17,321	5,526	7,057	3,465	924	349
2006	16,579	1,568	4,558	6,269	569	3,615
2007	10,471	1,181	1,307	5,337	1,932	714
2008	8,776	872	1,957	3,527	861	1,559
2009	7,157	942	2,275	2,169	1,271	500
2010	13,405	3,116	4,194	5,484	96	515
2011	9,460	1,918	1,711	3,980	445	1,406
2012	10,144	3,464	1,016	3,229	992	1,443

Remarks:

(1) Source of Information: Monthly Digest of Buildings Department.







THE HONG KONG HOUSING DEPARTMENT MAINTENANCE SURVEYORS ASSOCIATION

香港房屋署保養測量師協會

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

Date: 2 December 2013

Dear Sir/Madam,

**Views on the Consultation Document of the  
Long Term Housing Strategy (LTHS)**

I refer to the consultation document of the LTHS and wish to express the views of the Housing Department Maintenance Surveyors Association as follows.

As a crucial part of the LTHS, we advocate that the government should pay greater attention to improve the quality and social, environmental and economic sustainability of existing housing.

To this end, it is of paramount importance for the LTHS to set out directions for the government to enhance health and safety standards, improve energy performance, achieve greener environment, promote building maintenance and improvement and build stronger community, both for existing private and public housing.

A number of comments received from our members are also attached in the annex for your consideration.

Yours Sincerely,

**(Signed)**

CHENG Po-ming, Danny

Chairman of HDMISA, 2013-2014

## Annex

1. 在長遠房屋策略諮詢文件的內容中，沒有觸及現有房屋的實際狀況，例如：樓宇安全、老化、失修、維修與保養的問題。由於舊樓老化及失修的問題日趨嚴重，有需要全面檢討現時房屋的整體狀況以及維修與保養的工作，延長樓宇的壽命，藉以減少未來房屋供應量的需求。
2. 在制訂長遠房屋策略中，應考慮為房屋的適切性訂出一個目標作為房屋健康及安全的標準，以衡量房屋的狀況是否適合居住。
3. 重建舊公共屋邨並不符合經濟效益，在重建過程中需要投入大量房屋資源安置現有的居民。適切的維修保養和改善工程會更有經濟效益以及有利於保護環境。

By post and by fax at 2761 5160

29 November 2013

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

Dear Sir/Madam

**Long Term Housing Strategy Consultation Document –  
“Building Consensus, Building Homes”**

In response to the consultation document on Long Term Housing Strategy, we are pleased to provide herewith our views and suggestions on the subject for the consideration of the Long Term Housing Strategy Steering Committee.

Thank you.

Yours faithfully

**(Signed)**

Ir Raymond CHAN Kin Sek  
President  
The Hong Kong Institution of Engineers

Enc

RC/WC

**Enclosure****Views from the Hong Kong Institution of Engineers on  
Long Term Housing Strategy****Introduction**

The Hong Kong Institution of Engineers (HKIE) shares with the Long Term Housing Strategy Steering Committee that housing is an essential public issue that concerns the livelihood of all people. We agree that the Long Term Housing Strategy should be built upon the vision of providing adequate and affordable housing to the people of Hong Kong through re-establishing an appropriate housing ladder that facilitates upward mobility and this vision should be holistic and sustainable. We urge that the Administration should strive for public consensus in formulating long term housing strategy for Hong Kong.

2. Focusing on the overall benefits of Hong Kong society, the HKIE supports that the long term housing strategy should address the needs of all citizens. In particular, we believe that the Administration should adhere to the principle of fair allocation of public housing resources, and tighten the measures to guard against the abuse of public rental housing. We also urge the Government not to overlook the housing need of the middle class and should assist in lessening their burden when forming any related public policies.

3. Housing is a multi-faceted problem, solution of which would hinge on effective balancing of all contributing factors that affect the long-term development of Hong Kong. While we have no strong opinion on the proposal of pursuing a supply-led strategy, we recognise that the adoption of such a strategy would enable the Government to be more proactive in dealing with the housing problem. In order to meet the target as pledged, all essential elements that facilitate housing construction should be well addressed. With our expertise in engineering, the HKIE would like to submit the following opinions on these elements for consideration.

**Land Supply**

4. Having established the housing needs and the adoption of a supply-led strategy, Hong Kong should duly address the issue on the adequacy of land supply which should be our prime concern. While it is noted that the Administration has been holding consultations on the land supply strategy with particular emphasis on the new development areas in New Territories, the HKIE urges the Administration to enhance the engagement exercises with the stakeholders and devote more efforts on securing community consensus. In this way, it is hoped that sufficient usable land could be progressively made available on time. This can also facilitate the Administration to have better grasp of the available residential sites to meet the housing supply target. We further urge the Administration to accelerate exploring ways to convert the unused land or relocate non-essential facilities to other fringe areas or caverns so as to release more urban land for residential use. The Administration should also take solid steps

to combat the general fear of lack of Land Bank for residential public and private housing developments by expediting the study and launching some of the least controversial parts in the “Enhancing Land Supply Strategy”, such as reclamations outside Victoria Harbour and artificial islands in Central Waters, that can provide large chunk of land for the years to come.

### **Town and Infrastructure Planning**

5. The HKIE is of the view that Hong Kong should review the urban/town development in a more holistic manner. To release more urban land for efficient use, we agree that urban renewal works should be expedited wherever possible. However, it is strongly suggested that the new housing units constructed on these sites should take into consideration of the affordability of less wealthy classes. Where further potential housing construction sites can be identified among the existing residential areas or if the plot ratio of a certain area is to be increased, the HKIE suggests that the Administration should sweeten up the deal by enhancing the corresponding social and infrastructural facilities so as to soften up the resistance from the local residents. Opportunity should also be taken to improve the overall condition of the areas concerned. In order to encourage public participation and building consensus, it is suggested that some of the questions posed or issues discussed should best be illustrated with examples that can easily be related, so as to facilitate understanding through informed discussions and deliberations within the community.

6. In regard to the housing constructions over the remote and new development areas, the HKIE urges that the Administration should take into consideration the necessity of providing or supplementing the areas with affordable and efficient transportation facilities, so as to attract more inhabitants. Public spending on subsidising mass transportation construction and even initial operation, if conducive to meeting objectives of the long term public housing strategy with a lower total cost, should also be considered and included as a part of the overall strategy.

### **Manpower Issues**

7. The HKIE wishes to stress that the forthcoming housing construction and infrastructure projects will require input from professionals as well as a skilled construction workforce. Hence, we are of particular concern on the availability of sufficient and qualified manpower in carrying out the housing construction projects in meeting the supply target.

8. We stress that the Administration should prepare a long term manpower plan taking into serious consideration of manpower requirement for future housing and related infrastructural projects. As a professional organisation, the HKIE is especially concerned on the availability of well-qualified professional engineers and technologists in planning and implementing the construction projects with particular emphasis on maintaining quality and safety. The Administration should ensure that sufficient resources should be injected in facilitating the education and continuous development of engineers and technologists for the above purpose.

9. The HKIE is also concerned on retaining quality workforce and attracting new blood to the construction industry to carry out the upcoming housing construction projects. We suggest the Administration to take lead and to encourage the construction practitioners in improving the remunerations and employment terms as well as providing safe working environment for workforces in the construction and engineering industries.

#### **Efficiency Enhancement**

10. The HKIE observes that the lead time now required from designing to completing a housing construction project can consume considerable time and efforts in fulfilling the application, monitoring and approval procedures. This would in turn prolong the lead time in fulfilling the housing supply target. Doubtless to say, the HKIE fully appreciates the legal and administration mechanism now in place to ensure that all the housing projects can be carried out in the highest quality and the best of planning. However, for continuous improvement and efficiency enhancement, the HKIE suggests the Administration to review and streamline the mechanism and practices, on areas such as application and assessment process of land lease and land use modification, vetting and approval mechanism on new buildings development, and related works monitoring process, etc. It is expected that with an overriding objective of driving for higher efficiency with no compromise on safety and quality, efficiency enhancement measures on the current mechanism will rationalise time and resources spent on housing development, thus enabling more housing projects to be carried out within a shorter time frame.

#### **Sustainability of Strategy**

11. The HKIE understands that achieving the supply/demand equilibrium in the housing market is never an easy task. While our concerns as raised above illustrate that meeting the supply target requires the need to address some of the above highlighted issues, we also wish to point out that it is difficult to forecast the demand precisely. The situation will be very much affected by the financial and economic situation both in Hong Kong and overseas. Also, housing demand would be subject to the manpower policy changes such as the import of foreign professionals and labour to carry out the housing and infrastructure projects. Hence, the forecast provided on future housing supply and demand should also take into consideration of the aforementioned factors. We trust the Administration will remain focusing on the sustainability and adaptability of the long term housing strategy over time with the changes in supply and demand.

#### **Conclusion**

12. The HKIE well notes that formulating a housing strategy with a vision to provide adequate and affordable housing to the people of Hong Kong is a complicated and challenging task that requires consensus among various stakeholders. In coming up with the housing demand, the consultation document goes into some detail in showing how the estimates were derived. However, there is inadequate coverage on

the supply side regarding issues such as land supply, town and infrastructure planning, manpower, etc. Along this thought, the HKIE is of the opinion that the Administration should view the housing issue in a wider perspective by incorporating all the intertwining issues including those elaborated above, so that they can be comprehensively and adequately addressed. In this regard, we expect the Administration to devise clear roadmaps in areas such as manpower, land supply, environment and town planning.



# 香港中華總商會

The Chinese General Chamber of Commerce

於香港註冊成立的擔保有限公司

Incorporated in Hong Kong and limited by guarantee

香港干諾道中24-25號香港中華總商會大廈4字樓  
4/F, CGCC Building, 24-25 Connaught Road Central, Hong Kong  
Tel : 2525 6385 Fax : 2845 2610  
E-mail : cgcc@cgcc.org.hk Web Site : http://www.cgcc.org.hk  
編號 : RM(2013)12-19

郵寄及電郵 ([lths@thb.gov.hk](mailto:lths@thb.gov.hk))

香港九龍何文田佛光街33號  
房屋委員會總部第二座1樓  
長遠房屋策略督導委員會秘書處

敬啟者：

## 對“長遠房屋策略諮詢文件”的意見

長遠房屋策略督導委員會就本港未來十年的房屋政策提出一些發展大方向和解決方案，並諮詢公眾意見。鑒於住屋是本港社會的重要民生課題，對經濟及社會穩定發展有著關鍵影響，本會對此深表關注，並特別召開會議進行討論。

本會就諮詢文件提出的多項問題和建議進行分析，意見概述如下：

### 一、長遠房屋策略願景與需求推算

**問題 1** 你對長遠房屋策略應以供應主導，以及新落成公營房屋的建屋量佔較高比例的建議有何意見？

本會認為，房屋政策應以供求平衡作為大前提，因應經濟環境的轉變和市場需求變化，在供應方面作出靈活和適當調節，促進整體房地產市場健康平穩發展。

諮詢文件建議將未來十年新增的公私營房屋訂為 60:40 比例，本會認同在目前基層市民對住屋需求殷切的情況下，有關比例亦算恰當，惟當局必須因應市場供求變化作出適時檢討，以配合社會的實際需要。

本會關注新居屋的供應量，對私人市場的中小型單位，或會形成市場重疊，認為應按年調節居屋供應量，避免對私人市場造成過度衝擊。

**問題 2** 你對推算長遠房屋需求所採用的原則和方法有何意見？

根據諮詢文件的闡述，有關方面主要採用 2011 年人口普查結果作為對長遠房屋需求的估算。本港經濟、社會環境和房地產市場瞬息萬變，本會認為當局在採用人口普查資料作為推算需求的基礎上，應同時研究加入更多不同的市場因素(見以下兩段)，並盡量做到每年檢討和更新參考數據，讓房屋需求的估算更能貼近社會的真實情況。



- 問題 3** 你對諮詢文件界定“居住環境欠佳”的準則有何意見？
- 諮詢文件將臨時構築物、非住宅大廈、與其他住戶共用、以及分間樓宇單位等四大類情況定義為“居住環境欠佳”。本會認為，“居住環境欠佳”的情況應不止於此，例如現時不少樓齡甚高的樓宇，無論在樓宇結構、單位設施等都絕不理想，甚至涉及安全等問題，但這類樓宇不少因業權分散，甚難進行重建或改善，有關方面應正視有關情況。本會建議，當局應為“居住環境欠佳”制訂更清晰定義和客觀標準，例如單位是否擁有廚房和基本設施、居住面積達到一定水平、周遭環境符合一些基本條件等，從而為評估日後提供“適切居所”給予更有效的參考準則。
- 問題 4** 在推算房屋需求時，除諮詢文件提及的主要需求成份外，你認為是否還有其他因素需要考慮？
- 本會認為，現時社會上透過持有物業作為收租或長線投資的情況對本港房屋需求始終是一個不能忽視的部份。我們明白，諮詢文件雖指出在界定或準確量度市場對房屋投資的需求是非常困難，惟我們認為當局仍有必要將物業投資的因素考慮在內，並嘗試從市場上不同的訊息及資料數據作出合理的推算，避免低估本港整體房屋的真正需求。
- 問題 5** 你對於未來十年推算的總房屋供應目標和今後公私營房屋新供應的建議比例有何意見？
- 諮詢文件提出未來十年的新增房屋供應為470,000個單位，按建議的公私營房屋新供應比例計算，每年平均的公私營房屋新供應分別約為28,200個和18,800個。根據過去的經驗和目前社會對房屋的需求情況，相關的單位數目尤其公屋部份未必能滿足市場的需要。
- 本會期望，當本港的土地供應能逐步配合下，特區政府應積極探討增加整體房屋供應目標，並因應市場環境變化適時調整公私營房屋的供應比例。

## 二、 特定群組的住屋需要

- 問題 6** 就社會上建議撥地發展中高收入長者住屋計劃，你認為政府應否繼續支持？若然，應以何種形式支持？
- 本會認同，社會應照顧長者的居住問題，惟中高收入長者一般較有能力應付住屋需要，我們應優先照顧對住屋有更迫切需求的低收入長者，協助他們改善居住環境。

此外，供長者居住的單位在設計和周邊配套設施的要求跟一般住宅不同，私人發展商或會因商業考慮，不太願意推出在設計和配套設施均符合要求的長者屋；即使能夠推出，單位的定價亦必然很高。因此，本會認為長者的住屋計劃應由香港房屋協會等公營機構負責會較為合適。

**問題 7** 你對房委會增加配額及額外分數予非長者的一人申請者，以增加他們入住公屋機會的建議有何看法？

本會贊成房委會增加配額及額外分數予年逾 45 歲的非長者一人申請者，惟不同意擴及 40 歲甚至 35 歲以上的非長者一人申請者，避免鼓勵較年輕人士過早依賴公屋資源。

**問題 8** 你對長遠把公屋平均輪候時間為約三年的目標，循序漸進擴展至年逾 35 歲非長者的一人申請者的建議有何看法？

公營房屋資源應集中協助沒有置業能力、或能力較低的人士，而相對年輕的人士或應擁有較佳的工作能力。因此，我們並不贊同將公屋輪候的時間目標，擴展至年逾 35 歲的非長者一人申請者。

**問題 9** 有意見認為房委會在不影響已承諾供應的公屋單位數量之上，可在地積比率相對較低而有足夠基建設施的現有公共屋邨增建專為單身人士而設的公屋大廈，以加快對這類人士的公屋單位供應，你對這意見有何看法？

本會同意在地積比率相對較低而有足夠基建設施的現有公共屋邨增建公屋，但應開放予所有有需要人士申請，而非只給予單身人士，同時亦應以逾 45 歲單身人士作優先。

**問題 10** 若然市區有合適的臨時空置土地，你認為應否用來興建過渡性房屋予有需要人士？

本會支持在市區合適的臨時空置土地興建過渡性房屋予有需要人士，但必須考慮日後在搬遷及重新安置有關人士時在行政上和執行上可能遇到的困難。

**問題 11** 你對推行發牌或業主登記制度以規管住宅樓宇和綜合用途樓宇內的“分間樓宇單位”這意見有何看法？

在欠缺足夠公營房屋紓緩基層住屋需要前，本會支持透過發牌或業主登記制度以作為過渡性安排，惟當局必須高度關注和積極解決此類“分間樓宇單位”的消防安全、環境衛生等問題。

**問題 12** 你對在發售每期居屋時，預留某個比例的單位予單身人士這意見有何看法？

在善用資源的原則下，公營房屋應優先分配予最需要的人士；相對之下，單身人士對居屋的需求及迫切性應遠較家庭申請者為低。因此，本會認為沒有特別需要預留特定比例的居屋單位予單身人士。

**問題 13** 你對為日後發售居屋單位和其他資助自置居所計劃的“白表”申請者設立入息/資產下限，以增加有真正住屋需要而又合資格的首次置業者的機會這意見有何看法？

本會同意必須為“白表”申請者設立入息及資產下限，一方面防止超出負擔能力的申請者，同時亦可增加具備一定負擔能力的人士購置居屋單位的機會。

**問題 14** 對於重推以下各項計劃，包括**(a)**租置計劃；**(b)**為首次置業人士提供經濟資助；**(c)**提供租金援助和推出租務管制。你有甚麼看法？

本會並不贊成重推各項計劃，主要原因包括：

- (a) 租者置其屋計劃的租戶可選擇是否購回居住的單位，這將導致同一公共屋邨內出現部份購買、部份租住單位的情況，增加物業管理和規管的難度。
- (b) 首次置業貸款會刺激額外的住屋需求，增加對市場的壓力；政府應集中資源興建公屋和居屋。
- (c) 租金應與樓宇單位的市值掛鈎，租務管制影響業主投資樓宇的回報，亦窒礙本地甚至海外投資者意欲。

### 三、公共房屋資源運用與建屋機構角色

**問題 15** 你對訂定檢視配額及計分制下申請者入息和資產的機制及進行定期檢視，從而剔除輪候冊上不合資格的申請者這項建議有何意見？

本會支持定期檢視申請者的入息和資產機制，藉以剔除不合資格的申請者。

**問題 16** 你認為應否檢討和更新“富戶政策”？

本會認同應檢討和更新現行的“富戶政策”並嚴格執行，特別是入息超逾指定限額的住戶，必須繳交市值租金，甚至勒令其遷出公屋單位。

**問題 17** 你對房委會進一步改善寬敞戶政策，一方面提供誘因鼓勵寬敞戶遷往面積較小單位，另一方面加強行動處理寬敞戶個案這建議有何意見？

諮詢文件提出給予寬敞戶搬遷津貼和免租期等建議，本會贊同此舉有助釋出較大單位，加快公屋的流動性。

**問題 18** 你對於把公屋單位編配予輪候冊申請者，或進一步放寬目前的編配標準以改善現有公屋戶的居住環境兩者之間的優次有何意見？

本會認同諮詢文件所指，進一步放寬擠迫戶編配標準，難免耗用有限的公屋資源，影響輪候冊申請人的編配機會。因此，我們認為應優先把公屋單位編配予輪候冊申請者，以縮短輪候目標和紓緩輪候冊申請人不斷增加的壓力。

**問題 19** 你對政府邀請私營機構參與提供資助房屋單位有何意見？

本會贊成重新考慮增加私營機構的參與，透過私營機構的力量輔助政府加快房屋供應，惟必須對所有私人參與的計劃加強監管。

**問題 20** 為加快房屋供應，你認為政府可再進一步推行甚麼措施，以促進房屋發展及增加建造業人手供應？

目前，市區重建局擔當著推動市區重建的執行者和促進者角色，本會認為應可進一步強化市建局功能，加快推動各項重建計劃，以增加房屋供應。

此外，諮詢文件指出，現時建造業個別工種在短期內需要大量人手，透過聘請及培訓本地技術工人未能適時滿足需求。因此，我們認為當局應容許個別工種輸入外地勞工，以應對房屋興建量增加所帶來的額外人手需求。

#### 四、增加土地及房屋供應的措施

**問題 21** 在房屋土地供應緊絀的情況下，你是否願意為增加房屋供應，而相對對交通、人口密度和環境等方面可能出現的影響作出取捨，及接受適度提高地積比率，以增加房屋供應？

本會認為，面對房屋土地供應緊絀和短期內沒有更理想的選擇下，社會應作出適當妥協，為增加房屋供應接受提高地積比率、以及對周邊環境和生活配套可能帶來的影響。

問題 22 你認為應如何在發展和保育之間取得平衡？對增加房屋土地供應的不同方法有何意見？

目前，本港不少綠化地帶未被有效運用，當局應研究適度放寬郊野公園及綠化地帶作發展用途。一些位處市區邊緣或零星分佈於市區範圍的綠化地帶，不單具備優質發展潛質，亦應較容易獲城規會批准進行改變規劃用途，有關當局應探討就相關的綠化地帶進行重新規劃。

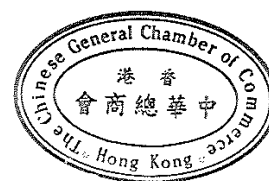
此外，本港北部地區的邊境和前禁區範圍仍有不少閒置用地，當局可考慮放寬有關土地的使用限制，同時亦可研究就區內一些私人土地進行收購的可行性，藉以釋放更多土地發展空間。

總括而言，本會認同特區政府應全面檢視土地供應和房屋發展規劃，多管齊下開發和善用土地資源，並因應經濟大環境變化，調整相關房屋政策和資助措施，促進本港長遠房屋供求平衡和社會持續穩定發展。

以上意見，請予參考。

此致

長遠房屋策略督導委員會



香港中華總商會  
2013年12月2日



香港建築師學會  
The Hong Kong Institute of Architects

Our Ref. : BLA/LTHSSC/RC/cw/1312

By Post

2 December 2013

Professor Anthony Cheung Bing-leung, *GBS, JP*  
Chairman  
Long Term Housing Strategy Steering Committee  
1/F, Block 2, Housing Authority Headquarters  
33 Fat Kwong Street  
Ho Man Tin  
Kowloon

Dear Prof Cheung

**Public Consultation on Long Term Housing Strategy**

Thank you for the letter dated 6 September 2013 from the Long Term Housing Strategy Steering Committee inviting the Institute's views on the issues and recommendations set out in the consultation document.

Subsequent to joint institute forum held on 31 October 2013, the Institute is pleased to deliver our views for the public consultation. Please find enclosed our written submission for your consideration.

Yours sincerely

... (Signed)

Rita Cheung (Mrs)  
Registrar

Encl



香港建築師學會

The Hong Kong Institute of Architects

## Gist on HKIA Position on Long Term Housing Strategy

HKIA welcomes the much needed Long Term Housing Strategy (LTHS) for Hong Kong, and considers that housing policies must be sustainable, has a long term vision not only in form but also in substance, having regard to the long term strategic positioning, planning and development of Hong Kong as a Special Administrative Region in the Pearl River Delta.

The LTHS consultation document focuses on the analysis of housing supply and demand, with thorough analyses of some essential aspects of the quantitative aspects of housing in Hong Kong. However, it does not address the sustainability issues such as strategic overview of population policy, economic thrust and scenarios for market fluctuations, not to mention the burning issues of land supply associated with the production quantum of 470,000 flats a year.

In more specific terms, the views of HKIA are summarized below : -

### 1) Lack of Vision for Quality Living

The LTHS consultation document focuses on the analysis of housing supply and demand, but there is no detailed discussion on any **long term vision for improving living quality**. It is obvious that resolving the current chronic shortage of housing supply in the territory has been taken as priority over other issues. But history always has its lessons for us: an urban planning mindset of **"quantity over quality"** always ends up with social consequences and a higher social cost to bear when the proposed developments become realized. Planning decisions for Tin Shui Wai, Tseung Kwan O and many other regretful rush-towns of the 90's are illustrious examples. As the Committee's very own title suggests, the "Long Term" housing strategy must give an indication on how they envisage the living standards in Hong Kong in the "Long Term". Such is not a priority issue it is an indispensable and integral part of the Study.

### 2) Lack of a Vision for our Social Core Values

In the past 5 years living standards in Hong Kong have been rapidly deteriorating with "Butchered Flats" (as opposed to the more played down term "Sub-divided Units" SDU) mushrooming all over the city. Private property prices have risen to an unprecedented level where affordability can only be matched by outrageously shrunken flat sizes marketed for "singletons" only. Such will have a long term effect to the structures not just on the urban fabric but our social composition as well. The consultation paper has a large section on singletons (Chapter 5) but the overtone seems to "accept" this as "fact" rather than to review it as our demographic policy. Is this a "long term" trend we wish to pursue or even encourage? Do we accept this as fact **just to meet the housing supply quantum with less area allocated per household**? Do we still treasure **"family" as our basic core social unit** in Hong Kong (seems to be suggested in our taxation structure)? What is the vision for our future "homes" as oppose to "housing"? The lack of "humanity aspect" in this somewhat mechanical number-crunching consultation paper is worrying that the "Housing Strategy" per se is being taken too literally as a flat-counting exercise singled out from a much wider social context.



香港建築師學會  
The Hong Kong Institute of Architects

### Gist on HKIA Position on Long Term Housing Strategy (Continued)

#### 3) Lack of Consideration of the Economic Cycle Factor

In analyzing the demand and supply conditions of housing, the reference figures have not addressed the fact that we are currently at historical all-time high in terms of consumer price index and tender price index. If this were to be viewed in a wider historical context, a “**major correction**” would be unavoidable at least once within the 10-year study period of the LTHS paper. Such would have an implication in the **private / public housing ratio** and the need to re-evaluate the role of property as investment and property as dwelling. In the current consultation paper, a “hindsight” report on negative equity phenomenon in 1998-2003 is elaborately shown in Para. 2.5 to 2.9 which seems to try to justify the SAR Government’s inaction on housing provision in the past 5 years. Yet, there is a lack of a more forward-looking perspective with a scenario based on the past experience on economic down turns, so that Hong Kong could be much better positioned and buttressed to ride the tide with both ups and downs of the economic cycles.

#### 4) Polarization of the Housing Market

Fuelled by the rocketing property prices and rapidly depleting affordability, the current housing market is extremely polarized along the private / public realms. Constrained by financial reasons the sandwiched middle class has **extremely limited housing choices**. This is an unhealthy situation. Private sector participation, mixed developments with an affordable housing clause in new private residential lot leases and repositioning the roles of Housing Society as well as the Urban Renewal Authority could be viable options.

#### 5) Regulating Butchered Flats (Sub-divided Units)

After over 40 years of hard work by the Housing Authority to continuously improve living standards of the low-income families, the proliferation of Butchered Flats in recent years is a shame to Hong Kong despite the total clearance of urban squatters in the new millennium. HKIA recognizes the urgent need in bringing such urban blight back to an acceptable safety and hygienic standards by regulatory control but this license could only be a short-term interim policy which must have a clearly stated policy end-date. The licensing approach must not be perpetuated as a long term policy. In the long term, butchered flats with substandard living quality must be phased out.

The Hong Kong Institute of Architects  
December 2013



## 小中產同盟 SMALL MIDDLE CLASS ALLIANCE

敬啟者,

以下是敝盟對以上諮詢文件內的個別問題提交意見:

### 問題 1

你對長遠房屋策略應以供應主導，及在新落成單位中，公營房屋（包括公屋和資助出售單位）

的建屋量佔較高比例這項建議有何意見？

答覆:

公營房屋 80%。

在未來十年存活人口相對現時將會增加約五十萬，基於個人財力問題對公營房屋需求比對現時更會大於私營房屋。

私營房屋 20%。

### 問題 2

你對推算長遠房屋需求所採用的原則和方法有何意見？

答覆:

計分制要調整如下:

1. 更改及提高居屋和公屋的上限收入條件。
2. 加入，計算申請人與其家庭人員(夫妻，喪偶或單身者)在港居住的總年數。
3. 給予在職貧窮申請人額外分數。

### 問題 5

我們需顧及在推算期開始時私營市場的空置單位數目(約 48 000 個)我們推算出未來十年總房屋供應，

應介乎 440 000 個至 500 000 個單位之間，建議供應目標為 470 000 個單位(中點數)。

答覆:

基於未來十年人口將會增加建議供應目標至少為 600 000 個單位。

### 問題 11

你對推行發牌或業主登記制度以規管住宅樓宇和綜合用途樓宇內的分間樓宇單位這意見有何看法？

答覆:

需要，這個有助住屋安全及環境衛生。

## 小中產同盟 SMALL MIDDLE CLASS ALLIANCE

### 問題 12

你對在發售每期居屋時，預留某個比例的單位予單身人士這意見有何看法？

答覆:

30%，基於現時至未來十年內的嚴重住屋及低收入問題導致市民日漸遲婚從而衍生成大量的單身人士。

### 問題 14

以下各項計劃重推與否，社會上意見紛紜：(b)為首次置業人士提供經濟資助。你有甚麼看法？

答覆(b)

先免地價、免首期，償還樓款可參考政府的「中小企特別信貸款保證計劃」方式，跟銀行合作，政府担保七成

銀行承擔三成，兼對申請人作出還款能力評估、供款期數及最終審批決定。

### 問題 15

你對訂定檢視配額及計分制下申請者的入息和資產的機制及進行定期檢視，從而剔除輪候冊上

不合資格的申請者，這項建議有何意見？

答覆:

贊成。現時計分制有不善之處有影響到有真正急切需要公營房屋的申請人及家庭。

### 問題 16

你認為應否檢討和更新富戶政策（例如縮短首次申報入息的期限及其後申報入息及資產的期

限；只要住戶的入息或資產水平其中一項超逾相關限額便要遷出公屋；或除了以現行的入息

及資產限額作為準則外，進一步設置額外準則，當住戶的入息超逾某個界限，則不論其資產

水平，均須遷出公屋單位)？

答覆:

應該，因為現時制度不合時宜，但對於「進一步設置額外入息及資產限額」的準則，

## 小中產同盟

### SMALL MIDDLE CLASS ALLIANCE

申報入息的期限及其後申報入息及資產的期限；特別是入息及資產限額 貴會一定要小心釐定。

另，日後要是那些遷出公屋單位人仕符合那時的入息及資產限額可否再度申請公屋？

#### 問題 18

打擊濫用公屋的措施

答覆:

現時濫用公屋問題一直存在，為查出現時懷疑濫用公屋人士可採用:

1. 在凌晨 3 至 6 時間在公屋邨內的月租停車場進行特擊巡查，察看有否名貴房車停泊。如有發現，
  - 可循運輸署的登記冊內追溯登記車主，從而可對該車輛持有人(若為公屋租用戶)的資產值作出有否超逾入息或資產上限的評估找出有否濫用公屋的情況。
2. 對於現時已實行的，從單位的用電量著手評估是否仍有租戶住在內，需加強執法力度。

#### 問題 20

為加快房屋供應，你認為政府可再進一步推行什麼措施，以促進房屋發展？

答覆:

1. 批准擁有居屋的業主，可以將部份房間出租，所收租金的三成給予政府作為當時購屋地價優惠的補償；
  - 餘下的七成跟據物業稅例繳稅。
2. 善用現有公屋地下空置房屋的資源，給低收入人士當中轉屋暫時性住屋。
3. 在全港巴士總站加上蓋興建公營房屋。

#### 問題 21

在房屋土地供應緊絀的情況下，你是否願意為增加房屋供應，而就相對交通、人口密度和環境等方面可能出現的影響作出取捨，及接受適度提高地積比率，以增加房屋供應？

答覆:

是，可以接受。

## 小中產同盟

### SMALL MIDDLE CLASS ALLIANCE

#### 問題 22

你認為應如何在發展和保育之間取得平衡？你對本章所述不同的增加房屋土地供應方法有何意見？

答覆：

1. 政府加快進行收購前政府人員的合作建築樓宇改建公營房屋，以業主舊樓的實用面積

轉換新樓的相同實用面積，多除小補。

2. 取消私人會所用地改建公營房屋。私人會所用了公家的緊拙資源只供一小撮人仕使用，政府的這種劣政

應該馬上糾正。要求政府即時採取行動對那些將滿合約的不再續約，那些可以解約的就發出通知。

3. 香港已有一個十分成熟及交通方便的沙田馬場，所以政府應該拆掉或搬遷跑馬地馬場

這一個不合地理環境的龐然大物將其重建於其他他區如：將軍澳堆填區或元朗區；

在扣除拆卸或重建的所有有關費用後；所得的賣地收益用於建設公營房屋。

謝謝！祝

貴會同寅身體健康、工作愉快！

“小中產同盟” 主席關德華謹啓

(已簽署或已印章)

Thank you and best regards,

Kwan

Office phone: 852 2419 1622

Mobile phone:

Skype:



THE HONG KONG INSTITUTE OF  
SURVEYORS

香港測量師學會

2 December 2013

By Fax:  
E-mail: lths@thb.gov.hk  
& post

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

Dear Sirs,

**Long Term Housing Strategy Consultation Document**

On behalf of the Hong Kong Institute of Surveyors (HKIS), I have much pleasure in submitting our views and suggestions on the Long Term Housing Strategy consultation launched recently.

**A. Housing**

1. The HKIS is in support of the proposed housing supply of 470,000 units for the next decade to meet i) the housing need of increasing population and/or number of households; ii) improve the housing quality particular for those living in subdivided units or multiple-household flats; and iii) prevent surge of property price due to serious shortage of housing supply.
2. The Government should provide adequate and affordable flats through provision of more public rental housing (PRH) for the grassroots and Home Ownership Scheme (HOS) flats for the low to middle income group who are not eligible for PRH and cannot afford to buy private flats. Increasing the Public (PRH plus HOS) / private split to 60:40 level is reasonable in view of the huge demand of subsidized flats. The public / private housing portion can be adjusted when the market, economic and social situation change.
3. With number of singleton families increasing, more resource should be put on accommodating non-elderly one-person applicants who are above a certain specified age, say 35.
4. Second-hand market of assisted housing can be a source of flat supply. The Government should review its HOS policy to make HOS owners more willing to sell their flats to eligible HOS buyers so as to improve the sustainability of this sector of market and enhance the efficient use of land resource. The Government should also explore the possibility of adopting other more fair and equitable means of allocating HOS to applicants based on needs rather than luck.

香港上環干諾道中111號永安中心12樓1205室

Room 1205, 12/F Wing On Centre, 111 Connaught Road Central, Sheung Wan, Hong Kong

Telephone: 2526 3679 Facsimile: 2868 4612 E-mail: info@hkis.org.hk Web Site: www.hkis.org.hk

5. Re-launch of housing loan or mortgage repayment subsidy at this point of time is not supported as it will induce housing demand and therefore push up the housing price further.
6. Re-launch of domestic rent control is **not** supported as it will discourage landlords from renting their flats in particular if they are not holding the flats for long-term investment and is contrary to the norm of a free capital market. It will also discourage the landlord from maintaining his flat in a proper manner if the rent received from the existing tenant is much lower than what they can get from a new tenant.
7. The Government should think and come up with some creative solutions for flat supply in the longer term in collaboration with the adjoining region in particular when traffic improves in 2023 and beyond.

#### B. Sub-divided units and Maintenance of Residential Flats

1. The Institute acknowledges the function of sub-divided units (the "SDUs") in satisfying the present housing need of the Hong Kong Society at large, in particular, the low-income families and eradication of all SDUs is not practical and realistic. However, we note the safety and hygiene conditions of many SDUs are far below the acceptable level which requires immediate improvement.
2. Noting the great hardship to meet the prevailing requirements of the Building Regulations, we strongly suggest the Government to formulate a separate set of interim design and construction requirements allowing certain degree of concession of the current Building Regulations requirements to gauge the standards of improvement works. We see a pragmatic approach should be adopted to allow more SDUs could be preserved after necessary improvement. In view of the compromised standard of most SDUs, we consider licensing or registration is not an appropriate means to regulate the SDUs. Instead, a validation scheme may be more practical to encourage improvement of sub-standard SDUs alongside with strengthened enforcement actions by the government with a view to phase-out the sub-standard SDUs in long run.
3. In parallel, sufficient transitional housing is required to accommodate SDU tenants affected by the improvement works or government enforcement actions by way of temporary buildings at unallocated government land or conversion of other vacant government buildings or extension of existing public housing buildings.
4. In long run, we urge the Government to set out a clear policy to promote design and provision of small residential unit for singleton and elderly persons.

香港上環干諾道中111號永安中心12樓1205室

Room 1205, 12/F Wing On Centre, 111 Connaught Road Central, Sheung Wan, Hong Kong

Telephone: 2526 3679 Facsimile: 2868 4612 E-mail: info@hkis.org.hk Web Site: www.hkis.org.hk



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5. The HKIS also notices that a number of existing old residential buildings which have yet reached its economic life are lack of maintenance and quickly becoming dilapidated that would reduce its attractive in the second hand property market and hence the supply transactions. The situation is worsen under a cyclic action where the dilapidation is accelerated making redevelopment of building is the only solution, this would cause lots of existing old buildings stacked in the market with lower utilization rate or become unauthorized sub-divided units.
6. As a crucial part of the Long Term Housing Strategy, we advocate that the Government should pay greater attention to improve the quality and social, environmental and economic sustainability of existing housing. To this end, it is of paramount importance for the Long Term Housing Strategy to set out directions for the Government to enhance health and safety standards, improve energy performance, achieve greener environment, promote building maintenance and improvement and build stronger community, both for existing private and public housing.

### C. Land Supply

1. **Execution of the Housing Policy and Regular Review**  
More housing supply would mean more housing land demand. The HKIS is concerned about how the 470,000 units housing target set out in the strategy could be executed in view of the shortage of land supply in the next decade. We urge the Government to review and implement all the possible land supply proposals including new towns development in order to secure sufficient land for housing development. On the other hand we also request the Government to conduct regular review of the target to reflect the actual situation of housing demand from time to time.
2. **Review of Plot Ratio**  
In view of the strong demand for land support to meet the housing supply, the HKIS supports the review and increase of plot ratio where appropriate, particularly in new towns.
3. **Utilization of Green Belt Area and Reclamation**  
Use of existing green belt sites can potentially provide sizable and ready-to-use land for the society and is worth detailed consideration and planning. While new town development in the New Territories still faces lots of problems and objections and land support is uncertain, reclamation of land outside Victory Harbor is an option to choose. Reclamation would take time and we urge the Government to materialize the reclamation proposal that put forward recently.



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The above gives a broad outline of those issues. We sincerely hope that these ideas and proposals will be further explored. We are more than pleased to share our views with you. Please contact HKIS Secretariat on 2526 3679 if you require more information or would like to set up discussions on the above views.

Thank you for your attention.

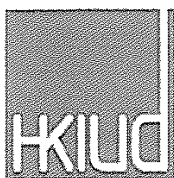
Yours faithfully,

**(Signed)**

Sr Stephen Lai  
President  
The Hong Kong Institute of Surveyors

Cc: Sr Tony Tse, Legislative Councillor (Fax no.: )





香港城市設計學會  
Hong Kong Institute of Urban Design

**Response from the Hong Kong Institute of Urban Design on:**

**“Long Term Housing Strategy: Building Sustainable Homes”, Consultation document September 2013**

The Hong Kong Institute of Urban Design considers that housing policy should form a major part of a long term ‘Vision’ for Hong Kong, which addresses the aspirations of the population in terms of quality of life issues and the competitiveness of the city in terms of international living standards. The ‘Vision’ should encapsulate strategic thinking for comprehensive land use change based on technological advances beyond the first half of the 21<sup>st</sup> century. The Institute is in general support of the main objective of the consultation document that every household should be adequately housed. Such an objective, however, should be considered within the context of a long-term vision. The proposed policy document outline measures should therefore look beyond the proposed ten year period, which, in planning terms, is quite a short time period.

The HKIUD wishes to highlight the following issues in considering any future housing policy:

**1. Promote diversity in housing type and tenure**

A sustainable and inclusive city consists of mixed and well-integrated districts and areas. Housing of different type and size will offer choice, and provide mixed demographic populations, with varied age and income groups. The people on the cover of the consultation document are all unique individuals; let’s not give them the same housing units to choose from!

A wide variety in type and size will also enable ‘aging in place’, which, although mentioned in the consultation document, should be a starting principle.

**2. Increase focus on quality**

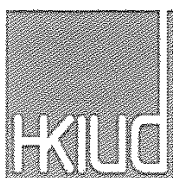
There is scant mention of ‘quality’ in the consultation document, nor a convincing description of what constitutes a ‘sustainable city’. Hong Kong has a long track record of implementing large scale public housing, however recent examples, as seen at Tin Shui Wai and Tseung Kwan O have demonstrated that the traditional planning and implementation strategy has been deficient in meeting the current or future needs and expectations of citizens.

**3. Promote mixed-use society**

A sustainable community is not monofunctional, but a mixed-use and well-integrated society. Housing should be integrated together with significant employment opportunities, varied community and leisure facilities, life-long

Hong Kong Institute of Urban Design Limited

香港金鐘金鐘道89號力寶中心第二座22樓2207-9室 Suite 2207-9, 22/F, Tower Two Lippo Centre, 89 Queensway, Admiralty, Hong Kong  
Tel: (852) 2530 8135 Fax: (852) 2530 8100 Web: www.hkiud.org Email: inq@hkiud.org



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education and training facilities and an overall focus on health and wellness issues, where people do not have to travel great distances and can easily access open space. Activation of streets will result in vibrant areas. Large, monofunctional housing areas targeted at specific social sectors is a misguided development model and creates long-term and wide-ranging structural problems.

#### **4. Implement phased development**

Construction of large-scale building projects within a short time frame leads to collective deterioration. This can lead to rapid neighbourhood ageing and put severe stress on future maintenance budgets. Rather than building large-scale 'green field' sites we promote maximizing options within the existing built environment.

#### **5. Open up public space**

High density does not equate with a lack of public open space. Well-designed districts provide high quality and varied public space in close proximity to housing. A focus on the quantity of housing ignores the fact that the space in between the buildings is as important. A good sense of place using good design will enrich people's lives and add long-term value to the housing stock.

#### **6. Allow adaptive reuse of industrial buildings**

Industrial buildings can be a great resource for quality housing. There are a number of specific issues but numerous examples around the world show that these can be overcome and that there is a market for converted industrial buildings. Adaptive reuse saves demolition cost and waste, and will add variety to the townscape.

#### **7. Review the current Building Regulations and Outline Zoning Plan**

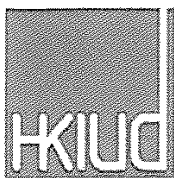
Current development control does not stimulate well-integrated mixed-use communities and should be overhauled. As a pilot, exemption of development control can be considered in 'special development districts' to promote diversity, flexibility and creativity.

#### **8. Allow flexibility in housing design**

A number of alternative housing solutions can be implemented, for example temporary housing, to provide variety and find affordable solutions. An emphasis could be placed to develop quality low-cost housing with shared facilities.

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香港金鐘金鐘道89號力寶中心第二座22樓2207-9室 Suite 2207-9, 22/F, Tower Two Lippo Centre, 89 Queensway, Admiralty, Hong Kong  
Tel: (852) 2530 8135 Fax: (852) 2530 8100 Web: www.hkiud.org Email: inq@hkiud.org



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#### **9. Encourage maintenance of the existing housing stock**

Currently there are 2,599,000 housing units. A strategy should be devised to utilize these assets as best as possible. Obviously the state of this stock will affect the need for new housing units. In this context the need for accurate predictions for population growth or decline, and hence households, is very clear. Perhaps more can be done to promote maintenance and renovation of older buildings, which would also stimulate aging-in-place. Many tenement blocks from the 1960s, for example, are structurally sound whilst the older cities worldwide demonstrate the benefits of long-term retention of their building stock in nurturing cultural identity and collective memory. Such retention would decrease forced displacement, whilst positively adding to the visual character of Hong Kong.

#### **10. Prioritise pedestrian and bicycle traffic**

New districts should be planned with a priority for pedestrians and bicyclists (and other non-motorised traffic) and public transport connectivity. Private vehicles should be deterred through restricted parking allowance and access.

#### **11. Mandate urban design in the planning process**

A city is a complex entity and the planning and designing of it requires different skills and disciplines. Urban design bridges a gap between town planning and architecture and, as such, should form a part of the development process at every stage.

#### **12. Develop space standards**

It is clear that too many citizens are forced to live in very small rooms and flats. Minimum space standards should be implemented to safeguard people from unlivable conditions.

HKIUD

PAC 2 December 2013

Hong Kong Institute of Urban Design Limited

香港金鐘金鐘道89號力寶中心第二座22樓2207-9室 Suite 2207-9, 22/F, Tower Two Lippo Centre, 89 Queensway, Admiralty, Hong Kong  
Tel: (852) 2530 8135 Fax: (852) 2530 8100 Web: www.hkiud.org Email: inq@hkiud.org

### 回應長策諮詢文件

基督教家庭服務中心鯉魚門社區服務處自1979年7月開始受政府資助，在鯉魚門寮屋區內提供服務予有需要人士，透過社區及小組活動協助他們關心社區事務，並處理個人及集體面對的問題，服務對象包括獨居長者、新來港人士、婦女及低收入家庭等。

寮屋居民一向被社會忽略的一群。隨著社會高度城市化，不少寮屋村落的土地被政府重新規劃而發展，昔日鑽石山的大磡村，將來新界東北寮屋村落，全港寮屋數量正逐漸減少。對於仍然需要在寮屋生活的居民來說，有部份居民，因居住環境欠佳及家庭經濟能力有限，他們選擇輪候入住公屋；有部份居民，因為喜歡村內的鄉土人情，而選擇留守家園。然而，這份諮詢文件，未能為寮屋居民帶來遠景。

#### 未能照顧寮屋居民的上屋需要：

諮詢文件指出的「臨時構建物」，屬居住環境欠佳的住所類別，按文件指出，估計2011年全港有18500戶居於這種「臨時構建物」，數字是包括寮屋和天台屋。但我們對這個估算是存疑，翻查前發展局局長林鄭月娥女士於2010年7月7日回覆立法會查詢的文件中，提及當時全港供居住用途的已登記寮屋有85574個。除非我們大膽地相信這些住戶，平均每戶佔用4.5間寮屋。否則，我們懷疑局方估算的真確性，或試圖談化寮屋居住的居住需要，以舒緩建屋壓力。

就我們所知，新遷入寮屋區居住的家庭，他們普遍正輪候公屋，或合資格卻未提出申請。他們經濟條件弱，居所較為擠迫，居住面積常少於5.5平方米，即低於公屋人均居住面積，加上設施簡陋。所以，他們殷切地需要藉入住公屋而改善居住環境。故此，我們要求增加公屋供應，真正縮短輪候時間。其次是提高公、私營房屋比例，公營房屋應由建議的6成提升至7成。

#### 過時的寮屋管理政策：

為了凍結寮屋及人口增長，政府最後一次於1982年進行全港寮屋登記，及在1984年進行寮屋人口登記。並且規定寮屋如有需要進行結構翻新或維修時，必須使用原有物料，即是磚塊建的寮屋，要使用磚塊，鐵片建的，就要用鐵片，木建的，要用木。換言之，寮屋修葺後的尺寸、材料、位置及用途，須與原貌相同，否則寮屋會被地政總署清拆。有關措施是上世紀七八十年代訂定，至今已有30多年。隨著社會轉變、建築用科日新月異，當年廣泛地使用石棉瓦，今天已不被使用。難度要居民找新的石棉瓦代替舊的？這豈不是苦了居民，害了社區健康？因此，

就寮屋維修一事上，應與時並進，作出全面檢討和修改。

我們建議：一. 放寬寮屋維修物料限制，使居民能在結構安全的寮屋繼續生活，有關部門可以與工程界的專業人士進行研究，推薦適合本地使用的寮屋物料；二. 仿效舊樓維修，為經濟有困難的寮屋居民設立免息貸款計劃或資助計劃，使他們有足夠金錢為居住的寮屋進行維修，避免寮屋倒塌而造成人命傷亡及財物損失。

如需進一步了解或查詢，歡迎致電23463680，或電郵至：[leiyuemun@cfsc.org.hk](mailto:leiyuemun@cfsc.org.hk) 與本服務處聯絡。

撰寫：基督教家庭服務中心鯉魚門社區服務處

日期：2013年12月2日

致長遠房屋策略督導委員會：

公屋被迫遷戶關注組是一群受現時所謂「寬敞戶」政策影響的公屋居民所組成，我們認為現行所謂寬敞戶政策根本不能有效運用公屋資源，甚至為公屋居民帶來嚴重問題和影響！對於長遠房屋策略，關注組有以下意見：

#### 違反施政理念，令民生倒退

特首梁振英多次在政綱和公開場合提過：「……逐步提升最低公屋編配面積標準，以改善公屋居民的居住環境」。但寬敞戶標準卻是不斷收緊，據房署回應，甚至有機會回到 1992 年的寬敞戶水平？此政策根本與梁振英政綱背道而馳，社會應該不斷進步，人民生活應該不斷改善，相反居住標準現在竟然不斷收緊！

#### 寬敞戶問題源於政府，居民無辜受害

在現時的公屋住戶中，很多是經歷以前鹹水樓、26 幢公屋問題、重建的災民，當年他們因為配合政府重建、拆卸而被迫搬遷到現時的單位居住；另外一些地區如東涌、天水圍區，政府當年為了發展，是刻意編配比當時標準較大的單位予這些居民，甚至明知這批「新」上樓的住戶將有輕微人口變動（家庭成員過身），而刻意編配這些單位予居民，並承諾居民不會因為輕微人口減少而要再搬遷。怎料房署突然於 2007 年訂立「最嚴重寬敞戶」標準，並逐步收緊標準，要受影響居民強行調遷。結果，隨着時間流逝，陸續出現因為輕微人口減少而成為「寬敞戶」的公屋居民；再者，為何房署就不曾檢討寬敞標準是否合理，反而繼續運用此標準要求居民強行調遷（即使明知按此標準執行會令更多公屋居民陸續成為寬敞戶），難道政府明知道新建公屋不足，而不斷用收緊各種標準，促進公屋流轉，讓更多公屋居民因為各種理由而要調遷甚至回收單位，製造更多可供調遷單位，慢慢取代新建單位，成為輪候冊上可供編配單位的來源，於是不計代價，將公屋居民冠以「寬敞」的罪名，迫遷他們！

#### 將房屋問題轉移視線、分化居民

長策會文件中以「充分和合理運用公屋資源」為由去收緊富戶、寬敞戶政策，意圖將社會上劊房戶、上樓慢等問題歸咎於這些公屋居民，但實情是政府一直偏袒大財團地產商，容許他們屯地自肥！文件完全沒有處理香港高地價的問題，只是向現有公屋居民開刀！上述問題成因是由於政府沒有增建公屋、假自由市場之名放任樓價、地價飆升、令輪候公屋需求愈來愈多。但政府根本沒有長遠解決問題的決心，卻把問題轉移在公屋居民身上，甚至分化他們，逃避責任！

#### 與現行政策自相違背

文件中多次提及政府希望讓市民安居、協助長者建設家園，但文件竟然認同房委會不斷收緊寬敞戶標準、甚至建議收緊富戶居住權，這樣連公屋的長者戶也不能幸免受到影響。眾所周知，富戶政策已經長期為人咎病，因為它變相鼓吹年青家庭不再與長者同住和照應，否則受到懲罰性的租金。而寬敞戶標準的肆意收緊更是違反公屋居民安居的基本需要！因為居民一旦被定義為「寬敞」後，便要接受房署調遷，否則會被取消租約，使居民難以安居。但

文件竟然鼓勵進一步政府收緊富戶和寬敞戶政策，實在與政府希望讓市民居家安老的理念自相違背。

#### 公屋的編配標準非常不合理

現時房署編配只以人均不少於7平方米為合適，相比之下，寬敞戶的單位就顯得較「寬敞」了。但該標準是包括廚房及廁所，我們認為如此計算是不合理的，因為廚房及廁所不應作為生活空間的部分計算，即使現時一人寬敞戶的標準是超過30平方米，並當中是包括廁所和廚房，如果扣除廁所和廚房去計算，實際住戶只有20平方米左右的生活空間。再者，其實現時並非寬敞戶住得「寬敞」，實際上是公屋編配標準太細了！按現時標準，一個21.12平方米的單位是可以容納3個成員，若扣除廁所和廚房後的「空間」難道真的適合3個人生活嗎？同樣地，現時一人「寬敞戶」按現時所謂「合適」的標準是需被調遷至約13-18平方米的單位，扣除廁所、廚房後的空間正正突出現時公屋編配標準的不合理！

#### 壓縮住屋標準，製造不必要的單身公屋需求，減慢單身人士上樓

更一步趕走更多公屋居民，亦不見得能解決到一人單位不足的問題。以「寬敞戶政策」為例，由於政府不斷收緊寬敞戶標準，以致近年不斷出現新增的「寬敞」住戶，政府公布需調遷的寬敞戶共有20581個，即使寬敞戶十年內不再增加（但政府卻不斷收緊標準製造更多「新」寬敞戶）、並全部遷出，平均每年也需要2058個1人單位，而房署也承認每年需要額外預留一千個公屋單位予寬敞戶調遷。這樣平白令1人單位更為緊張，即使政府將45歲以上單身輪候人士「加分」亦無補於是。

#### 破壞公屋居民安居

確保市民「安居」是政府最基本的責任，即使在文件也多次提及希望令市民「安居」、「建設家園」等等，但是，政府一方面鼓勵人安居，但另一方面又收緊富戶、寬敞戶政策令更多公屋居民被不必要地搬離自己長年的家，這種做法連最基本使人安居也做不到，反而不斷污名化公屋居民，將現時所謂「富戶」、「寬敞戶」打造為「不充分合理運用公屋資源」的一群，但卻沒有審視現行富戶、寬敞戶標準是否合理？只是不斷壓縮公屋居民居住權利，破壞家園！

關注組有以下建議：

1. 我們反對這種強制迫遷的政策，公屋居民應享有基本居住權，政府在執行所謂寬敞戶調遷時應該讓居民自由選擇調遷，而非強制調遷
2. 應檢討現時公屋居住面積和編配標準
3. 長遠增建公屋，真正解決輪候冊問題，而非不斷迫遷公屋居民

公屋被迫遷戶關注組  
2013年11月29日

聯絡人：義務幹事 黎治甫 (電話： ; 電郵： ; )

香港九龍何文田佛光街 33 號  
 房屋委員會總部第二座 1 樓  
 長遠房屋策略督導委員會秘書處

我們 Better Home For Our Children 是由一群居住在中西區的少數族裔人士所組織成的團體，一直致力改善少數族裔人士在港的住屋問題，希望能為我們的下一代爭取到合理的居住權益。我們大部份是巴基斯坦籍人士，也有印度及尼泊爾籍。我們多住在中西區內一些舊型樓宇的小型單位或劏房之內，環境十分擠迫。

我們跟其本地人士一樣，希望透過申請公共房屋來改善住屋環境，但因穆斯林的傳統文化及宗教信仰，在申請過程中出現一些特殊情況，以致未能配合。

一般巴基斯坦家庭人數眾多，平均超過 5-6 人；另外規定即使成年後但未婚的子女仍需與父母同住，使家庭空間更覺得擠迫，但現時大型單位公屋卻不多，令致往往等超過 3 年或以上。

巴基斯坦籍人士信奉伊斯蘭教，不能隨便進食肉類，只能購買在特定店鋪的清真肉類，而這些店鋪為數不多，只集中在灣仔及尖沙咀區，亦即在各大伊斯蘭廟附近；再者每個星期五，男士都要到伊斯蘭廟誦讀可蘭經，所以希望可以搬近市區，以免影響日常生活及健康。

少數族裔人士跟本土人士一樣想透過公營房屋這個系統來解決住屋困難，更希望立法會可以向政府反映，能體恤穆斯林文化及宗教背景給予我們特殊安排。

- 由於現時的公屋面積均偏向適合較細小的核心家庭，一般的大家庭申請者的等候往往比較細小的家庭更耐的時間，建議可否讓他們入住相鄰的單位？
- 此外，由於部份巴籍人士語言不通，需要同鄉協助翻譯，所以我們多住一起或同區。為此我們請求房屋署能公開各屋邨內相同種族的入住人數，讓我們在獲編配時可考慮是否接受有關單位。
- 在未編配公屋單位前，能給予租金援助，使我們能安心等候。
- 懇請立法會議員能會督促政府重新檢討業主與租客(綜合)(修訂)條例，重新設立租金管制，讓我們可以應付不斷上升的租金。

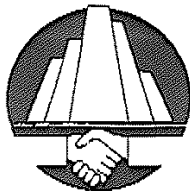
為使各議員能深入明白及關注少數族裔人士就公屋編配和輪候時間的事宜我們的關注及解決方法建議，我們現特函 邀約 陳家洛議員、何秀蘭議員、葉國謙議員、葉劉淑儀議員、王國興議員於申訴部直接與我們會面作討論。如對本小組意見有任何疑問，煩請致電與譚安業先生聯絡或透過傳真 28168022 代轉。

專此，敬頌  
 台安！

Better Home For Our Children  
 少數族裔人士住屋小組  
 啟

2013 年 3 月 15 日  
 聯絡處：堅尼地城蒲飛路 27 號  
 聯絡人：譚安業





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HONG KONG INSTITUTE OF REAL ESTATE ADMINISTRATORS

Ref: HIREA/L13015

2 December 2013

(By Fax: )

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

Dear Sirs,

On behalf of The Hong Kong Institute of Real Estate Administrators, I would like to present some feedback to you as below:-

Introduction

The housing problem in Hong Kong has recently become one of the most daunting tasks for the Government to resolve, given the intricate nature of this problem and the ever-changing economic and social environment. The huge number of Public Rental Housing (PRH) applicants, coupled with the angst of the disgruntled public against the backdrop of spiraling rises in property price, have set the scene for the Government to step in timely to resolve this problem by formulating a long term housing strategy (LTHS) as a once-and-for-all solution. We have reviewed the consultation document and would wish to offer the following comments on the LTHS.

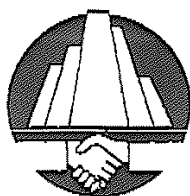
1. Comments on Q1

At present there are over 230,000 applications for public housing and about 74,900 inadequately housed households in the community. Given such colossal numbers, the current acute supply-demand imbalance, and high property prices, the Government owes the public an immense task of taking a proactive role in providing public housing (comprising PRH and subsidized sale units) to satisfy the huge housing demand of the public. We therefore support the Government to adopt a supply-led strategy for the LTHS with public housing accounting for a higher proportion of the new housing production. Having said that, this strategy should be regularly reviewed in order to appraise any changing circumstances warranting the Government to adjust its approach to dovetail with the changing situation.

2. Comments on Q2

The framework for assessing the long term housing demand using econometric modeling approach embarking on the relationship between household formation and economic performance and housing market situation is sophisticated and analytical. Notwithstanding this advanced modus operandi, there are so many variables and assumptions that might not materialize in the end. The Government should be mindful of the severe housing glut in 2002-2003 when a vast number of completed housing flats started to pour into the housing market as a result of huge land supply in 1997-1998. Such painful phenomenon has caused a chaotic housing slump, exacerbated of course by the SARS pandemic in the territory. On the other hand, an under-estimation of housing demand will cause a spiral increase in property price and rent leading to social discontent in our society. In cognizance of the volatility and the unpredictability of the property market, the interchangeability of PRH and Home Ownership Scheme (HOS) is considered as an essential buffer to assuage any spiral upward and downward trend in the property price. Therefore it is necessary for the Government to review the supply and demand situation annually.

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總務秘書地址 Hon. Secretary Address: 香港灣仔港灣道30號新鴻基中心2605室 Rm 2605, Sun Hung Kai Centre, No.30 Harbour Rd, Wanchai, HK

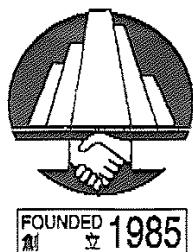


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3. Comments on Q3  
No comments.
4. Comments on Q4  
Housing market is a subtly sensitive market. It is extremely difficult to precisely project housing demand albeit the Government has adopted an advanced econometric modeling exercise to assist in predicting housing demand. Notably, whenever the property price falls or is expected to fall, the demand will simultaneously fall regardless of the real physical demand in our society. Likewise the demand will perk up whenever the property price rises or is likely to rise. Again, we support the Government to review the housing demand on a regular basis.
5. Comments on Q5  
We are supportive of the projected total housing supply target but have doubt as to whether the Government is able to provide sufficient parcels of land to meet the target. It is suggested that any shortage in land supply in the first few years should be compensated subsequently in the next few years to meet the housing target with close attention being paid to the actual economic situation with a view to adjusting the ratio of public and private housing supply as necessary.
6. Comments on Q6  
In view of the ever-aging population of our society, we need to take care of the housing need of the elderly. While the Housing Department takes care of the elderly in low income bracket, the Housing Society has successfully launched the Senior Citizen Residence Scheme (SEN) for middle income elderly. We support the Government to endow the Housing Society with the duty to provide such kind of housing schemes for the middle and higher income elderly. NGO and charity organizations could be invited to partner with the Housing Society to provide medical care services and recreational services for these elderly. Private developers should be encouraged to build housing for the middle and high income elderly under a market-driven approach.
7. Comments on Q7  
We support the proposal to increase the Public Rental Housing (PRH) quota for Quota and Point System (QPS) applicants and to allocate more points to non-elderly singleton applicants above the age of 45 provided that such move will not diminish the three-year Average Waiting Time (AWT) for the general applicants and the two-year AWT for the elderly. The arrangement could also be extended to those aged 40 and then 35 in view of their relatively limited upward mobility on their own if the Government could speed up the construction of public housing in the future.
8. Comments on Q8  
With reference to our comments in paragraph 7 above, we support the proposal to progressively extend the PRH three-year AWT pledge to non-elderly singleton applicants above the age of 35 in the long run. The Government should, however, make its effort to speed up the construction of singleton flats to cater for this arrangement.
9. Comments on Q9  
This recommendation is highly supported as it will generate more housing flats for singleton applicants in addition to the PRH units already committed. From the perspective of the best use of our scarce land resources, this proposal is laudable notwithstanding that this arrangement may provoke vitriolic altercations from local residents and political activists. Smaller flats could also be built in these dedicated PRH blocks to re-house those tenants in under-occupied flats so that larger flats could be re-possessed to re-house families with



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more family members. Such arrangement has the dual benefit of increasing the circulation of flats and best use of the PRH flats.

10. Comments on Q10

Not only suitable sites in urban area without other immediate use could be deployed to provide transitional housing for those in need, the Government could also deploy those sites in rural areas without immediate use for this purpose. The Government could also deploy those flats vacated for a lengthy period for re-housing those in need temporarily.

11. Comments on Q11

We support the proposal to introduce a licensing system to regulate the subdivided units (SDU) in residential or composite buildings. In view of the huge number involved, it is suggested that the licensing process should be simplified as far and as practicable as possible. A modality similar to the Minor Works Registration System adopted by the Buildings Department could be considered. At the same time, the Government should reinforce its enforcement action against those unacceptable SDU. Those residing in SDU should not be put in peril, nor should any safety standard be compromised. More flats for transitional stay should be built to accommodate those displaced by Government enforcement actions.

12. Comments on Q12

Although we support the proposal to set aside a certain proportion of flats in each Home Ownership Scheme (HOS) sale for singletons, the proportion should not be more than 10 per cent of the total number of the sale flats in order not to substantially reduce the chance of those eligible family applications.

13. Comments on Q13

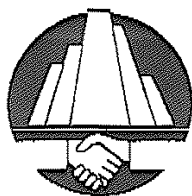
We support the Government in setting a minimum income/asset threshold for White Form applicants for future sale of HOS flats and other subsidized sale flats noting that it is unfair to those eligible first-time home buyers with genuine housing needs. This would also help minimize the market risk faced by those purchasers with low affordability.

14. Comments on Q14

- a. We are not in favour of re-launching the Tenants Purchase Scheme (TPS) in view of the fact that the HA has now encountered many problems in the management of residual PRH flats. After all, those who would wish to purchase a flat could still submit a Green Form Application for the purchase of a HOS flat, thus generating more available flats for other PRH applicants.
- b. We do not support the proposal to provide financial assistance to first-time buyers in view of the current hectic housing market. Nonetheless, this arrangement could be re-considered later on when there is adequate supply in the private housing market as such proposal can leverage on the market force to save the Government resources.
- c. We do not support providing the rent subsidy proposal, nor do we support the proposal to implement rent control. The former arrangement will likely spark off a rental increase in the housing market while the latter arrangement will evoke the landlords to be particularly fastidious in choosing their tenants, thus reducing the flats available in the housing market resulting in driving up rental level.

15. Comments on Q15

Bearing in mind the first priority of the Government is to assist those grassroots which are in greater need of assistance, we support the Government to develop a mechanism to regularly review the income and assets for QPS applications in order to remove ineligible applicants from the Waiting List (WL). A reviewing period of 2 to 3 years is considered appropriate.



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16. Comments on Q16

We support the Government to review and update the "Well-off Tenants Policies" with a view to setting an income or asset threshold, above either of which the tenant should be required to move out of the flats, enabling those in need to be housed as soon as possible. In addition, the reviewing period should be trimmed down from 10 years to 5 years after the tenant moved in.

17. Comments on Q17

We support the Government to further enhance its under-occupation policy by providing incentives for under-occupied households to move to smaller flats and stepping up its action against under-occupation cases. Nevertheless, the unsatisfactory implementation of the under-occupation policy is inextricably intertwined with the Well-off Tenants Policies, the objective of which is easily defeated through moving out of some income-earning members of the family, thus reducing their total income or asset so that the income and asset threshold will not be exceeded. To this end, the Government should holistically review the two systems so as to plug all loopholes arising therefrom. The Government should also speed up the construction of smaller flats, aiming to provide sufficient number of flats to re-house those living in under-occupation flats. Alternatively, the Government could investigate the benefits of encouraging cross-generation living by means of, say, increasing the income and asset threshold of a family if there is a cross-generation living in the under-occupied household. In effect, this is a way to enhance family harmony in our community.

18. Comments on Q18

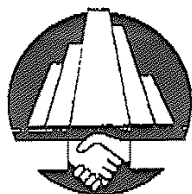
Given the huge number of WL applications for PRH, we opine that currently there is not much room to further relax the standard for relieving overcrowded PRH households. The first priority should be to deal with the PRH applicants with a view to improving the living environment of sitting tenant later on.

19. Comments on Q19

Before 2002, the Private Sector Participation Scheme (PSPS) had gone hand-in-hand successfully with the HOS to provide subsidized housing to the public. Now that the HOS has been resumed, the Government should actively consider resuming the PSPS as it could offer a supplement to the HOS, not to mention its benefits of flexibility, harnessing the market force in implementing the housing policy of the Government and shouldering and somehow releasing the housing burden of the Government.

20. Comments on Q20

The land development process involves essentially three Government Departments, viz. Planning Department, Lands Department and Buildings Department. Both Planning Department and Buildings Department are under the scrutiny of statutory periods for the processing of town planning applications and building approval/consent and occupation permit applications respectively. Understandably, matters arising from land administration are intricate and sophisticated, leading to a prolonged process in dealing with land exchange, negotiation of premium and other matters relating to the processing of MLP, DDH and CDA matters etc. It should be instrumental to the public if Lands Department could consider some methods to govern the early processing of these matters. The Government should consider overseas experience in the current shortage of manpower supply in the construction industry. Singapore and Macau have exemplified that it is viable to import overseas workers to compensate for the acute shortage in certain categories of building trades without damaging the employment prospect of local workers. Perhaps the Government could consider importing overseas workers for Government housing projects only so as to save the Government coffer. This in effect could also spare the acute labour shortage in the private housing sector. The



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Government could also take a multi-pronged approach in encouraging employers to provide more training, promotion prospect and other fringe benefits in addition to increasing the salary package of local workers so as to encourage more suitable cadres to join the construction industry.

21. Comments on Q21

In view of the acute shortage of housing land supply, a trade-off between increasing in plot ratio to enable more flat production and negative impacts on traffic, population density and environment appears inevitable. Instead of adopting a low plot ratio across the board for the entire development area to account for the inadequacy of infrastructure capacity, Government should adopt a higher plot ratio for sites in the early stage of development, and keep the remaining sites in the land bank. Such sites will only be developed when the infrastructure is upgraded in future. Under the same token, the Government should set up a re-development programme for its old housing estates with a view to unleashing their development potentials especially those estates surrounding the old Kai Tak Airport area where its development potential was inhibited by the former Kai Tak Airport.

22. Comments on Q22

We are grateful for the various measures taken by the Government in resolving the chronic shortage of housing supply. How the Government should strike a proper balance between development and conservation is extremely difficult. Apart from implementation of environmental compensation packages and mitigation measures for every building development, the Government should holistically involve in the protection of our environment in new and existing development areas. With rapid technological advancement in recent years, the Government could build in certain environmental features in new building developments and re-developments.

**Conclusion**

We cannot close without extending our gratitude to the Steering Committee for compiling such a comprehensive set of consultation documents that could form a remarkable road map for the LTHS in resolving the current acute shortage of housing supply. The views in the document are visionary and incisive. While there is no panacea to resolve the housing problems completely, we are staunchly upbeat that the Government can achieve its policy missions to assist the grassroots to meet their housing needs, provide subsidized home ownership flats to build a progressive housing ladder, encourage property ownership, and to maintain a healthy and steady development of the private property market in the years to come.

Yours sincerely,

(Signed)

Kyran Sze  
President

致 長遠房屋策略督導委員會：

人口和房屋需求息息相關 香港承载力已超標  
47 萬個建屋目標 = 587 座樓 繼續盲搶地？  
控制人口增長 調低建屋目標 減少持分者犧牲及撕裂

從人口承载力的角度，不少香港人覺得現時相當擠逼，超出交通及房屋負荷。若未來新移民來港數目不變，則未來 16 年再有另外 80 萬人來港，或未來 10 年有 50 萬人來港。

現時三個政府建議的新發展區，包括東涌擴展區、新界東北及洪水橋，預計總承载人口為 461,000，但未來 10 年的移民數量預計達 50 萬。諮詢文件提出未來十年的總房屋供應目標為 47 萬個住宅單位，如以每座 800 個單位來推算（以和諧式每座 800 個單位計），最少要供應達 587 幢 40 層的住宅樓宇，所需土地面積之大實在難以想像。本會擔心這個目標將合理化各式的盲搶地。

多個現時政府建議的發展區計劃，都存在很多爭議及缺點，包括犧牲環境、農業、生態及村民家園、社會及環境代價巨大。

香港應以控制人口著手來舒緩房屋壓力，以減少各環境及社群的犧牲。若未能收緊單程證配額，港人的平均居住面積根本無法增加。香港應以控制人口著手來舒緩房屋壓力，以減少各環境及社群的犧牲。

若以諮詢文件中提及的情況，新界東北居民便要犧牲現有生活模式而家園被毀，東涌附近的中華白海豚也性命不保，縮減休憩及公共空間，市區的生活質素下降，各類污染源頭及設施過份貼近民居等等。

		政府的建議	預計人口	發展時需要犧牲
未來 10 年的單程證新移民 500,000 人	三個發展區的預計承载人口 461,000 人	東涌擴展區	110,000	需大面積填海，中華白海豚的及東涌河生態將犧牲，而搬進的居民需要承受飛機噪音
		新界東北發展區	176,000	農業、過萬人的居所、多間小工廠、生態、過萬棵樹
		洪水橋發展區	175,000	數千人的居所、貨棧業將大減規模



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傳真：3011 9577  
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電郵：info@greensense.org.hk  
網頁：www.greensense.org.hk

環保觸覺希望政府以控制人口增長為首要目標，以減低未來房屋需求，避免「盲搶地」，避免犧牲新界東北居民、中華白海豚及郊野公園，甚至是香港的未來。

我們認為取回單程證審批權，能讓香港政府進行適切的房屋、交通、教育及福利規劃。歸根究底，房屋問題應由「需求主導」改為「需求管理」，以免香港變成更高密度的石屎森林，失去休憩空間及綠化空間。

由政務司司長林鄭月娥領導的人口政策委員會，將公佈人口政策諮詢文件。我們認為有兩個議題，包括移民政策及香港的人口最高承载力，必需是諮詢的重要元素。若政府不包括這兩項大眾非常關心的議題，這份諮詢文件將評為不合格。

本會懇切希望長策會不要只談論未來建屋量，還要考慮開拓土地的撕裂社會問題及應考慮減少輸入人口。如有交流及回覆，可致電81004877 (余小姐)。

環保觸覺

二零一三年十月二十一日

致：房屋及運輸局 局長張炳良教授

就「長遠房屋策略」諮詢文件，「長者政策監察聯席」下稱「聯席」，有以下意見：

1. 有關諮詢文件的“問題6”：

就社會上建議撥地發展中高收入長者住屋計劃方面，你認為政府應否繼續支持？若然，應以何種形式支持？

「聯席」認為應繼續支持政府撥地發展長者住屋計劃，但只限於中收入長者。因為雖然我們要盡力幫助弱勢社群，但仍須顧及各階層人士對住屋的需要，尤其是中收入的長者，一般屬於中產階級，納稅的數額不少，而得到政府的支援卻不多，故應趁此機會爭取合理回報。其形式必要平衡不同長者階層對住屋的需要；

2. 政府應積極探討租金管制的可行性，以壓抑日益高漲的租金，從而減輕低下層市民的負擔；
3. 政府應實施“房屋空置稅”，以增加房屋的供應量；
4. 政府應積極邀請私營機構參與提供資助房屋單位；
5. 政府應加大力度增加土地供應，建造更多的公屋及居屋。

2013年10月22日



觀塘區劏房住戶回應  
《長遠房屋策略諮詢文件》  
意見調查報告



明愛牛頭角社區中心

觀塘長策劏房關注組

二零一三年十二月

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## 1 調查背景

本調查主要是收集觀塘區劏房住戶對於政府於 2013 年 9 月推出的《長遠房屋策略諮詢文件》(下稱長策)的意見。長策內容提到，居住於環境惡劣的市民，將會是政府在日後的房屋政策中，重點關注的一群。長策文件中提到會強力執法以杜絕非法和違反樓宇結構和防火安全的「劏房」，因而提出了考慮以發牌或登記制度規管「分間樓宇單位」，並諮詢公眾對於興建過渡性房屋予有需要人士的可行性，以及實施租務管制和租金津貼的意見。

自長策推出後，明愛牛頭角社區中心(下稱明愛中心)於本年十月中至十一月初以家訪形式，在觀塘區進行了《長遠房屋策略諮詢文件》問卷調查，收集了 201 戶居住在觀塘區的劏房街坊的意見。問卷內容主要詢問劏房住戶對長策內容的意見，以及他們的住屋情況。調查完結後，明愛中心工作人員與曾接觸的劏房住戶成立了「觀塘區長策劏房關注組」，一起分享住屋困境，以及具體討論希望改善住屋問題的訴求，並在長策諮詢期內(2013 年 9 月至 12 月 2 日)向政府反映意見。

## 2 調查原因

根據本年度貧窮線發佈的內容中提到，觀塘區乃全港 18 區中最貧窮的區域(香港政府，2013)。這顯示觀塘區集結低收入人士，於租住私人樓宇項目裏面，他們未能應付新建而又昂貴的私人住宅。因此，這批低收入人士未能獲派或申請公屋時，只能選擇較為便宜的舊樓劏房單位，以解決住屋需要。另一方面，觀塘區乃位於市區，一直聚居不少市民，自近年市區重建局於觀塘裕民坊一帶收購舊樓以來，原本住於該批舊樓的租戶被迫搬遷。基於工作、兒童學習、生活環境熟悉程度及交通等問題，大部分租戶都會選擇留在本區居住。這使未受重建影響的舊樓住居需求增加，導致更多劏房數目的出現，以及租金上升的情況。

觀塘區劏房住戶雖然在住屋方面面對很大的困難，但一直未有團體組織他們，讓他們表達自己的需求及意見。長策推出以來，觀塘區劏房住戶亦未有表達任何聲音和意見。

若要清楚了解觀塘區的劏房租戶的居住困難及需要，是有需要詳細探討他們在租住劏房時所遇到的難處，以及他們對於房屋政策的訴求。適逢長策重點提到劏房問題，我們於是進行這項調查，一方面了解劏房住戶的住屋需要，藉此引起大眾對劏房住戶的關注，另一方面，也搜集劏房住戶對長策文件內所提出的建議的回應意見，有助政府在制定長策時作參考之用。

### 3 調查目的

- 3.1 了解觀塘區劏房住戶對長策內容的意見;
- 3.2 探討觀塘區劏房住戶對過渡性房屋的意見;
- 3.3 探討觀塘區劏房住戶對租務管制、租金津貼及增加公屋供應量的意見;及
- 3.4 了解觀塘區劏房住戶的住屋及租住情況

## 4. 調查方法

### 4.1 調查設計

是次調查採用問卷調查方式(survey design)，並主要以「量化描述性」(quantitative descriptive design)的調查設計方法進行。是次調查是透過訪問員以家訪形式接觸訪問對象來搜集資料。

### 4.2 調查對象

本調查的對象為居住在觀塘市區舊區的劏房租戶，年齡為 16 或以上人士。

### 4.3 抽樣方法

本調查採用方便抽樣(convenient sampling)方法，受訪劏房住戶的地址主要來自於本年 4 月份在明愛牛頭角社區中心申請關愛基金提供的「惡劣居任生活津貼」和中華電力公司關顧社區津貼的住戶資料作參考，從這些資料列出有劏房住戶居住的街道、大廈及樓層。訪問員首先接觸提供給他們的住戶地址，但是，若發現附近有劏房住戶，他們也可以接觸他們進行訪問。

### 4.4 調查工具

是項調查採用「先設封閉式」(structured and closed-end)問卷為調查工具。我們在決定進行是次調查後，於二零一三年九月尾開始策劃設計問卷。首先參考了長策所關注劏房的政策規劃，就着長策所提出的政策的方向和諮詢公眾的問題初步擬定問卷內容。之後更接觸了明愛牛頭角社區中心的居民小組內的一些劏房街坊，個別了解他們的住居需要及訴求，及初步詢問們對長策的意見，這些面談內容對擬定問卷題目及重點有很大的幫助。在草擬了問卷初稿後，調查員於二零一三年十月十一日進行了二十四份問卷測試，對問卷內容作出進一步修改，然後定稿。問卷內容主要分為兩部分，第一部分主要詢問劏房住戶對於長策內容的意見，第二部分乃詢問劏房住戶的基本資料及住屋情況，以讓整個調查有更深入的了解及分析。

## 4.5 資料搜集過程及結果

本調查採用家訪形式搜集資料，訪問員向受訪者進行面對面的問卷訪問。我們採用家訪形式去訪問受訪者，因為受訪住戶或需要較詳盡的說明才能明白調查內容，家訪能讓訪問員向受訪者慢慢講解，才讓受訪者填寫問卷，以增加訪問的準繩度。訪問時間主要於晚上七時至十時進行，因劏房住戶大多需要工作至較晚才回家。訪問員主要來自香港城市大學的學生，總共有 76 名學生及其他人士參與，我們主要招募就讀社會工作課程或相關社會科學課程的學生成為訪問員，因為他們對於社會議題會有較多的認識。為了讓訪問員對訪卷內容有充分的認識，在每一次進行問卷調查前都會進行訪問員訓練，講解訪問時需注意的事項及問卷內容，並了解訪問的技巧及接觸劏房人士所需要留意的地方。

所有訪問在二零一三年十月十六日至十一月六日進行，為期三星期。我們結果成功訪問了 201 戶劏房住戶。

他們的居住地方來自觀塘市區舊區內 12 條街道及 37 幢大廈，當中以宜安街及康寧道較多劏房住戶，佔 20.5% (見表 1)。本調查所涵蓋的街道範圍都十分廣泛，主要以以往申請關愛基金及中華電力有限公司關顧社區津貼的劏房戶地址為藍本，鎖定較多劏房戶的大廈，以收集不同街道及大廈的住戶意見及住屋情況。

表 1: 居住街道

	人數	百分比
聯安街	9	4.5
恒安街	13	6.5
宜安街	16	20.5
通明街	20	10.0
康寧道	41	20.5
輔仁街	9	4.0
崇仁街	2	1.0
瑞寧街	10	5.0
雲漢街	29	14.5
嘉樂街	2	1.0
瑞和街	2	1.0
協和街	23	11.5
總數	201	100.0

## 4.6 調查分析方法

所有訪問資料被輸入電腦，分析方法採用社會科學統計分析電腦軟件 SPSS/PC 20.0 程式作數據分析。

## 4.7 調查局限

由於資料所限，這調查並不能獲取全觀塘區劏房住戶的聯絡方法，故不能採用機會率抽樣方式(probability sampling)。因此，此調查未能完全推斷整體觀塘區劏房住戶對長策的回應。雖然如此，此調查已嘗試在觀塘區不同範圍進行訪問，包括 12 條有劏房住戶居住的集中街道。

# 5 調查結果及分析

## 5.1 受訪者基本資料

### 5.1.1 性別

受訪者以女性較多，佔 56.7%，(見表 2)，主要是由於女性較多擔任照顧家庭的角色，家訪問卷時較易接觸，男性由於多出外工作而較晚才回家。

表 2: 性別

	人數	百分比
男	87	43.3
女	114	56.7
總數	201	100.0



### 5.1.2 年齡

有四成多受訪者 (43.8%)的年齡是介乎 36 至 50 歲(見表 3)，有三成多(35.3%)的年齡介乎 21 至 35 歲，這顯示大部份受訪者為青年至中年人士。

表 3: 年齡

	人數	百分比
16-20	13	6.5
21-35	71	35.3
36-50	88	43.8
51-64	19	9.5
65 或以上	5	2.5
沒有作答	5	2.5
總數	201	100.0

### 5.1.3 居住面積

長遠房屋策略督導委員會委託政策二十一有限公司於 2013 年 1 月至 4 月期間調查香港劏房的情況(下稱政策二十一調查)。根據政策二十一調查結果，過半受訪者單位面積只有 70-139 平方呎(政策二十一有限公司，2013)。我們的調查結果跟政策二十一的調查結果一致，超過五成(53.3%)的觀塘劏房住戶的居住面積只有 60-139 平方呎。約兩成(18.9%)居住面積少於 100 平方呎，最少的面積僅為 60 平方呎，34.9%的劏房住戶居住面積為 100 至少於 150 平方呎(見表 4)。觀塘區劏房住戶的平均居住面積為 127 平方呎，中位數為 100 平方呎。

表 4: 居住面積

	人數	百分比
60 - <100 平方呎	38	18.9
100 - <140 平方呎	69	34.4
140 - <200 平方呎	20	10.0
200 或以上平方呎	31	15.3
沒有作答	43	21.4
總數	201	100.0

平均數 = 127 平方呎      中位數 = 100 平方呎

### 5.1.4 居住人數

接近一半的受訪者為三至四人家庭，佔 48.3%(見表 5)，獨居五人或以上的家庭也佔三成(30.4%)。平均人數為 3 人。

表 5: 居住人數

	人數	百分比
1 人	25	8.5
2 人	39	12.4
3-4 人	99	48.3
5 人以上	21	30.4
沒有作答	17	.4
總數	201	100.0

平均數 = 3 人      中位數 = 3 人

### 5.1.5 平均每人居住面積

在 201 位受訪者當中，有 155 人提供了居住面積及居住人數，搜集了他們的居住面積及居住人數後，本調查嘗試統計出受訪者的平均每人居住面積(居住面積/居住人數)(見表 6)。受訪者的平均每人居住面積為 51.3 平方呎，與政策二十一調查結果的 67.6 平方呎數目更小。受訪者中，平均每人居住面積有 50 平方呎以下的佔 73%，最少的每人平均居住面積僅為 16.67 平方呎。

表 6: 受訪者平均每人居住面積

	人數	百分比
50 平方呎或以下	113	73
51-100 平方呎	33	21.5
101 平方呎或以上	8	5.5
總數	155	100.0

平均數 = 51.3 平方呎      中位數 = 40 平方呎      最少數 = 16.67 平方呎

### 5.1.6 居住劏房時間

受訪者平均居住劏房年份為2.8年，最高居住年份達9年之久。如表7所示，大部分受訪者居住年份介乎一至五年，有65%。

表 7: 居住劏房時間

	人數	百分比
<1 年	22	11.0
1-2 年半	72	36.0
2 年半至 5 年	58	29.0
5 年或以上	18	9.0
沒有作答	31	15.0
總數	201	100.0

平均數 = 2.8 年    中位數 = 2 年    最大數 = 9 年

### 5.1.7 現時每月租金

受訪者所住的劏房，現時平均每月租金為\$3,390，最高的租金達\$8,000。每月租金最多的組別介乎\$3,001 至\$4,000，佔 36%(見表 8)。介乎\$2,001 至\$3,000 及 \$4,001 至\$5,000 分別為 23%及 18.5%。租金達\$5,000 或以上的共 9%，可見劏房住戶所承受的租金負擔非常沉重。

表 8: 現時每月租金

	人數	百分比
\$1,000-\$2,000	7	3.5
\$2,001-\$3,000	46	23.0
\$3,001-\$4,000	73	36.0
\$4,001-\$5,000	37	18.5
>\$5,000	18	9
沒有作答	20	10.0
總數	201	100.0

平均數 = \$3,390    中位數 = \$3,500    最大數 = \$8,000

### 5.1.8 近一年有否加租

受訪者中近四成半(44.8%)於近這一年有出現加租情況(見表 9)，可見加租於劏房住戶居住情況中十分普遍。

表 9: 近一年有否加租

	人數	百分比
有	90	44.8
否	51	25.4
沒有作答	60	29.8
總數	201	100.0

### 5.1.9 加租金額

受訪者在過去一年平均加租金額為\$542，與政策二十一的調查結果一致。最多住戶的加租金額介乎\$500 至\$1,000 以下之間，佔 35.7%(見表 10)，加租\$1,000 或以上的亦佔 15.5%，最高加租金額達\$2,000，可見承受加租負擔的住戶佔相當的比例。

表 10: 加租金額

	人數	百分比
\$100 - <\$300	14	15.5
\$300 - <\$500	30	33.3
\$500 - <1,000	32	35.7
>\$1,000	14	15.5
總數	90	100.0

平均數 = \$542    中位數 = \$500    最大數 = \$2,000

### 5.1.10 每月家庭總收入

撇除沒有作答的受訪者，受訪者平均每月家庭總收入為\$8,676，中位數為\$10,000，相對全港入息中位數的\$12,300為低（政府統計處，2013）。每月家庭總收入介乎\$8,001至\$10,000的佔最多數，有26.9%（見表11），\$8,000或以下的亦佔15%。

表 11: 每月家庭總收入

	人數	百分比
\$4,500-\$8,000	30	15.0
\$8,001-\$10,000	54	26.9
\$10,001-\$15,000	43	21.1
\$15,001-\$20,000	17	8.5
\$20,001 或以上	6	3.0
沒有作答	51	25.4
總數	201	100.0

平均數 = \$8,676      中位數 = \$10,000

### 5.1.11 每月租金佔家庭總收入情況

受訪者每月租住劏房的租金佔其每月家庭總收入的平均百份比為34.9%，較政策二十一的調查結果(29.2%)為高，並與全港關注劏房平台的調查結果(35.9%)相若(全港關注劏房平台，2012)。此外，租金佔家庭總收入的中位數為33%。所佔百分比最多介乎21至40%，佔60.3%（見表12）。61%或以上的亦有4.1%，這反映劏房住戶負擔非常沈重的租金。

表 12: 每月租金佔家庭總收入情況

	人數	百份比
0 - 20%	17	11.7
21-40%	88	60.3
41-60%	35	23.9
61%或以上	6	4.1
總數	146	100.0

平均數 = 34.9%      中位數 = 33%      最大數 = 75%

## 5.2 對《長遠房屋策略諮詢文件》的意見

### 5.2.1 對政府建議以發牌或業主登記制度去規管劏房的意見

長策文件中首要提議以發牌或業主登記制度以規管住宅樓宇和綜合用途樓宇內的分間樓宇單位，並詢問市民對這制度的意見。

超過五成(56.7%)受訪者，認為發牌或業主登記制度去規管劏房，不可以解決劏房問題(見表 13)。只有約三成(33.8%)認為有幫助。

表 13: 受訪者認為政府建議以發牌或業主登記制度去規管劏房，是否可以解決劏房問題?

	人數	百分比
可以	68	33.8
不可以	114	56.7
無意見	19	9.5
總人數	201	100.0

接近九成(89.1%)的受訪者擔心發牌制度實施後，劏房租金會上升(見表 14)，這反映發牌制度令劏房住戶在精神上飽受壓力，擔心承擔更高昂的租金。

表 14: 受訪者會否擔心發牌制度實施後，劏房租金會上升?

	人數	百分比
擔心	179	89.1
不擔心	16	8.0
無意見	6	3.0
總數	201	100.0

更有近七成半的受訪者(74.1%)表示擔心發牌制度實施後，劏房住戶會被業主迫遷(見表 15)。

表 15: 受訪者會否擔心發牌制度實施後，劏房住戶會被業主迫遷?

	人數	百分比
擔心	149	74.1
不擔心	31	15.4
無意見	21	10.4
總數	201	100.0

## 5.2.2 對提供過渡性房屋的不同可行性的看法

長策文件亦諮詢公眾，對於於市區合適的臨時空置土地，用來興建過渡性房屋予有需要人士的可行性。

問卷就着以下五種提供過渡性房屋的可行性方法，詢問受訪者的意見，包括(一)對使用臨時空置土地、(二)提供社區房屋、(三)改建政府物業、(四)於重建公屋計劃中，空置數座樓宇不拆和(五)改建工廈作為過渡性房屋。整體而言，受訪者十分贊成採用興建過渡性房屋的建議，有超過七成的受訪者對不同的方法都表示同意。

調查指出，最多受訪者認為使用臨時空置土地去興建過渡性房屋，以及提供社區房屋，為最可行的方法，均超過八成半(86.1%)(見表 16)。另外，有八成受訪者(83.6%)認為改建政府物業去興建過渡性房屋亦是可行的方法。至於在重建公屋計劃中，空置數座樓宇不拆及改建工廈，去安置劏房住戶，也分別佔 78.6%及 70.6%。

表 16: 受訪者對提供過渡性房屋的不同可行性的看法?

	可以		不可以		無意見	
	人數	百分比	人數	百分比	人數	百分比
使用臨時空置土地， 興建過渡性房屋	173	86.1	22	10.9	6	3
提供社區房屋	173	86.1	13	6.5	15	7.5
改建政府物業	168	83.6	15	7.5	18	9.0
於重建公屋計劃中，空 置數座樓宇不拆，作過 渡性房屋	158	78.6	23	11.4	20	10.0
改建工廈	142	70.6	31	15.4	28	13.9

總人數 = 201 人

### 5.2.3 對政府實施租務管制和租金津貼的意見

超過八成半受訪(86.6%)同意政府要實施租住權管制(見表 17)，以保障租客享有續租權。現時租客在續租時都處於被動的一方，任由業主擺佈，享有續租權能保障租客議價能力。

表 17: 受訪者是否同意政府要實施租住權管制，以保障租客享有續租權?

	人數	百分比
同意	174	86.6
不同意	14	7.0
無意見	13	6.5
總數	201	100.0

接近九成(89.6%)的受訪者也同意政府要實施租金管制(見表 18)，監管租金水平，消除現時租金越來越高的情況。

表 18: 受訪者是否同意政府要實施租金管制?

	人數	百分比
同意	180	89.6
不同意	10	5.0
無意見	11	5.5
總數	201	100.0

絕大部分的受訪者(94%)也同意政府應提供租金援助或津貼給在公屋輪候冊上等候超三年、而仍未獲編配單位的劏房租戶(見表 19)。而這亦是眾多建議當中，最多受訪者同意的福利政策。

表 19: 受訪者是否同意政府為在公屋輪候冊上等候超過三年，而仍未獲編配單位的劏房租戶，提供租金援助或津貼?

	人數	百分比
同意	189	94.0
不同意	9	4.5
無意見	3	1.5
總數	201	100.0



#### 5.2.4 對公屋建屋量的意見

長策指出，政府推算未來十年總房屋供應以中位數的 470,000 個單位作為供應目標，當中建議公私營房屋供應比例為 60:40。由此計出，每年平均興建約 28,200 個公營房屋單位（當中包括公屋及居屋）。現時公屋輪候冊上有 23 萬申請人，根據政策二十一的調查結果指出，估算全港有 66,900 間劏房，住了約 171,300 名居民。劏房居民大多為公屋申請人。

超過五成(56.2%)的受訪者認為政府計劃在未來十年內，每年平均興建約 28,200 個公營房屋單位（當中包括公屋及居屋），不能夠解決劏房問題（見表 20）。只有約二成(22.4%)表示能夠解決劏房問題。

表 20: 受訪者認為政府計劃在未來十年內，每年平均興建約 28,200 個公營房屋單位（當中包括公屋及居屋），是否能夠解決劏房問題？

	人數	百分比
能夠	45	22.4
不能夠	113	56.2
無意見	43	21.4
總數	201	100.0

調查亦發現，超過九成(92.5%)的受訪者同意市區重建局在重建舊區私人樓宇的項目內，興建公屋，以增加公屋供應量（見表 21）。可見受訪者對於公屋量的需求很大。現時觀塘區舊樓正在重建，然而，重建後的土地全部只用作興建私人樓宇，沒有興建公屋。

表 21: 受訪者是否同意市區重建局在重建舊區私人樓宇的項目內，興建公屋，以增加公屋供應量

	人數	百分比
同意	186	92.5
不同意	4	2.0
無意見	11	5.5
總數	201	100.0

## 6. 整體分析及討論

### 6.1 劏房住戶平均每人居住面積不足

是次調查發現觀塘區劏房住戶的平均居住面積為 127 平方呎，每人的平均居住面積佔最多數的是 50 平方呎或以下(73%)，中位數僅 40 平方呎。對於有小朋友的家庭來說，每人的活動空間十分狹窄，小朋友根本沒有足夠的空間活動。有住戶反映每天都要先跟小朋友於區內圖書館或福利機構做好功課才能回家，可見居住環境的狹窄。不少住戶需二至三人共睡一張單人床，絕大部分都是於劏房狹小的環境內晾乾衣服。更甚的是煮食爐具與廁所設於同一位置，衛生情況非常惡劣。劏房環境擠迫，更沒有多餘的空間擺放儲物櫃及傢俬，因此住戶的衣物及雜物大多隨處放於屋內，令居住環境非常雜亂。

### 6.2 租金佔家庭總入息的高比例帶來沉重的經濟負擔

是次調查發現觀塘區劏房租金的格價非常昂貴，租金中位數為\$3,500，若與居住面積的中位數 100 平方呎作計算，每平方呎要\$35。根據中原地產新簽租約統計，2013 年 3 月全港 85 個大型私人住宅屋苑的平均租金每方呎為 22.9 元，劏房無論在居住環境及設施上，遠差於大型私人住宅，但租金則比大型私人住宅為高。加上絕大部分的劏房住戶都是低收入人士，試問如何負擔如此高昂的租金。是次調查主要在晚上進行的主要原因乃劏房住戶大多需長時間工作，要到晚上才放工回家休息。他們長時間工作，辛苦賺回來的金錢，卻要用大部分來支付昂貴薪金，部分受訪者表示生活非常艱苦。

除了租金昂貴外，觀塘劏房住戶加租的情況亦很嚴重。接近四成半(44.8%)住戶這年度正面對加租情況。這一年加租平均數達\$542，即每年租戶要多給\$6,504 (\$542 X 12 個月)的租金。更甚是加租\$1,000 或以上的住戶佔調查的 15.5%，亦佔相當比例，加幅非常大。這反映租戶在現時的租務市場中完全沒有議價的能力，租金任由業主制定，加租幅度亦沒有規限，在現時劏房需求大的情況下，若租戶拒絕交租，很快便會被業主迫遷，任由業主魚肉。

是次調查收集了劏房住戶的租金及家庭總收入後，訪問員嘗試得出了租金佔每戶家庭總入息的比例。結果得出平均數為 34.9%，比起政策二十一調查結果所得出的 29.2%還要高，可見租金為租戶的生活帶來沉重的負擔。住戶辛苦賺來的收入，大部分已要用在租金支出上，還未包括水費及電費，有小孩的還要支付學費，扣除這些基本支出，只餘下很少的金錢作生活費。從調查得知，住戶平均收入為\$8,676，若租金佔 34.9%，住戶只剩餘\$3,027 作其他費用。扣除基本支出，相信用於購買生活必需品的金額將會變得少之又少。若家庭中有小孩，根本沒有充足的金錢購買較好的食物及衣物給他們。由此可見，劏房住戶現時所承受的昂貴租金實在為他們帶來沉重的負擔。

### 6.3 劏房住戶反對發牌或業主登記制度

是次調查結果指出，超過五成的(56.7%)的劏房住戶認為發牌或業主登記制度不可以解決劏房問題。很多受訪者也表示發牌制度雖然有機會改善劏房環境的安全性，但制度所帶來的問題比起它所帶來的好處更令他們擔心。

接近九成(89.1%)的劏房住戶也表示擔心發牌會令租金上升。業主需要額外支付金錢來改善樓宇結構及防火安全，所動用的金錢很大機會會向租客索回，導致租客要負擔更昂貴的租金，令他們百上加斤。發牌制度推出後，「劏房」業主或需要動用資金改善現時的住屋環境，他們所支付的金錢勢必向租戶討回，導致租金再度上漲，基層家庭根本無力支付。甚或有些業主因為免麻煩要去裝修住屋，而情願趕走租戶，導致租戶無家可歸。

不少受訪者指出，在 1998 年取消了租金管制及於 2004 年取消了租務管制後，租戶在租務市場已沒有了議價能力，租金上升的幅度任由業主擺佈，租約一年生約一年死約，有些甚至沒有租約，加上有些租戶被迫遷時的通知期僅一個月，租戶必須在一個月內在本區找到合適單位、買傢俬及搬遷，租住情況非常痛苦。除此之外，74.1%的租戶表示也擔心發牌會令劏房住戶被業主迫遷。業主或會避免麻煩去改善單位的結構及安全性，而趕走租戶，不再續約。

### 6.4 劏房住戶支持租金管制及租住權保障

就調查所得，鑑於現時劏房住戶在租務市場裏面完全沒有議價能力，及租金急速上升，因此，接近九成(89.6%)的住戶支持實施租金管制。發牌制度很大機會會令劏房租金再度上升，因此被訪者強調若果真要發牌，必須同時實施租金管制。確保到劏房環境的安住性之餘，亦能保障租戶在租住上的租金水平。

另外，86.6%的住戶贊成實施租住權保障，讓舊租客在續租約的時候，有一定的保障，以防止業主借機大幅加租，企圖以高租金迫使租客同意，若租客不同意便隨意趕走他們。租住權保障亦能延長被迫遷的通知期，讓租客有較長的時間找另一個單位。因找新單位需考慮到價錢、環境、工作地區、上課地區等因素，現時不少劏房住戶只得一個月的通知期便要搬走，實在非常短暫。總括而言，劏房住戶十分贊成重新實施租務管制，維護租客在租務市場的權益。

## 6.5 劏房住戶認為政府應該發放租金援助/津貼

為協助劏房住戶面對昂貴的租金負擔，絕大部分的受訪劏房住戶(94%)均同意政府發放租金援助/津貼給他們。政府常提到公屋輪候時間為期三年，然而，近年亦知道這承諾不能兌現。因此，為讓政府補償所兌現的承諾，劏房住戶提出政府應發放租金援助/津貼給在公屋輪候冊上等候超過三年，而仍未獲編配單位的住戶。現時劏房租金常昂貴，發放租金津貼能大大減輕住戶的生活負擔。

## 6.6 劏房住戶認為「過渡性房屋」可幫助有需要的人士

是次調查引證了劏房住戶支持提供「過渡性房屋」的建議。最多受訪者認為使用臨時空置土地去興建「過渡性房屋」，他們表示政府應有效運用臨時沒有規劃用途的土地，興建結構簡單的「過渡性房屋」給他們，讓他們上輪候到公屋之前有比劏房較佳的住所。受訪者亦很支持有社區房屋的出現，讓一些非政府機構營辦及運作，以低廉租金租予劏房人士。

此外，改建政府物業，如空置校舍及紀律部隊校舍亦是劏房認為可行的方法。一般校舍都有充足的通風系統，而且間格簡單，改建用作「過渡性房屋」時所改裝的工夫較少。劏房住戶亦支持於重建公屋計劃中，空置數座樓宇不拆，作為過渡性房屋。改建工廠大廈雖備受各界爭議其可行性，但是次調查所得，觀塘劏房住戶普遍亦認為這是一個可行的方法去提供過渡性房屋。

整體而言，住戶認為他們現時的情況非常惡劣，他們很想早日擺脫困難的住屋生活，因此，任何可行的方法去提供「過渡性房屋」給他們，他們普遍都認為較住劏房為佳。

## 6.7 長策提出的建屋量未能解決劏房問題

對於政府於長策所提到的十年 470,000 建屋量，當中六成為公營房屋單位(包括公屋及居屋)，即每年平均興建約 28,200 個公營房屋單位，超過五成(56.2%)的住戶亦表示這數目不足夠去解決劏房問題。現時居住於劏房的住戶，超過一半也在輪候公屋，現時公屋輪候冊有 230,000 個申請，計劃所定的建屋量實在不能應付現時龐大的住屋需要。

為增加公屋供應量，超過九成(92.5%)的住戶也同意市區重建局在重建舊區私人樓宇的項目內，興建公屋，以增加公屋供應量。現時觀塘區重建中，並沒有規劃興建公屋，全用作起私人樓宇，這令很多劏房住戶也為之憤怒。原本一心打算慢慢等候重建興建公屋，能夠原區入住公屋單位，怎料這希望完全成為泡影。

## 7. 建議

### 7.1 提供長期租金津貼/援助給輪候公屋超過三年的劏房住戶

我們認為政府應兌現三年上樓的承諾，對於輪候公屋超過3年而未能上樓的申請人提供租金津貼。津貼金額建議相等於公屋每月租金與私人市場每月租金的差額，以劃一水平發放，而不是與個別租戶的租金或收入情況掛勾。我們建議政府每年發放四次，每季發放一次。

現時關愛基金推出的「為居住環境惡劣的低收入人士提供津貼」只屬一次過發放形式。我們認為一次性的援助未能確切減輕劏房住戶的負擔，因此建議有較緊密的發放次數。政府常稱發放租金津貼會令租金上升，因業主得知租客有津貼援助後，會提高租金。因此，我們建議提供租金津貼的同時，亦實施租金管制，讓津貼能真正受惠到劏房租戶，防止無理業主突然大幅加租。

### 7.2 提供「過渡性房屋」給劏房住戶

現時劏房租戶因政府按建築物條例執法而被迫搬出。租戶在面對清拆和迫遷時，因經濟能力有限，大多難以尋覓隱妥居所，最後只能搬往另一個劏房居住。加上發牌或業主登記制度很可能令劏房住戶面對被迫遷的情況，我們建議提供「過渡性房屋」給劏房住戶。

我們建議政府於臨時的空置土地興建過渡性房屋。另外，亦希望政府在空置的工廠大廈、空置校舍單位、紀律部隊宿舍及各重政府建築物設立「過渡性房屋」，以讓劏房住戶在較佳的環境居住。

我們亦建議政府能有效利用市區重建局那些因分階段執行計劃而未能於短時間內拆卸的房屋作「過渡性房屋」。現如觀塘重建收樓亦收了將近十二年，若當初能將部分不會在短時間內拆卸的房屋作「過渡性房屋」之用，定必為部分劏房住戶帶來較為舒緩的住居環境。

除此之外，我們亦建議政府考慮為基層家庭制訂社區房屋。社區房屋由非政府機構營辦，以宿舍形式運作，以低廉租金租予低收入人士，以保障他們的住屋需要。本港有非政府機構正在營辦，如房協等。若將社區房屋的數量增加，實能減輕不少劏房住戶的負擔。

### 7.3 重施租務管制

從這次調查中所發現到的問題，更加明確顯示劏房租客在現時的租務市場中成為被欺壓和無議價能力的一群。於是業主所訂的租金越訂越高。交不到租金的租戶更隨時於一個月內接獲通知書，被迫搬遷。加上現時的租約大多是一年死約一年生約，到了生約期，租客可謂完全沒有保障，業主隨時加租。

有鑑於此，我們提倡政府重施租務管制，包括租金管制及租住權保障。租金管制能有效規管現時租金水平，防止現時不斷上漲的租金越加上升，規管業主與租戶訂立租金時的限度，讓租客有較高的議價能力。另外，租住權保障能保障舊租客的續租權，防止業主於續租時大幅提高租金。這能保障租客不必承受高昂的加租幅度，以及不必在未支付高租金的時候被迫遷，導致不停要找新屋的局面。租住權保障仍能確保有合理的中止租約通知期限，給予租客足夠時間尋找新居。

### 7.4 增加公屋供應量

我們認為以現時 230,000 的公屋輪候人數，還要估算日後增加的申請人數不斷增加，政府預定的每年 28,200 個公營房屋單位的供應量一定不足夠。因此，我們建議政府應增加公屋的供應量，平均每年須建屋 3 萬多公屋。劏房住戶大多正輪候公屋，輪候年期平均有三年以上，有些更等至五至七年不等。面對如此惡劣的環境，卻苦等公屋不成。因此，我們希望政府多找土地興建公屋。並提議市區重建局在重建舊區私人樓宇的項目內，興建公屋，以增加公屋供應量。

### 7.5 反對在沒有配套下推行發牌或業主登記制度

發牌或業主登記制度可能有其可取之處，因能規管分間樓宇單位的結構及防火安全。但正如受訪者的意見顯示，超過一半(56.7%)認為發牌制度不能解決劏房問題，甚至令擔心會導致租金上升及被業主迫遷的情況。因此，我們認為在沒有相應配套政策下，不應草率推行發牌或業主登記制度。

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## 9. 附錄: 調查問卷



明愛牛頭角社區中心

問卷編號:

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## 「長遠房屋策略諮詢文件」問卷調查

開場白: 「你好,我是明愛牛頭角社區中心的義工,近日政府發表咗一份長遠房屋策略諮詢文件,裏面提到一些建議去解決劏房問題。今晚我地希望黎聽下你地對這些建議的個人意見,幫助劏房街坊一起去發聲,表達大家的訴求。你所提供的資料只是為了讓中心能聯絡他們參加日後的中心活動,並不會用作其他用途。」

1. 你認為政府建議以發牌或業主登記制度去規管劏房,是否可以解決劏房問題?  
 1  可以                      2  不可以                      3  無意見
  
2. 你會否擔心發牌制度實施後,劏房租金會上升?  
 1  擔心                              2  不擔心                              3  無意見
  
3. 你會否擔心發牌制度實施後,劏房住戶會被業主迫遷?  
 1  擔心                              2  不擔心                              3  無意見
  
4. 你是否同意政府使用臨時空置土地,來興建過渡性房屋予劏房人士?  
 1  同意                              2  不同意                              3  無意見
  
5. 你認為以下哪些建議是可行的方法,去提供過渡性房屋予劏房人士?  
 (逐題問)
- 5.1 改建工廈                      1  可以                      2  不可以                      3  無意見
- 5.2 改建政府物業 (如空置校舍、紀律部隊宿舍等)  
 1  可以                              2  不可以                              3  無意見
- 5.3 於重建公屋計劃中,空置數座樓宇不拆,作為過渡性房屋  
 1  可以                              2  不可以                              3  無意見
- 5.4 提供社區房屋(如請非政府機構營辦宿舍,以低廉租金租予劏房人士)  
 1  可以                              2  不可以                              3  無意見
- 5.5 其他: \_\_\_\_\_
  
6. 你是否同意政府要實施租住權管制,以保障租客享有續租權?  
 1  同意                              2  不同意                              3  無意見
  
7. 你是否同意政府要實施租金管制?  
 1  同意                              2  不同意                              3  無意見

請翻頁



8. 你是否同意政府為在公屋輪候冊上等候超過三年，而仍未獲編配單位的劏房租戶，提供租金援助或津貼？
- 1  同意                      2  不同意                      3  無意見
9. 你認為政府計劃在未來十年內，每年平均興建約 28,200 個公營房屋單位（當中包括公屋及居屋），是否能夠解決劏房問題？
- 1  能夠                      2  不能夠                      3  無意見
10. 你是否同意市區重建局在重建舊區私人樓宇的項目內，興建公屋，以增加公屋供應量？
- 1  同意                      2  不同意                      3  無意見
11. 我們計劃成立「觀塘劏房租戶關注組」，為劏房租戶發聲和爭取權益，你願意參加嗎？  
(關注組開會時間通常是逢星期五晚 7:30pm-9:00pm)
- 1  願意                      2  不願意                      3  無意見
12. 若於以上時間未能出席，但又想參加，請問你每星期理想的日期及時間是？  
逢星期\_\_\_\_\_ 時間:\_\_\_\_\_
13. 基本資料      姓名:\_\_\_\_\_ 性別: 1  男 2  女  
年齡: 1  16-20 歲 2  21-35 歲 3  36-50 歲  
                    4  51-64 歲 5  65 歲或以上  
聯絡電話:\_\_\_\_\_
- 居住街道:\_\_\_\_\_ 大廈名稱:\_\_\_\_\_ 樓\_\_\_\_\_ 號  
居住面積:\_\_\_\_\_ 平方呎  
居住人數:\_\_\_\_\_
- 居住現居劏房年份:\_\_\_\_\_ 年\_\_\_\_\_ 月  
現時每月的租金是多少? \_\_\_\_\_ 元  
近這一年有否加租? \_\_\_\_\_ 加了多少? \_\_\_\_\_ 元  
平均每月家庭總收入: \_\_\_\_\_ 元

-訪問完畢，多

訪問員填寫:

街坊回應的積極程度 (0 為最低分，10 為最高分): \_\_\_\_\_

訪問日期: \_\_\_\_\_ 訪問員姓名: \_\_\_\_\_

觀塘區長策劃房  
關注組致送

張炳良局長及胡韻珊姐

《觀塘劃房實錄》



← 這已拍下  
全個劏房  
單位，一目了然！

「廚廁一室」





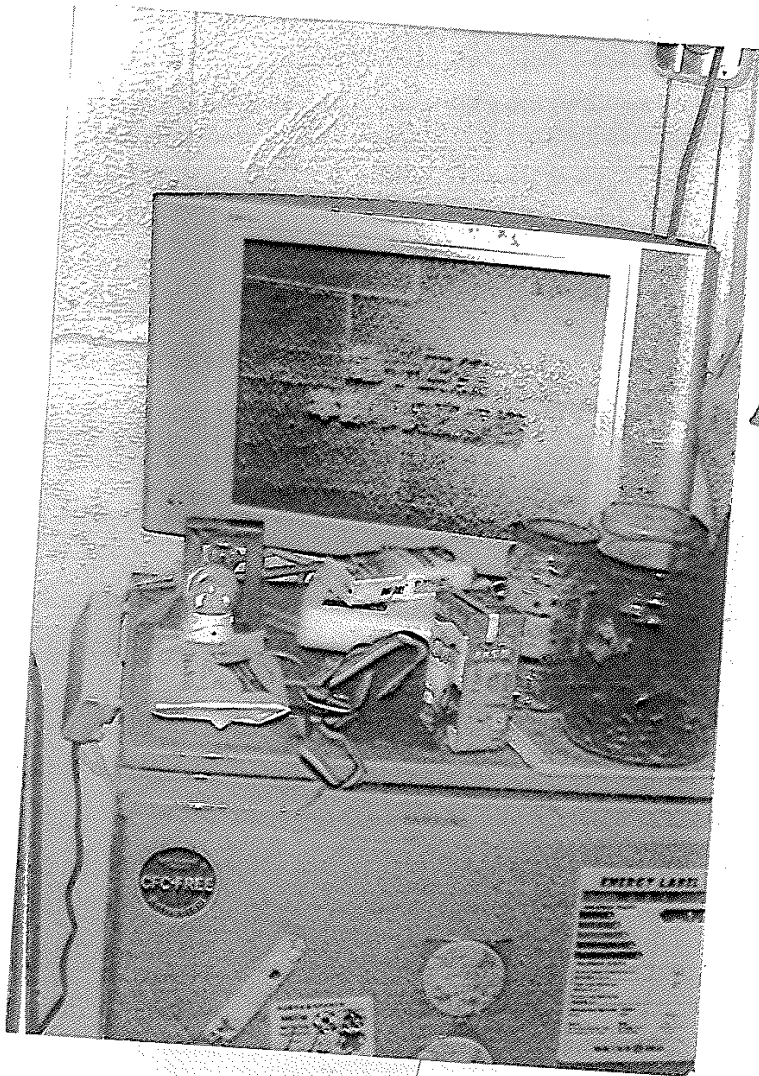


衣服晾在走廊，

樓梯

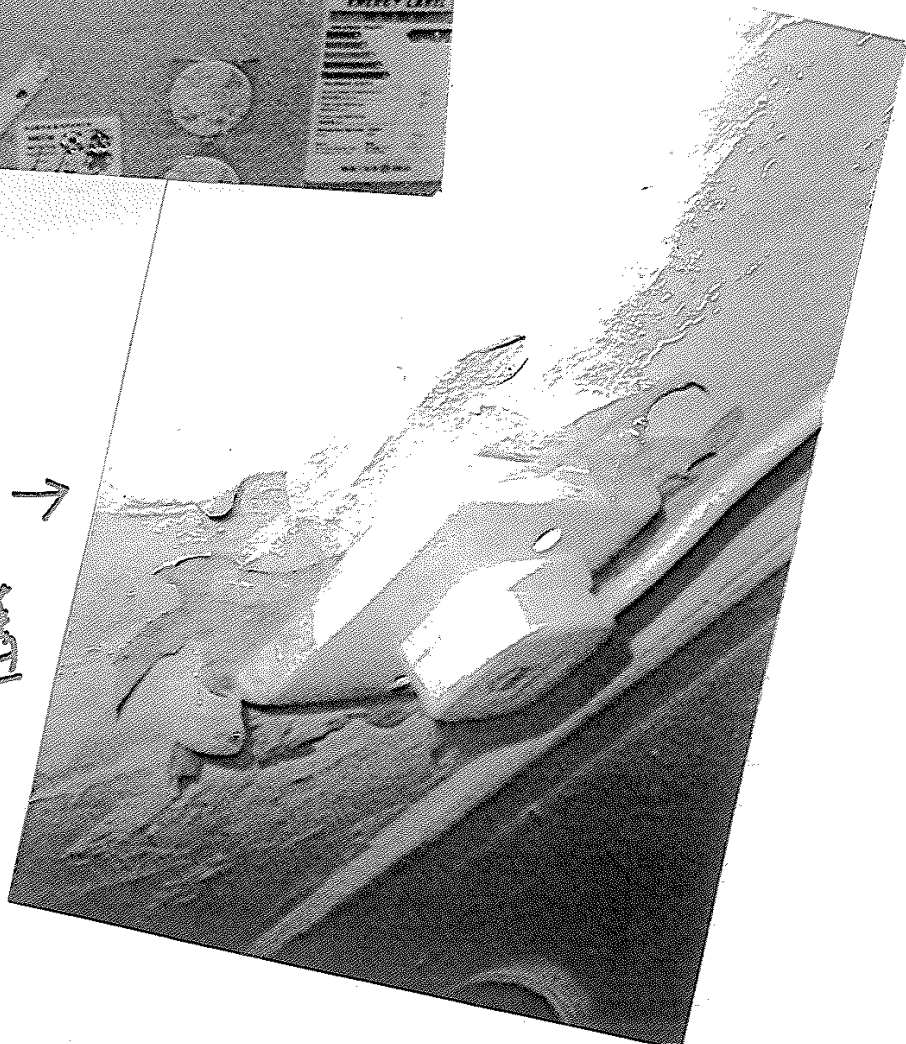
以及

屋內，原本已小的家，  
堆放大量晾晒衣服



← 電源不足，  
常接收磁，  
看黑白雪花  
電視

牆壁，  
電氣  
非常殘舊 →





公用煮食爐

家裏只有一個電磁爐  
↓  
煮食





← 共用廁所



