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6 September 2024

Online at <https://mpra.ub.uni-muenchen.de/122429/>
MPRA Paper No. 122429, posted 18 Oct 2024 13:49 UTC

ANALYSIS OF THE EVOLUTION OF AFFORDABLE AND SOCIAL HOUSING IN ENGLAND, ITALY, POLAND, AND THE NETHERLANDS

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ABSTRACT

The social and affordable housing situation across Europe is characterised by a high degree of complexity, with a number of challenges emerging from a number of different factors. These include the rising costs of housing, the reduction in public funding, and the evolution of housing models. The term “affordable housing” is defined in different ways in various countries. The effectiveness of these definitions in meeting the needs of different population groups influences the perception of what constitutes affordable housing. The central research questions examine the relationship between national and sub-national definitions of affordable housing and their impact on housing policy outcomes. A mixed-methods approach is employed in four countries, combining desk research, policy analysis, key informant interviews, and stakeholder workshops. The countries under consideration are England, Italy, Poland and the Netherlands. This methodology permits a comprehensive examination of the policy framework and emerging trends within the affordable housing sector. The principal findings demonstrate that the affordable housing sector has become a distinct entity, targeted middle-income households and exhibiting considerable variation across countries. The research underscores the necessity for precise definitions of affordable housing and advocates for augmented government intervention and private sector involvement to enhance housing affordability.

Keywords: affordable housing definition; affordable housing policies; social housing; England; Italy; Poland; The Netherlands

JEL Classification: M14, M38, O8

1. SUMMARY

The article *An exploration of concepts and policies on 'affordable housing' in England, Italy, Poland and the Netherlands*, by Darinka Czischke and Gerard van Bortel examines the dynamic evolution of definitions, policies, and

implementation of affordable housing across these four European countries. It analyses the increasing distinction between the term “affordable housing” and “social housing” and highlights the differences and parallels between the two concepts in the various national contexts. The article was published online 22 February 2018 in the *Journal Housing and the Built Environment*, 38, pp. 283-303. It presents the findings commissioned by the European Investment Bank, which examines the current trends in definitions, programmes, and policies related to both social and affordable housing. The exploration encompasses an analysis of the disparities and similarities in the manner by which these countries address the issue of affordable housing, the role of various stakeholders, and innovative policies that have been developed to address housing affordability issues. The findings reveal a chronic undersupply of affordable housing, exacerbated by demographic changes and economic pressures, particularly in England and the Netherlands. Each country has unique characteristics in its social and affordable housing sector, with different definitions and eligibility criteria affecting access for different income groups. The article concludes by discussing the divergence between the social and affordable housing sectors in the countries studied, with social housing increasingly becoming a residual tenure for the lowest income households (Czischke and van Bortel, 2018).

The findings of the article highlight the significance policy implications which include the need for stabilising mechanisms to ensure continued investment in affordable housing, especially in countries relying on private sector financing. The governments have to play a more active role in improving the conditions for affordable housing development, particularly in terms of access to land and finance. This underlines the importance of sophisticated, context-specific strategies to address housing affordability and ensure the provision of adequate housing for all income groups (Czischke and van Bortel, 2018).

2. INTRODUCTION

At the beginning of the article, the authors provide a detailed account of the present condition and recent developments in social and affordable housing across Europe. It outlines the consequences of diminished public funding, the influence of privatisation policies, and the diversification and hybridisation of social housing models. The authors approach in the introduction is analytical and critical, focusing on the complexities and challenges surrounding the concept of affordable housing in Europe. A key focus of the text is on the increasing difficulty for many Europeans to find adequate and affordable housing, a problem exacerbated by rising housing costs and growing demand. The article illustrates the increasing attention being paid to the issue of affordable housing at the policy level, despite the absence of a clearly defined and universally accepted definition of what constitutes “affordable housing”. The authors adopt a working definition of

affordable housing as housing with rents below the market rate, accessible to a broader range of incomes, and examine how this definition is reflected in national policies.

The study referenced in the article, commissioned by the European Investment Bank (EIB), examines social and affordable housing trends in four European countries. It proposes a working definition of affordable housing as rental housing offered below market rates to a broader range of incomes than traditional social housing. The article delves into the specific findings from four countries – England, Italy, Poland, and the Netherlands – where affordable housing is emerging as a distinct sector.

The introduction is logical and empirically based argument, supported by data and research. Broader trends are successfully linked in the social housing sector with specific national examples, offering a comprehensive examination of the concept of affordable housing and its implications for policy and practice in Europe. The introduction outlines the intended use of the data presented in the study. It presents empirical data to substantiate the claims made about the burden of housing costs and the increasing demand for affordable housing. The argument is based on a substantial body of research, drawing on multiple studies and reports to substantiate its assertions (Boelhouwer and Houard, 2014; Ronald, 2013; Scanlon *et al.*, 2014). The introduction presents a coherent flow of ideas, commencing with an examination of the context of affordable housing in Europe, proceeding to an analysis of the challenges faced, and concluding with an argument for the necessity of clear definitions.

While the introduction is logical and based on empirical observations, it can be enhanced by the incorporation of more illustrative examples or data to reinforce its assertions. For instance, although the text references the dearth of suitable, affordable housing, it lacks the statistical and case study evidence required to demonstrate the gravity of this issue in the countries under discussion. The incorporation of such empirical evidence will serve to enhance the credibility of the introduction and provide a more robust foundation for the subsequent analysis. It might be argued that the introduction presents a logical and coherent account of the importance of affordable housing in Europe, while also acknowledging the inherent complexity of defining and providing housing.

3. LITERATURE REVIEW

The authors present evidence of knowledge of the topic of research through extensive references to and descriptions of relevant and current research (Scanlon *et al.*, 2014; Boelhouwer and Houard, 2014; Ronald, 2013, Mullins *et al.*, 2012; Housing Europe; 2017). The article includes citations of a wide range of sources that discuss various aspects of affordable and social housing policies in Europe. It addresses the definitions, programmes and policies related to these housing

sectors, emphasising the evolving nature of affordable housing in the context of different national frameworks (Ball, 2015; Gilbert, 2015; Yates and Milligan, 2012; Haffner and Heylen, 2011; Stone *et al.*, 2011; Oxley, 2012).

The article provides an analysis of recent developments in the rental market, with a particular focus on England and the Netherlands. In these countries, government measures have been introduced with the objective of attracting private investment into affordable housing. These measures include the relaxation of rent regulations and the provision of incentives for private landlords. Challenges remain, including the reluctance of private landlords to invest due to financial burdens such as the Landlord Levy. The article also examines the emergence of new rental tenures in countries with smaller social housing sectors, such as Poland and Italy, where affordable housing is increasingly targeted at key workers and young professionals who do not qualify for social housing but are unable to afford market rates (Apps, 2014; Jadach-Sepiolo and Jarczewski, 2015; Borg, 2015).

The literature cited encompass empirical data, theoretical frameworks and policy analyses that illustrate the distinctions and overlaps between affordable housing and social housing. The article emphasises the importance of a comprehensive understanding of these concepts in consideration of recent developments and trends, which are informed by a multitude of scholarly and policy-oriented sources. The authors engage with local and national stakeholders through workshops, thereby further enhancing the discussion with practical insights and experiences derived from the field.

The named references demonstrate a comprehensive understanding of the political context, contemporary challenges, and innovative approaches to discussing and promoting affordable housing policies. Including these references not only supports the arguments of the authors but also illustrates their extensive engagement with both academic literature and practical efforts related to the topic. This approach enriches the article with a broad perspective that encompasses theoretical insights, empirical findings, and applications in the social and physical environment, and proves an extensive knowledge of the research topic.

4. METHODS AND DESIGN OF THE STUDY

4.1 Research questions

The authors present a detailed overview of the research design and methodology employed to address the research questions, thereby demonstrating a clear and systematic approach to the investigation of the various definitions and political standards in relation to affordable housing. The research questions are presented in a methodical and systematic manner, emphasising the critical need for a clear definition of the term “affordable housing”. The authors initiate their investigation by articulating the central inquiry: how do the various national and sub-national definitions of affordable housing relate to one another, and what

impact do these definitions have on the outcomes of housing policy? This question is situated within the broader context of the challenges faced by various population segments in accessing suitable accommodation, a topic that has been widely studied. The authors highlight that while previous research has predominantly concentrated on the obstacles encountered by diverse population groups in accessing suitable accommodation, there has been a noticeable lack of attention directed towards the intrinsic definition of “affordable housing”. This provides a foundation for the authors to examine the institutional representation of affordable housing in national policies and identify the primary actors involved in its provision. The authors, while acknowledging the extensive research that has been conducted on the subject of affordable housing, identify a critical gap in understanding the precise meaning of the term, which is essential for informed policy discussions and effective interventions.

The research questions are posed as a critical examination of the definitions and implications of affordable housing within national policies, with the objective of clarifying the concept and its relevance in addressing housing challenges across different contexts. The approach of the authors emphasises the necessity of comprehending these definitions in order to inform future policy developments and research agendas within the field of affordable housing.

4.2 Materials and assessment instruments

The authors employ a variety of materials and assessment instruments to gather data for their research on affordable housing in England, Italy, Poland, and the Netherlands. The primary method of data collection involves a comprehensive review of secondary sources, including journal articles, books, policy reports, and statistical data. This comprehensive literature reviews a foundational understanding of the extant knowledge and trends pertaining to affordable housing in the selected countries. In addition to the aforementioned methods of data collection, the authors employ interviews with key informants, including national experts and stakeholders involved in policymaking. The interviews are instrumental in validating and enhancing the insights gained from the secondary data. The objective of these interviews is to clarify issues and enhance comprehension of the affordable housing landscape in each country.

The research is extended through the inclusion of a second phase of data collection, which was conducted through two half-day workshops held with local and national stakeholders in the Netherlands and Italy. The workshops facilitated discussions among the various participants, allowing for the exchange of insights and experiences related to affordable housing policies and practices. The workshops provided a forum for the collection of qualitative data and the fostering of collaboration among stakeholders. To ensure a comprehensive understanding of the subject matter, the authors conducted preparatory desktop research and follow-up interviews via telephone and Skype. This supplementary phase of data

collection is designed to elucidate and corroborate the information obtained during the workshops, thereby ensuring a comprehensive evaluation of the affordable housing situation in the countries under study.

The materials and assessment instruments employed in this study comprised a combination of secondary literature, interviews with key informants, stakeholder workshops, and follow-up discussions. This multi-faceted approach enables the authors to gather a range of perspectives and insights, contributing to a more nuanced understanding of affordable housing policies and their implications across the four countries.

The materials and assessment instruments utilised in the study appear to be aligned with the research questions. With regard to the validity and reliability of the instruments employed, the study does not explicitly indicate how these were determined. The study design is logically constructed in order to measure the impact of the policies and measures in the various EU countries, which serves to enhance its validity.

4.3 Procedures for collecting data and conducting the study

The selection of key informants for the research conducted in this study is guided by specific criteria with the objective of ensuring a comprehensive understanding of affordable housing policies and practices in England, Italy, Poland, and the Netherlands. Although the article does not explicitly enumerate the selection criteria, it is possible to infer several important aspects based on the context provided. The key informants include national experts and policymakers who possess considerable knowledge and experience in the field of housing policy. This indicates that the selection process placed a premium on individuals with a profound grasp of the affordable housing landscape, including those engaged in the creation and execution of pertinent policies. The expertise of these individuals provides valuable insights into the challenges and opportunities present in the affordable housing sector across the countries under study. As a second consideration, the diversity of perspectives is likely to have been a factor in the selection process. The objective is to obtain a comprehensive range of perspectives, encompassing representatives from diverse sectors, including government agencies, non-profit organisations, and potentially private sector actors engaged in affordable housing initiatives. This diversity will enrich the data collected and ensure that multiple facets of the affordable housing issue are addressed. The context indicates that the interviews are designed to validate and complete the information obtained from secondary sources. As a result, informants who can provide corroborative evidence or additional context to the existing literature are prioritised. This approach increases the reliability and depth of the findings presented in the study.

4.4 Analysis of the data

The analytical frameworks presented in the article demonstrate a clear alignment with the research question and problem statement. The text presents an analysis of recent developments in housing policies in the four EU countries mentioned, with a particular focus on affordable housing, the role of government intervention, and the involvement of various stakeholders in housing finance. The research appears to investigate the impact of different mechanisms and policy changes on the provision of affordable housing, which is directly related to the broader problem of housing affordability and availability for different income groups.

As an example, the Polish housing finance system has recently been reformed in order for the state to play a greater role in providing housing solutions to its population. The reforms have included the establishment of preferential loans for those in need of affordable housing and the formation of partnerships with the European Investment Bank for the purpose of providing further assistance in the form of financial backing for housing projects. In the Netherlands, the text presents an analysis of government interventions in the housing market, including rent regulation and the role of housing associations in providing social housing. These aspects reflect a concentrated investigation into the efficiency of housing policies and financial instruments in addressing the needs of diverse segments of the population, particularly those experiencing affordability challenges but not eligible for social housing. The analytical frameworks presented are pertinent to the research questions and problem statement, as they examine the mechanisms through which housing affordability is addressed in diverse contexts.

The article employs a combination of desk research and interviews with key informants, enabling a comprehensive exploration of the topic from multiple perspectives. The methods are aligned with the research questions, which aim to provide clarity on the definitions, strategies and roles of the various actors within the affordable housing sector. By integrating qualitative and quantitative data, the study is capable of adopting a more comprehensive perspective on the challenges and opportunities within the sector, which is essential given the complexity of the topic. The selected methods of desk research and interviews are appropriate for the research work, as they effectively facilitate a comprehensive investigation of affordable housing in the countries mentioned. This methodological approach supports the objectives of the study and enhances the overall validity and relevance of the results.

5. RESULTS

The data presented in the article is precise and well-structured, reflecting a comprehensive examination of affordable housing across England, Italy, Poland, and the Netherlands. The authors employ a combination of quantitative and qualitative data, thereby enhancing the precision of their findings. To illustrate,

the article provides precise data regarding the number of affordable rental properties constructed during the 2013/ 2014 reporting period. This data reveals that 19,740 affordable rental properties and 10,920 social rental properties were delivered, while only 790 intermediate rental properties were produced. This level of detail permits a clear understanding of the housing landscape during that period. The authors discuss the criteria for affordable housing eligibility, including income thresholds determined by local authorities on a project-by-project basis. This specificity in defining eligibility criteria contributes to the precision of the data, as it outlines the parameters within which affordable housing operates. The authors also draw attention to the discrepancies in rent calculations between affordable and social housing, noting that affordable rents are limited to a maximum of 80 % of local market rents. This is a crucial aspect for comprehending the affordability issue. It is vital to acknowledge that, despite the data being presented with a high degree of precision, the article acknowledges the lack of exact figures on the number of households living in social housing at the national level. This limitation suggests that while the data is precise where available, there are areas where comprehensive statistics may be lacking, which can affect the overall understanding of the affordable housing situation.

The findings presented in the article are both adequate and logical, as they are structured to provide a comprehensive overview of the affordable housing landscape across England, Italy, Poland, and the Netherlands. The authors address the housing market conditions in each country in a systematic manner, examine the characteristics of the social housing sector, and analyse the specific definitions and attributes of affordable housing. This structured approach enables a clear comparison and understanding of the various contexts in which affordable housing operates. The findings suggest that affordable housing is becoming a separate field from social housing, in line with the evolving definitions and policies observed in the four countries which form the subject of this study. The authors identify and examine a selection of innovative policies and practices that have emerged in recent times, thereby demonstrating that the research effectively captures current trends and developments. This is particularly significant given the growing prominence of the term “affordable housing” in policy discourse, which the authors have effectively documented. The findings are corroborated by a synthesis of desk research and interviews with key informants, which adds depth and credibility to the analysis. The utilisation of qualitative data derived from interviews enables the acquisition of detailed insights into the challenges and opportunities encountered by stakeholders within the affordable housing sector. This methodological choice serves to enhance the logical coherence of the findings, as it integrates both quantitative and qualitative perspectives. The article also acknowledges certain challenges, such as the limited volume of investment funding for affordable housing and difficulties in accessing affordable land. The authors demonstrate an acute awareness of the complex interrelationships between

the various factors that contribute to the issue of affordable housing, focusing on the key issues that facilitate a comprehensive understanding of this multifaceted problem.. The recommendations for government agencies to assume a more proactive role in enhancing the conditions for affordable housing development serve to reinforce the logical coherence of the findings, as the authors address the identified challenges and propose solutions that are both feasible and actionable.

6. CONCLUSION

The article presents a number of significant insights into the concept and associated policies pertaining to affordable housing in England, Italy, Poland and the Netherlands. The article makes the initial observation that affordable housing is increasingly regarded as a discrete sector, distinct from social housing. The definitions and characteristics of these two terms vary across the countries in question. The authors emphasise the necessity of developing a precise and operational definition of affordable housing that considers the various international differences. A definition of this kind is of great importance for the comprehension of the diverse housing policy approaches that are in operation in different contexts.

The relationship between social housing and affordable housing is another crucial area of consideration. The article identifies a trend of social housing becoming increasingly specialised, serving primarily low-income individuals and those with specific needs. This pattern is evident across Europe, indicating a broader shift in housing policy that has significant implications for the future of social housing. The authors consider the similarities and differences between England and the Netherlands in terms of social housing targeting and the role of housing associations. Both countries are moving towards stricter targeting of social housing, but in England, housing associations are broadening their services, while in the Netherlands, their counterparts are focusing more on the regulated social housing market. The authors emphasise the necessity of government intervention in maintaining a stable affordable housing sector, particularly given the increasing prominence of private financing. They propose the implementation of mechanisms such as government incentives and solidarity guarantee funds to ensure sustained investment in affordable housing.

In terms of conclusion, the article provides valuable insights into the evolving landscape of affordable housing, underscoring the importance of clear definitions, targeted policies and active government involvement. These findings contribute to the academic discourse on housing and offer practical recommendations for policymakers seeking to enhance affordable housing provision across Europe.

One of the key findings of the study is the emergence of an affordable housing sector in all four countries, characterised by policies designed to assist middle-income households in accessing rental housing at prices below market rates. The definitions of “middle-income” and “below-market” prices vary across regions

and cities, indicating a lack of uniformity in the conceptualisation and application of affordable housing. The article identifies three principal target groups for affordable housing: households with unstable incomes, families, and mobile workers. This reflects the diverse needs that these policies must address.

The authors of the research paper do not explicitly identify and address the limitations and problems encountered while using the chosen methods of desk research and interviews with key informants. The potential limitations of these methodologies must be considered in the context of common research practices and the provided contexts. A potential limitation of desk research is the reliance on existing literature and data, which is not always comprehensive or up to date. The authors can encounter difficulties in accessing recent or pertinent studies, particularly in a field such as affordable housing that is subject to rapid evolution. The availability of data varies significantly between countries, which can result in inconsistencies in the findings. For example, while the article focuses on four countries, the depth of available information is likely to vary, particularly in countries such as Poland and Italy, where the social housing sector is smaller and less well documented. The interviews with key informants, while offering valuable insights, are not without potential for introducing bias based on the perspectives of the individuals interviewed. The selection of informants does not necessarily reflect the full range of perspectives within the affordable housing sector, which has the potential to bias the findings. The authors can encounter difficulties in obtaining the participation of key stakeholders, which may limit the diversity of opinions and experiences captured in the study. The qualitative nature of the interviews introduces the potential for challenges in data analysis, as responses may be subjective and open to interpretation. This subjectivity can complicate the process of drawing generalisable conclusions from the findings. It is essential that the authors navigate these complexities to ensure that their analysis remains robust and reflective of the broader context of affordable housing.

7. DISCUSSION

A reasonable conclusion based on the analysis of the article is that the authors have clearly addressed the set objectives. In their study, the authors demonstrate how non-profit and private sector organisations are playing a prominent role within the affordable housing sector. The authors examine the distinctions between countries with substantial and modest social housing sectors. The discussion addresses the policy challenges, market volatility, and the tendency for divergence between the social and affordable housing sectors. Despite acknowledging the absence of definitive evidence in certain domains, including private sector investment in affordable housing in the Netherlands, the authors present a comprehensive overview of the landscape and associated challenges. It can thus conclude that the objectives have been largely achieved, despite the

potential for complexity and volatility in the housing market to cast doubt on the veracity of this conclusion in relation to some issues.

The findings presented in the article are interpreted in an adequate manner, thereby providing a comprehensive understanding of the affordable housing landscape in England, Italy, Poland, and the Netherlands. It allows a clear comparison across the four countries, which is essential for drawing meaningful conclusions about the variations and commonalities in affordable housing policies and definitions. The article commences with the establishment of a working definition of affordable housing, which is of paramount importance for the contextualisation of the subsequent findings. This definition is sufficiently expansive to encompass the diverse interpretations of affordable housing across the countries under study, thus enabling a nuanced analysis of the sector. The authors demonstrate an effective delineation between affordable housing and social housing, which is a crucial aspect of their interpretation, as it clarifies the specific focus of their research. In outlining the findings, the authors adopt a structured approach, encompassing an overview of the general housing market, the social housing sector, and the characteristics of the affordable housing sector in each country. This systematic presentation allows for an in-depth comprehension of complexities inherent to the housing policies of each country, as well as the socio-economic factors that inform them. The incorporation of contemporary developments and trends enhances the interpretation by situating the findings within the prevailing socio-political context of each country. The authors address the challenges faced in the affordable housing sector, including limited investment funding and difficulties in accessing affordable land. These challenges are interpreted in the context of broader economic conditions and policy frameworks, with the suggestion that government intervention is necessary to create favourable conditions for affordable housing development. This interpretation is not only relevant but also actionable, as it provides insights for policymakers on how to improve the situation.

From an external perspective, further research can be conducted on the following questions in the context of affordable and social housing construction within the EU:

- What are the discrepancies between the national and local definitions of affordable housing?
- What modifications can be made to the definition of affordable housing in order to encompass a more diverse range of income groups?
- What part will private sector actors play in the future of affordable housing?
It will be beneficial to ascertain whether for-profit housing providers will invest in the affordable housing market, particularly in areas where there is high demand.
- What modifications to policy are required to achieve a balance between contributions from the private and public sectors?

The final area for consideration is that of policy interventions and the role of the government.

- What measures might government agencies at the EU, national, regional, and local levels adopt to facilitate the development of affordable housing, particularly by ensuring access to affordable land and funding?
- What policy stabilisations are required to ensure the maintenance of investment during periods of market fluctuation?

The question of social housing convergence or divergence is a significant one.

- What is the projected trajectory of social housing in relation to affordable housing?
- The question thus arises as to whether the divergence or convergence will persist in the various EU member states.
- What measures might be taken to provide further support for emerging models such as collaborative and resident-led housing initiatives?
- What part can social innovation play in addressing the challenges of housing affordability?

These questions underscore deficiencies in the extant understanding and endeavour to illustrate how affordable housing can evolve in a manner that is responsive to the needs of diverse populations.

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