



THE HONG KONG INSTITUTE OF  
**SURVEYORS**

香港測量師學會

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& 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.

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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.



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,

Sr Stephen Lai  
President  
The Hong Kong Institute of Surveyors

Cc : Sr Tony Tse, Legislative Councillor (Fax no.: 2880 5128)