

Habitat for Humanity Hong Kong Response to the CE 2020 Policy Address

Habitat for Humanity Hong Kong welcomes the positive steps the HKSAR Government is taking to increase the housing supply and to make housing more affordable and accessible across the housing ladder, and especially for people in low-income communities. We note the continued prioritization of housing as a key issue and the recognition that ‘meeting Hong Kong people’s housing needs is a goal too important to forsake.’¹ We acknowledge the multilayered complexities of the housing situation in Hong Kong. We advocate for a rights-based housing strategy and policies to ensure each and every person in Hong Kong has a decent place to live.

The Habitat Hong Kong submission for the Public Policy Consultation drew on the sector expertise represented on our Board of Directors and Public Policy & Programme Committee as well as our dedicated staff to the areas of public policy and research. We are grateful to have had the opportunity to meet with the HKSAR Government appointed Task Force for Study on Tenancy Control of Subdivided Units (SDUs). We were able to share rental housing case studies from overseas for consideration in addressing tenancy control issues for residents living in subdivided units in Hong Kong.

In our response to the November 2020 Public Policy Address, we would like to reference the following topics where we believe our proposals have been considered and/or where we would recommend further action be taken:

- 1. Increase in Public Rental Housing Units**
- 2. Transitional Housing**
- 3. Substandard Housing Conditions in Subdivided Units**

1. Increase in Public Rental Housing Units

- Whilst we are encouraged that 330 hectares of land required for providing 316 000 public housing units to meet the demand for about 301 000 public housing units, has been identified², we strongly recommend that in the development of these units, the HKSAR Government adopts a holistic approach to urban planning so that redevelopment projects provide future residents access to employment opportunities, public transportation, hospitals, schools, and other social facilities.
- Much land supply for future public rental housing estates is planned to come from Tung Chung, Kwu Tung North/Fanling North, and Hung Shui Kiu/Ha Tsuen. These areas are all located in the New Territories, over an hour away by public transportation from urban centres on Hong Kong Island and Kowloon. With many PRH applicants restricted from applying for PRH in urban areas and a majority of new PRH units planned for the NTs, there is a risk of increasing segregation of communities along socio-economic lines, which increases the inequity gap and social polarization. We ask the HKSAR Government to increase diverse and equitable housing options to address urban exclusion.
- We recommend that in all public housing development projects, the specific needs of vulnerable populations are considered and a universal access lens is applied to all future designs and developments.
- We recommend that in all public housing development projects, opportunities for public consultation on creative and innovative community solutions be considered and that the views of the local residents be considered in the design of the buildings and the use of the

¹ Paragraph 84 <https://www.policyaddress.gov.hk/2020/eng/p83.html>

² Paragraph 85 <https://www.policyaddress.gov.hk/2020/eng/p85.html>

5% of the gross floor area that will be set aside for the provision of social welfare facilities.³ We also recommend that overseas examples be considered in the innovative design of new builds.⁴

2. Transitional Housing

- We appreciate that the current-term Government is committed to promoting the development of transitional housing. Committing 15,000 transitional housing units within three years for families waiting for public rental housing (PRH) and residents in poor living conditions who have yet to get on the first rung of the housing ladder, is a positive step. But we believe this number is too small and does not go far enough to provide adequate housing for the scale of vulnerable members of our community. According to the Hong Kong Housing Authority, as of September 2020 there were 156,400 general applications for public rental housing, with around 103,600 non-elderly one-person applications.
- We absolutely recognize the need for an increase in supply and the urgency around speed of delivery, and urge the Government to take bolder actions to advance and streamline the building and approval processes and provide any necessary support to ensure nonprofit organizations seeking to implement the large scale of transitional housing projects are best positioned to do so.
- For long-term transitional housing projects, we support smart, sustainable and scalable design that adheres to adequate minimum standards. We welcome investment into better design that need not translate into higher rental costs. Consideration should be given to JCDISI's Transitional Social Housing Action Project Report which highlights the ten guiding principles on the planning and design of transitional social housing projects to create value for money, which at the same time, provide a decent living environment for the inadequately housed.⁵
- Discussions with NGOs taking part in the Community Housing Movement highlighted that the funding does not cover provision of appropriate amenity facilities. Provision of amenities facilities and open space is of paramount importance to enhancing the health and wellbeing of the inadequately housed and instill a sense of belonging in the community, even if it is on a STT site. The government would risk being challenged to only providing traditional “transitional temporary housing” and not add positive value to the local community.
- We appreciate the Government's consideration and implementation of innovative new ideas to address shortages such as the pilot scheme to utilize underserved hotel rooms and guesthouses for transitional housing⁶. We believe this idea will go some way to address both a need for decent living conditions in emerging emergency situations, as well as support an industry that is suffering – thereby protecting jobs of low-income families. In the implementation of this scheme, we encourage the recognition of the distinction between ‘temporary’ and ‘transitional’ and that guidelines be produced and circulated on the standards on hotel accommodation, length of time for each stay, number of people in each room etc. Within this same scheme, we strongly encourage the HKSAR Government to take on board learnings from overseas where similar initiatives have had mixed results. The main contributing factor to when the scheme has been less successful, seems to be the lack of service providers to manage the rooms and help transition residents into more permanent housing. Taking on board these learnings, we urge the Government to identify

³ Paragraph 132 <https://www.policyaddress.gov.hk/2020/eng/p130.html>

⁴ <https://www.theguardian.com/artanddesign/2019/jun/20/council-housing-its-back-its-booming-and-this-time-its-beautiful> / <https://sticerd.lse.ac.uk/dps/case/cr/casereport99.pdf> / <https://www.londonfirst.co.uk/sites/default/files/documents/2018-05/Estate-Regeneration.pdf> / <https://www.communityledhousing.london/projects/>

⁵ https://www.polyu.edu.hk/disi/images/pdf/TSH_report.pdf

⁶ Paragraph 93 <https://www.policyaddress.gov.hk/2020/eng/p91.html>

sufficient stable service providers and provide adequate financial support to ensure their continued capacity to manage such a project with wide-scale potential.

3. Substandard housing conditions in Subdivided Units

- Launching a trial scheme to provide cash allowance for low-income families awaiting Public Rental Housing allocation for a prolonged period, is a positive step. We support implementation such that households receive subsidies that make their rental costs affordable (a maximum of 30% of income).⁷
- Conducting a study on tenancy control for subdivided units (SDUs) is a positive step and we are grateful for the opportunity to contribute our findings from comparative tenancy solutions from overseas. We are encouraged that the HKSAR Government Task Force for Study on Tenancy Control of Subdivided Units are holding frequent public consultations, conducting outreach to NGOs and the community, and taking an innovative and creative approach to finding solutions. We encourage the further inclusion of SDU tenants at the decision-making level: by holding further rounds of public consultations after concrete suggestions have been formulated, to involve tenants and community members in the co-design of equitable and sustainable ways to address affordable housing issues in SDUs.
- We promote written rental agreements that state the rights and obligations of both tenants and landlords, signed by both parties, and registered legally. Under the current system SDU tenants have few protections or legal recourse and most are without security of tenure.
- Overcharging for utilities is a recurring problem in SDUs that the Task Force has acknowledged. We urge the Task Force to consider proactive follow-up on this problem, taking into account that relying on tenants to register their complaints with utility companies will not offer enough protection to households concerned about landlord reprisals such as eviction.

Conclusion

We recognize that effective housing solutions must address the right to adequate housing as outlined by UN Habitat. In housing projects – whether it be new builds or addressing substandard living conditions in existing builds, we urge the HKSAR Government to consider and apply the elements of the right to adequate housing: security of tenure, availability of services, affordability, habitability, accessibility, location and cultural adequacy.

In consideration of all the above initiatives and more, we urge the HKSAR Government to make every effort to align all housing initiatives to the 2030 Sustainable Development Goal 11 – making cities and human settlements inclusive, safe, resilient and sustainable, with a particular focus on 11.1, that is to ensure access for all to adequate, safe and affordable housing and basic services, and upgrading urban slums.

To discuss how to get involved with Habitat for Humanity and support our public policy and research work, please email Megumi Harker, Public Policy & Research Manager at:

megumi.harker@habitat.org.hk

⁷ Paragraph 94 <https://www.policyaddress.gov.hk/2020/eng/p94.html>