

## Introduction

### 3.1 Key information on the Partnership “Housing”

During the Dutch Presidency of the EU in the first half of 2016 the Pact of Amsterdam was adopted by EU ministers of the Interior. It states that European cities will be more involved with the creation of EU legislation, EU funding and knowledge sharing. The relevance of this involvement is highlighted by the statistics that cities and urban areas now house more than 70% of all Europeans.

This simultaneously makes cities the drivers of innovation and the European economy but also the places for many of the societal challenges of the 21<sup>st</sup> century. In order to ensure that this is reflected by EU legislation, funding and knowledge sharing, the Urban Agenda for the EU was created. The Urban Agenda is composed of 12 priority themes essential to the development of urban areas. Each theme has a dedicated Partnership. These partnerships bring together cities, Member States and European institutions. Together, they aim to implement the Urban Agenda by finding workable ideas focused on the topics of EU legislation funding and knowledge sharing. One of the partnerships is the **Partnership on Housing**.

The Partnership is co-coordinated by the city of Vienna and Slovakia. Members of the Partnership are the cities of Vienna, Lisbon, Poznan, Riga, Scottish Cities Alliance as well as EURO CITIES and the Member States of Slovakia, Latvia, Luxembourg, The Netherlands, Slovenia. There are also two observers (Czech Republic and Sweden). Stakeholder partners include AEDES, Housing Europe, International Union of Tenants (IUT), European Commission DGs including DG REGIO, DG ENER, DG EMPL and the European Investment Bank. Experts from the Urban Studies at SciencesPo faculty of the University of Paris and URBACT contribute to the partnership as well.

#### Focus areas and activities

To frame its work, the Partnership identified three thematic areas, which led to a division of work into three sub groups at the Partnership meeting in Geneva (September 2016). Partners agreed to undertake detailed work to support the development of specific actions under these themes. The sub groups are covering the following themes:

- **State Aid and social housing:** state aid, competition law, definition of social housing under Service of General Economic Interest (SGEI) rules, VAT issues.
- **Finance & Funding:** investments and instruments, loans, “golden rule”, European semester, innovative funding, analysis of obstacles and good practice solutions in funding and financing of affordable housing.
- **General Housing Policy:** land use, building ground, spatial planning, renovation, energy efficiency, anti-speculation security of tenure, co-design, rent stabilisation, support for vulnerable groups.

### 3.2 On the Public Feedback and its analysis

The Public Feedback is part of a process to consult on emerging actions and recommendations developed by the Partnership on Housing. Other actions are likely to be developed by the Partnership in due course.

Through the Public Feedback (opened from 17<sup>th</sup> July 2017 to 25<sup>th</sup> August 2017) stakeholders were invited to provide views on some initial draft actions proposed by the Partnership. This feedback will be taken into consideration by the members of the Partnership on Housing for the further development of their actions and recommendations, which will be presented to the DG meeting on urban matters (DGs responsible for urban matters in their Member States, the European Commission, the CoR, CEMR and EUROCITIES) taking place on 26 October 2017.

### 3.3 Overview of Profiles of Respondents

As shown in table 1 below, the total number of responses submitted was 67 with 45 submitted by individuals and 22 submitted on behalf of individual organisations.

**Table 1: Country distribution of public feedback respondents per 'individuals' or 'organisations' stakeholder group**

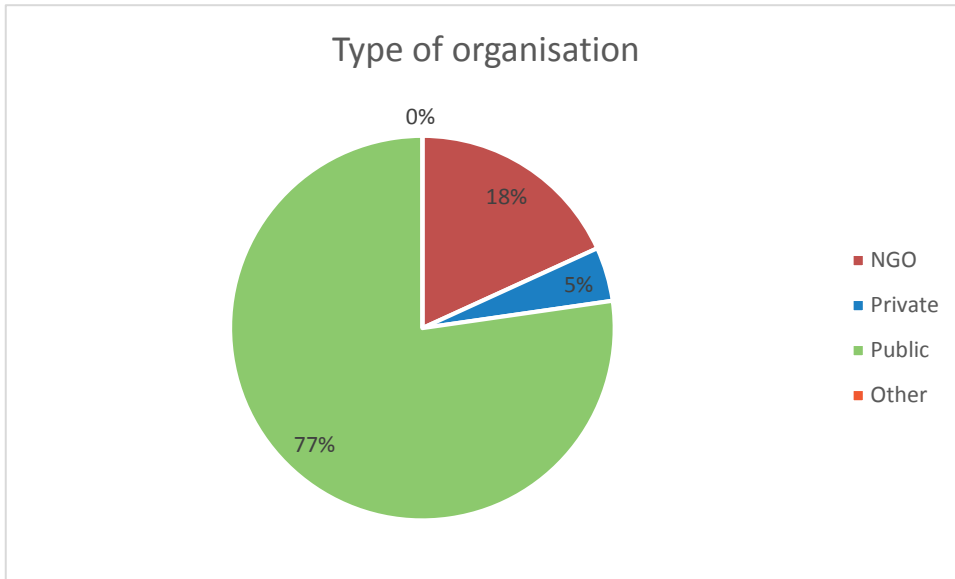
Country	Individuals		Organisations	
	n	%	n	%
Austria	36	80%	3	13.6%
Belgium	3	7%	2	9.1%
Bulgaria	0	0%	0	0%
Cyprus	0	0%	0	0%
Croatia	0	0%	0	4.5%
Czech Republic	3	7%	2	9.1%
Denmark	0	0%	0	0%
Estonia	0	0%	0	0%
Finland	0	0%	2	9.1%
France	0	0%	0	0%
Germany	1	2%	4	18.3%
Greece	0	0%	0	0%
Hungary	0	0%	0	0%
Iceland	0	0%	0	0%
Ireland	0	0%	0	0%

Country	Individuals		Organisations	
	Count	Percentage	Count	Percentage
Italy	1	2%	0	0%
Latvia	0	0%	0	0%
Liechtenstein	0	0%	0	0%
Lithuania	0	0%	0	0%
Luxembourg	0	0%	0	0%
Malta	0	0%	0	0%
Netherlands	1	2%	2	9.1%
Norway	0	0%	0	0%
Poland	0	0%	0	0%
Portugal	0	0%	1	4.5%
Romania	0	0%	0	0%
Slovakia	0	0%	1	4.5%
Slovenia	0	0%	0	0%
Spain	0	0%	3	13.6%
Sweden	0	0%	0	0%
United Kingdom	0	0%	0	0%
Other	0	0%	1	4.5%
<b>Total (n = 67)</b>	<b>45</b>	<b>100%</b>	<b>22</b>	<b>100%</b>

### 3.3.1 Distribution of organisations

As shown in figure 1, over 75% of respondents were from public organisations and 18% were from NGOs. Only one respondent was from a private sector organisation.

**Figure 1: Type of organisations**



As shown in table 2 below, public organisations responding to the public feedback were evenly distributed across the local, regional and national levels; there were no responses from public organisations operating at the EU or international levels.

**Table 2: Type of public organisations**

	%
Local	35%
Regional	29%
National	35%
EU	0%
International	0%

## 4 Results of the Public Feedback

### 4.1 Introduction

This section sets out the results of the Public Feedback broken down by the common themes of the urban partnerships and the emerging actions of the Housing Partnership.

### 4.2 Theme 1: Better regulation

This theme focuses on the effects of EU regulations in supporting public investments in affordable housing. Many cities are facing population growth creating even more pressure on the housing market, and a lack of affordable housing for broad parts of their populations at the same time. Developments in recent years in Europe including the uncertainty and instability of the finance framework and the lack of legal clarity have led to an alarming decline in investment at the local level. In order to address all these challenges, national and local authorities must be brought into a position to adopt supportive housing policies in order to create the right conditions and incentives for investment in social and affordable housing.

#### **Action 1: Guidance on EU regulation and public support for housing**

Evidence from a wide range of cities and Member States shows that there is an urgent need for a clarification on the effects of EU regulations including state aid rules to state support available for affordable and social housing in general and multi-level apartment buildings in particular in order to deblock investment potential, especially on local level. In this context, the acceptance of sustainable goals like social mix and social cohesion as valid public policy objectives for which State aid may be granted shall be explored.

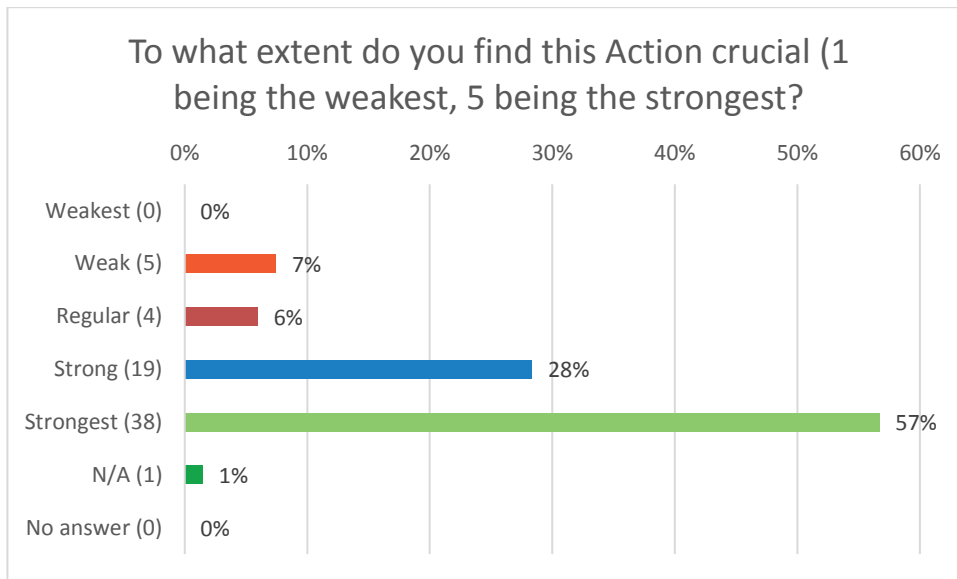
The action is the delivery of a guidance paper on EU regulations and public support for affordable housing. It is expected to contribute to better knowledge at all levels on the application of EU regulations on public support measures for the provision of social and affordable housing. It may help to develop different perspectives regarding the application and interpretation of the regulations and lead to improvement of the current legislation, thus allowing for deblocking investment potential and contributing to more social cohesion, social mix and giving positive impulses to the urban economy.

#### *4.2.1 Importance of the issue according to respondents*

The below graph considers the respondents' views on the importance of the need to clarify the effects of EU regulations, including state aid rules relating to affordable and social housing. The graph shows that 85% of respondents believe that issues surrounding EU regulations in supporting public investment in affordable housing are of high importance ('strong' or 'strongest' ratings). Out of these, 57% believe the problem to be most crucial.

None of the respondents believed that there is no problem with the clarity of current EU regulations and only 13% believe the issue to have low importance (weak or regular).

**Figure 2: Importance of the issue**



Source: Public Feedback responses – Housing Partnership

Examples of comments stating the issue was important included:

*“Losing time due to unclear regulations has to be avoided.”*

*“In our opinion, flexibility is important in the implementation of the rules on SGEI. We think there should be no definition of social housing in EU Law; this should be left to the Member States.”*

*“A more comprehensive recognition of the importance of housing issues in the SGEI and other competition-related policies, and a more developed and clearer guidance in this regard could contribute to improve the use of state aid support and funding in the housing sector.”*

*“The current state aid regulations provide considerable scope for flexibility. Unfortunately this is not always used. Actions to support better implementation and foster public support for affordable & social housing are therefore very useful.”*

*“For me it is very important that this is clarified.”*

There were very few comments that suggested respondents did not feel the issue was important; other comments generally supported the Partnership’s focus on this issue while highlighting some qualifications or limitations:

*“It would be important to include the concept of social inclusion, rather than the concept of social mix. The objective of public policies should be to create societies that allow the cohabitation of different persons and groups, and to ensure that the fundamental rights of each and every person are guaranteed.”*

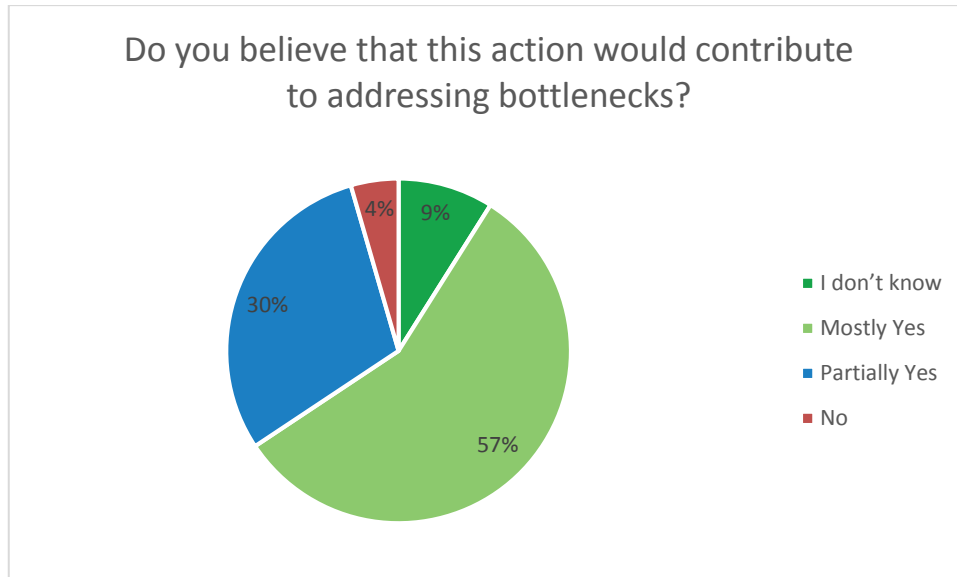
*“We find this issue crucial and we support it, especially for affordable housing in multi-level apartment buildings in Eastern and Central Europe (CEE). However we need to stress that lack of affordable housing in Europe especially in CEE is not the problem of effects of EU regulations and state aid rules. The problem is rather that CEE Member States do not use EU and national funds*

for social affordable housing. CEE Member States actually need EU support and regulation in this topic as there are not many options for affordable housing. We suggest moving from market enabling policy towards smart regulation in housing.”

#### 4.2.2 Contribution of the action to addressing the identified bottlenecks

Almost 90% of respondents (‘mostly yes’ and ‘partially yes’) perceived that action 1 would contribute to the addressing the bottlenecks identified concerning clarity of regulations regarding state subsidies for affordable housing (figure 3).

**Figure 3: Contribution of action to addressing bottlenecks**



Source: Public Feedback responses – Housing Partnership

Examples of supportive comments included:

*“It will help to clarify the regulations and this can help to lead to actions.”*

*“The Guidance Paper states that the Services of General Economic Interest (SGEI) should be defined at a national, regional or local level. This could be a positive development and lead to a more precise local policy.”*

*“This guidance paper is welcomed by the cities, which are in charge to provide social and accessible housing. Deblocking investment potential and contributing to more social cohesion, social mix and more positive Impulses to the urban economy are welcome.”*

Other comments were either less positive or generally positive about the general content of the action but with qualifications. Examples included:

*“I’m not sure if a guidance paper on EU regulations and public support for affordable housing can make anything better. The biggest problem is with slow constructions of new housing regarding the current legislation. So if the current legislation will change there is some space for a change.”*

*“This action will contribute to better knowledge but there are also other important aspects such as the dissemination process of the guidance, the clarity of the guidance, the number of stakeholders involved, and so on.”*

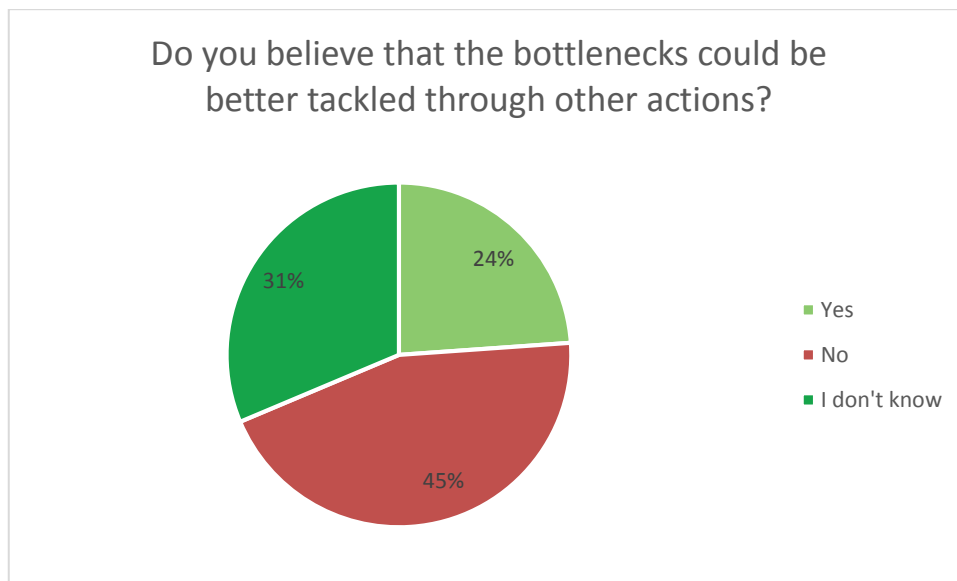


*“A guidance paper is of course very valuable and better knowledge is crucial. But we also need a clear and strong call to action.”*

*“Such a guidance paper should address more than state aid. Relevant issues include: Prioritization of affordable housing in the new MAFF, ESIF & EFSI; review of VAT regulations & safeguarding exemption of housing as part of social policy; EU macro-economic surveillance mechanisms as barrier to investment in social & affordable housing; implementation of the European Pillar of Social Rights (priority 19) etc.”*

As shown in the chart below (figure 4), 45% of respondents did not believe that the bottlenecks concerning state aid could be better dealt with through other actions however only 24% thought that bottlenecks could be better tackled through other actions as 31% were not sure.

**Figure 4: Use of other actions**



Source: Public Feedback responses – Housing Partnership

Additional actions suggested by the respondents linked to the better regulation theme included:

1) *“...a General Framework regarding Social and Affordable Housing that could bring conceptual clearness, some common criteria to access social housing and a more integrated European approach to these matters.”*

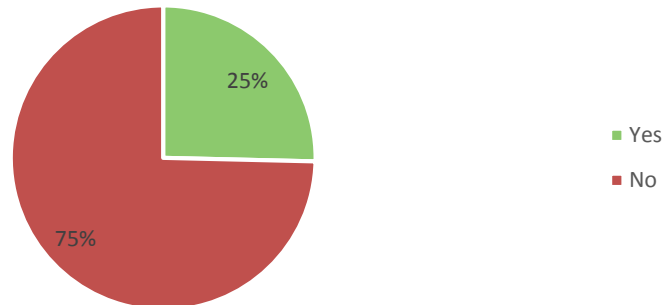
2) *“I believe an additional workshop or some kind of in person capacity building activities would be very effective.”*

Only 25% of respondents were aware of other initiatives or documentation developed at international, EU, national, regional or local level that could be relevant for the actions.

**Figure 5: Other initiatives or documentation**



Are you aware of initiatives or documentation developed at EU, national or local level that could be relevant for this action?



Source: Public Feedback responses – Housing Partnership

Amongst others, the following initiatives or documentation were identified:

- 1) *European Housing Platform (developed by FEANTSA, Housing Europe, Friends of Europe, and Fondation Abbé Pierre)*
- 2) *“Policy Discussion Brief for the European Commission on housing in EU member states”*
- 3) *“UEPC position paper on state aid rules and social housing.”*

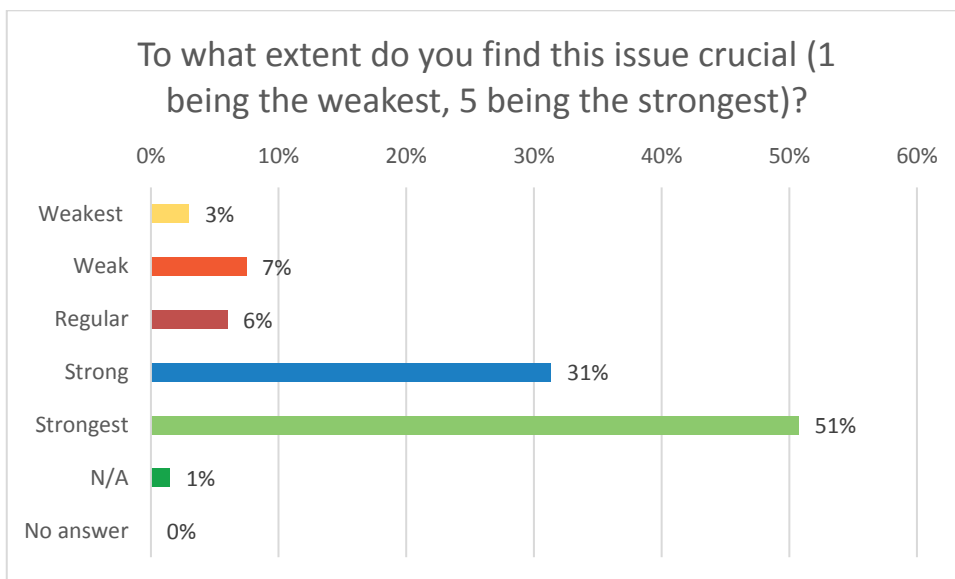
## **Action 2: Capacity building for application of state aid rules in affordable housing sector at a city level**

There is both a need for greater understanding in city authorities on the use of state funding support to improve the quality and affordability of housing for households in sustainable and liveable communities as well as for better recognition of the specific needs of cities to find solutions for their housing situations by EU institutions. This can concern both concrete projects (e.g. new housing, renewal of multi-residential buildings) as well as the general housing provision systems.

The Housing Partnerships is proposing to organise a capacity building workshop of up to 60 participants from cities, Member States and relevant EU institutions, provided that funding is made available by the Technical Secretariat. The workshop would take place in 2018 and shall gather both practitioners and legislators. This action will aim to provide more clarity and guidance on the use of state support in the housing sector in general and the multi story apartment buildings in particular. It will help to ensure progress towards the more effective application of EU regulations in the housing sector and develop knowledge on the specific barriers that cities face in the application and interpretation of the state aid rules.

As shown in the figure 6 below, 82% of respondents stated it was important to improve clarity and guidance on the use of state support in the housing sector with 51% finding this issue crucial.

**Figure 6: importance of issue**



Source: Public Feedback responses – Housing Partnership

Examples of supportive comments included:

*“The transfer of knowledge between practitioners and EU institutions is especially in policymaking crucial. Therefore this is a brilliant idea!”*

*“I believe that capacity building is very relevant.”*

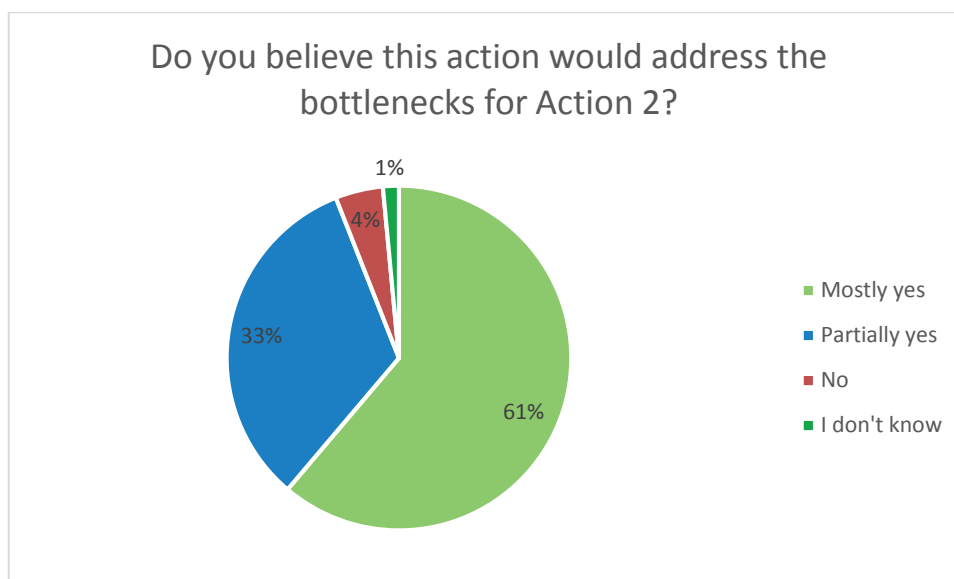
Comments which were less positive included:

*“Raising awareness and building capacity amongst stakeholders to boost investment in social and affordable housing would be useful. A focus on State Aid in this context would be relevant to some extent e.g. showing practically how flexibility is used in different contexts. However, the case that State Aid rules are the major barrier to investment, and the exclusive focus on this barrier, is not entirely convincing.”*

*“We agree that capacity building needs to be done at local-municipal level as these are the implementers. However we need to note that housing problems in EU Member state vary due to their historical backgrounds, institutional setups, economic opportunities and role of path of dependence in housing outcomes.”*

However as shown in figure 7, 94% of respondents believed that a capacity building workshop would address bottlenecks around clarity and guidance on the use of state support in the housing sector and only 4% believed it would not.

**Figure 7: Contribution of action to addressing bottleneck**



Source: Public Feedback responses – Housing Partnership

Examples of positive comments included:

*“Perfect! There is such a big lack of knowledge about the state aid and housing”.*

*“Examples of good practices and sharing experiences is very important and we can learn a lot from each other. Also direct contacts to other European organisations is strong for inspiration.”*

*“A workshop can be an excellent tool for the highest level of interactivity that allows and the possibility for participants to learn from the different cases.”*

Other comments did not necessarily disagree with the workshop but were wary about its scope included:

*“I am afraid that the interest will be limited and that the events will become more political than technical. There is a risk the debate gets dominated by countries with large social housing stocks in need of a policy/legal framework that is ill-adapted to the concerns/needs of countries with much smaller social housing stock.”*

*“We believe that the mechanisms controlling state support vary greatly between European states (and cities). Therefore, it would be difficult to organise a workshop that would truly benefit all participants equally.”*

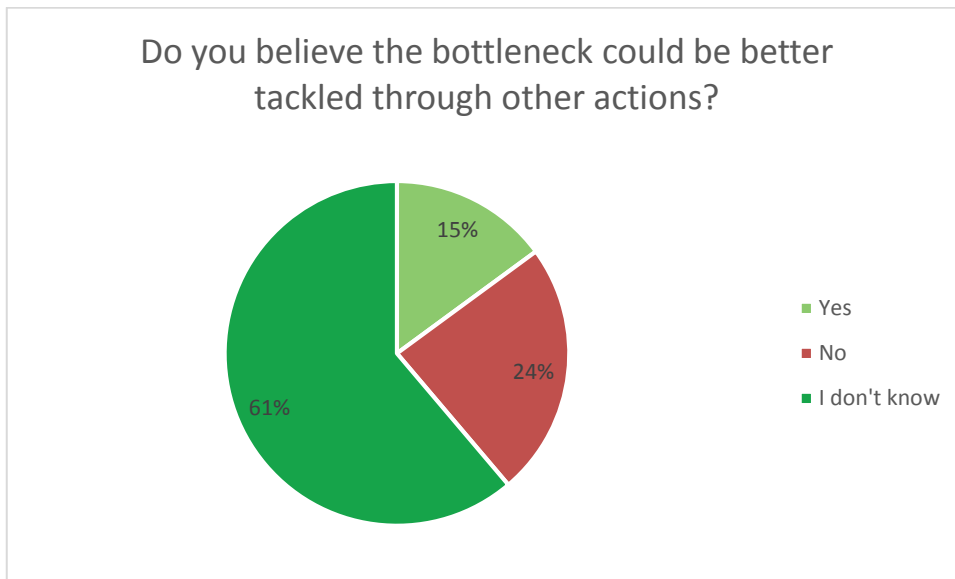
*“The scope of this action will depend on the range of participants involved (not just local authorities) and on the work carried out before the workshop by them.”*

*“The capacity building workshop would positively contribute to addressing bottlenecks in the provision of state aid support in the housing sector if it included private sector representatives, took into consideration the role of private for-profit developers in supply social and affordable housing to the European citizens and supported actions to promote the development of a level playing field between public and private undertakings in European housing markets.”*

*“I believe that one workshop may be relevant, although more efficient way how to change people mindsets and practices might be more regularly organised workshops.”*

Only 15% of respondents believe that the bottlenecks could be tackled better though other actions (figure 8)

**Figure 8: Use of other actions**



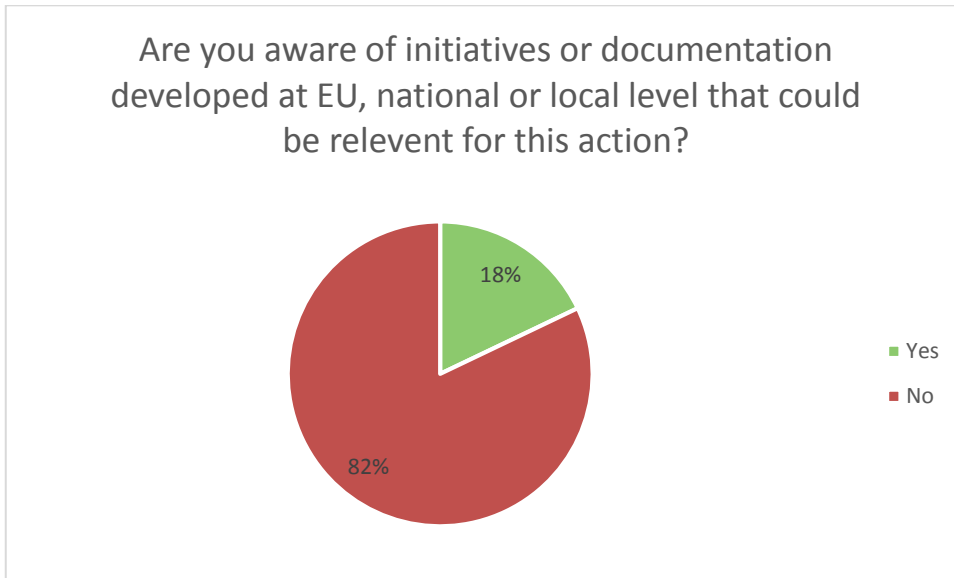
Source: Public Feedback responses – Housing Partnership

Examples of additional (or more comprehensive) actions included:

- 1) *“Study tours, exhibitions, films, interviews, conferences of best practice models and so on.”*
- 2) *“It would be worth considering different workshops for each type of participant (cities versus regional/metropolitan governments; private actors such as HLM or Housing Associations versus public actors; etc.) plus a concluding general workshop, a kind of plenary session.”*
- 3) *“...(it) would be more efficient and sustainable to build capacity of existing entities/networks that are more local and versed in the local context as the housing problems are so diverse among EU Member States and Cities. Therefore it would be more useful to build the capacity of the National Housing Coalitions that exist in the Member states. Usually these coalitions consist of representatives of all sectors NGOs, academia, private sector and public sector (municipalities).”*

As shown in figure 9, 82% of respondents were not aware of any alternative or similar initiatives or documentation relevant to this action. Only a very small number of respondents said there were other similar European, national and local level initiatives or documentation however specific details were not provided.

**Figure 9: Other initiatives or documentation**



Source: Public Feedback responses – Housing Partnership

**Action 3: Revision of the ‘Services of General Economic Interest’ (SGEI) decision with regard to the narrow target group of social housing**

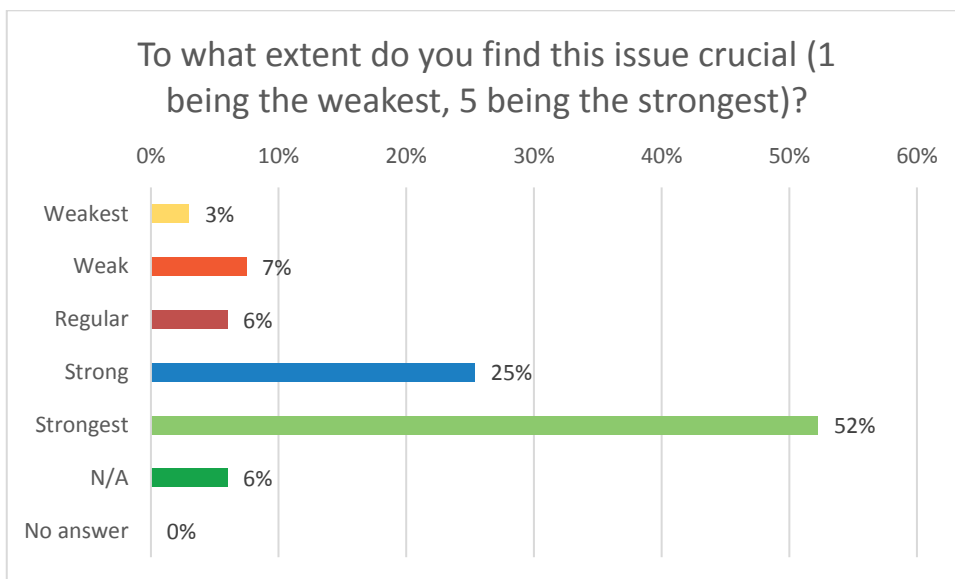
EU competition rules on state aid can be exempted if the performance of certain housing investments satisfy the “Services of General Economic Interest” (SGEI) criteria for exemption. The current definition of social housing as set out in the SGEI Decision (2012) generates legal uncertainty for investors, financiers and city and national authorities. It is questionable from a subsidiarity and proportionality perspective in the context of how Member States and local authorities support the provision of social housing.

The Housing Partnership is of the opinion that in the SGEI context, social housing must allow cities to pursue the aims of social mix and social cohesion and therefore should be accepted under the definition of social housing in the SGEI. The Partnership concluded that the future review of the SGEI 2012 Decision should take this into account and delete the mention of social housing as limited to “disadvantaged citizens or socially less advantaged groups”.

The graph below identifies that over 75% of respondents believe that revision of the ‘Services of General Economic Interest’ (SGEI) decision with regard to the narrow target group of social housing is an important issue.

**Figure 10: Importance of issue**





Source: Public Feedback responses – Housing Partnership

Examples of supportive comments included:

*“Subsidised housing must be accessible for broad levels of the population today and also in the future. We disapprove of the approach to concentrate exclusively on low-income groups”*

*“This is the most essential measure of all: It ensures the wide access to social housing in Europe, enhances social mix, prevents from poverty and homelessness. It’s an important measure for livable cities.”*

*“It is crucial to remove this uncertainty, particularly nowadays considering the current financial situation of many local, regional and national governments, which has directly affected the public funding available for housing policy interventions.”*

*“We agree that the current definition of social housing as set out in the SGEI Decision (2012) generates legal uncertainty for many stakeholders. We support the social housing definition of OECD as ‘residential rental accommodation provided at submarket prices and allocated according to specific rules rather than according to market mechanisms’”*

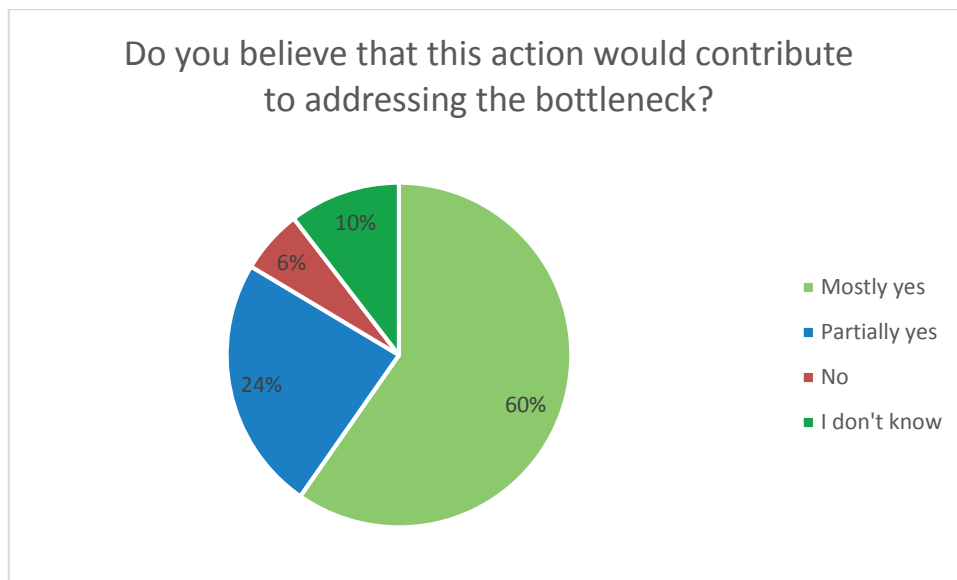
There were very few negative comments; other comments generally supported the Partnership’s focus on this issue while highlighting some qualifications or limitations:

*“In Finland the state negotiates the SGEI criteria for the cities. In Helsinki we have been able to build and control the housing market and build affordable housing despite the regulatory measures of the SGEI system.”*

*“State aid rules have worked very well so far. Social housing is an economic activity and must abide by state aid rules. Moreover, the need for specific targets is vital in closed systems - where private for-profit undertakings are prevented from supplying social housing to the public - to avoid unfair competition from continuing to spread as it is currently the case in France and Belgium. The current SGEI definition does not represent the real problem compared to lack of level playing field in closed social housing systems and the doubtful use of state aid rules to finance projects outside the scope of social housing. State aid must be equally available to all market actors involved and this irrespective of their public, semi-public or private status.”*

As shown in the graph below, 84% of respondents believe that the revision of the SGEI decision with regard to the narrow target group of social housing would allow cities to pursue higher levels of social cohesion and interaction.

**Figure 11: Contribution of action to addressing bottleneck**



Source: Public Feedback responses – Housing Partnership

Examples of supportive comments included:

*“Goals like social mix and social cohesion could be considered additionally.”*

*“It should be made clear that affordable housing for (lower) middle class income groups is not dealt with within the SGEI-context. These groups are already the losers of the global economy, and will be further losers when their housing situation is not provided. This may harm society as a whole. Moreover, in practice these groups compete with the lowest classes for the same (scarce) houses.”*



*So, state support is needed to provide more housing for the lower middle classes as well. This will relieve the pressure at the real social housing sector.”*

*“Indeed, the definition of social housing should be larger than “disadvantaged citizens or socially less advantaged groups” in order to cover other segments of the population who, although they are not in situations of exclusion, also need support to have access to housing.”*

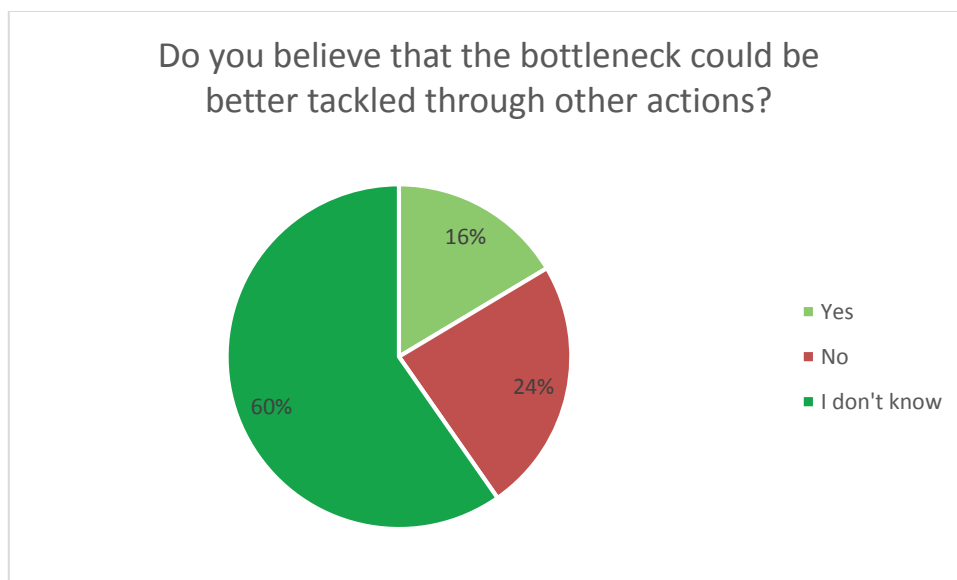
*“Considering that in many European cities middle-income households struggle to pay their housing costs both in rented and home ownership market, a broader and more flexible definition of “social housing” and “housing policy target group” are needed.”*

One comment represented contrary view:

*“Social housing is an economic activity as stated by the ECJ and well accepted by the European Commission. In so-called closed systems, state aid rules represent the only solution to the lack of a level playing field between public and private undertakings as they allow state support only to the specific target of disadvantaged citizens.”*

Only 16% of respondents believed that other actions were more relevant to this particular bottleneck (figure 12).

**Figure 12: Use of other actions**



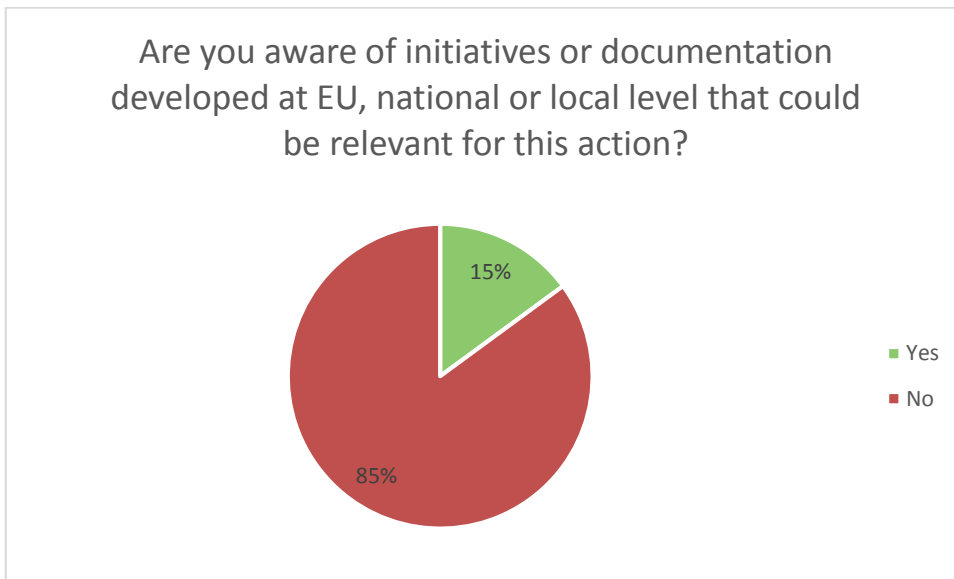
Source: Public Feedback responses – Housing Partnership

Examples of additional actions included:

- 1) *“...a General Framework regarding Social and Affordable Housing that could bring conceptual clearness, some common criteria to access social housing and a more integrated European approach to these matters.”*
- 2) *“I believe additional workshop or some kind of in person capacity building activities would be very effective.”*

As shown below, 85% of interviewees advised that they were not aware of any initiatives or documents that could be relevant.

**Figure 13: Other initiatives or documentation**

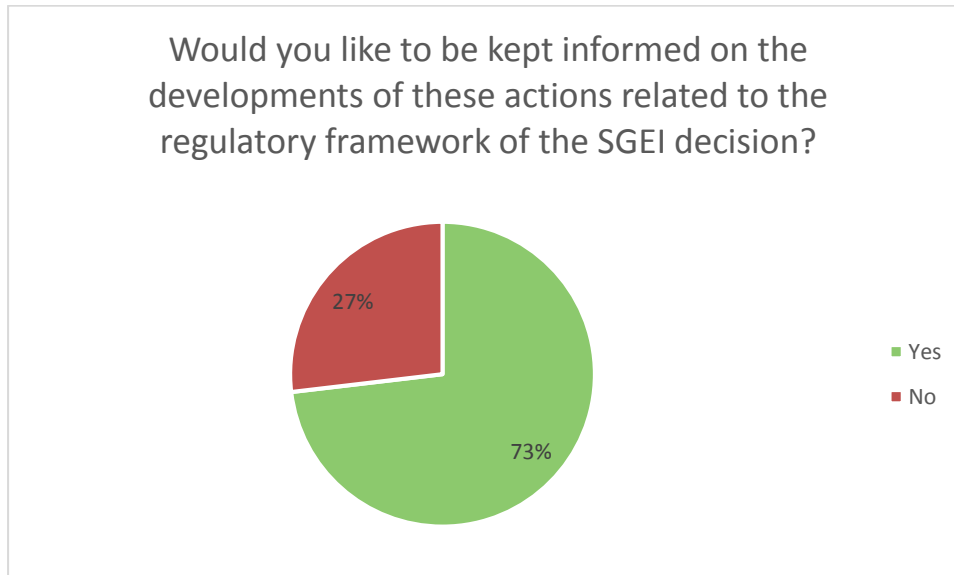


Source: Public Feedback responses – Housing Partnership

#### Interest in developments relating to theme

Overall, 73% of respondents would like to be kept informed of developments relating to this theme.

**Figure 14: Interest in developments**



### 4.3 Theme 2: Better knowledge

There is an increased need for social and other affordable housing options in Europe, especially in urban areas that are likely to suffer even more from a lack of affordable housing in the future. The

level of social and affordable housing across Europe has been in general decline over the last 30 years as the role of the private sector has increased and the global financial crisis has led to a fall in public expenditure linked to housing. Despite affordable housing being a key issue across many of Europe's cities and despite there being a range of good and bad practice linked to tackling this challenge, there is a need to develop better knowledge and 'what works and why' in the provision of affordable housing, also in its governance context.

### Action 1: Affordable Housing Good Practice Database

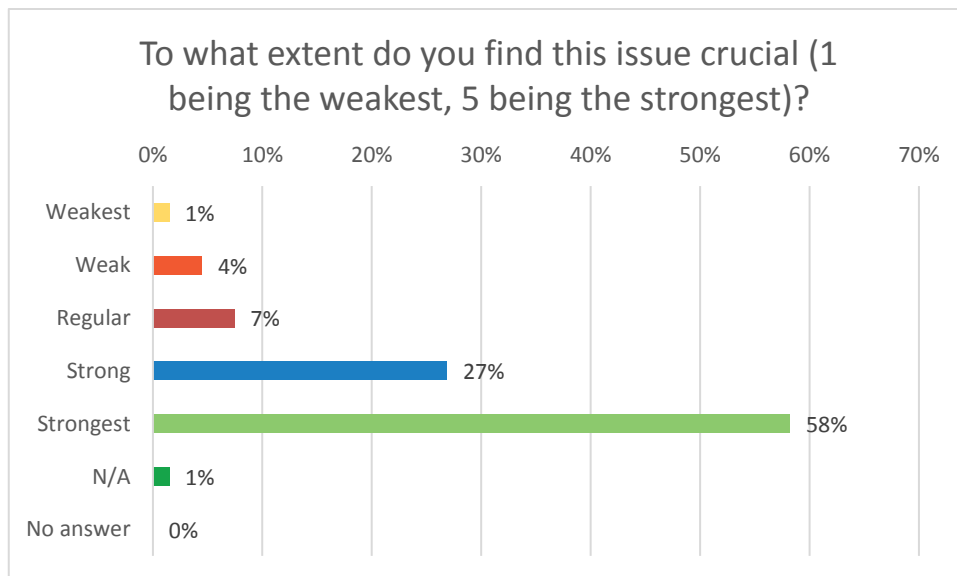
Despite affordable housing being a key issue across many of Europe's cities and despite there being a range of good and bad practice linked to tackling this challenge, there is no definitive and single place that city practitioners and/or housing legislators can go to in order to learn about 'what works and why' around affordable housing. The Housing Partnership contends that this knowledge gap acts as a bottleneck to investment, with housing practitioners and/or legislators not currently having a single source to access in order to learn and swap ideas on this key urban issue.

The proposed action will design and implement an online database that gathers and presents best practices attached to social and affordable housing across Europe with a particular focus on the governance systems. The database will aim to get 30 representative examples from across the EU, covering different housing traditions and along a set of categories. At a time when more investment is needed in the affordable housing sector, the database will provide knowledge at national, regional and city level so that a more definitive understanding on solutions can be developed.

#### 4.3.1 Importance of the issue according to respondents

The chart below shows that 85% of respondents found knowledge gaps on best practices for affordable housing to be an important issue to address.

Figure 15: Importance of the issue



Source: Public Feedback responses – Housing Partnership

Examples of supportive comments included:

*"We do not profit enough from lessons learned elsewhere, nor from inspiring projects"*

*“Considering the many different approaches and results in Europe, it is very important to have the possibility to make reference to a sort of general map about “what works and why (under which conditions)” so to guide decisions in different places and contexts”*

*“Knowledge management and knowledge platforms are indispensable in the subject matter.”*

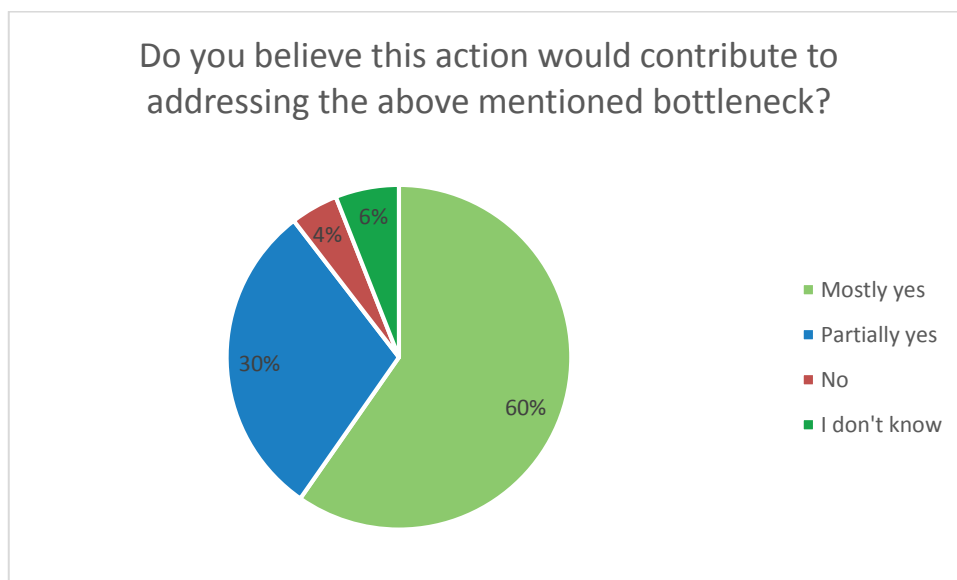
The following shows an example of a less supportive comment:

*“Identification of interesting best/worst practices is very important. There is too little creativity amongst policy makers and housing providers to provide affordable housing. A database can help to address this lack of innovation. The question is whether the Housing Partnership with its limited membership is the best equipped to develop such a database.”*

#### 4.3.2 Contribution of the action to addressing the identified bottlenecks

As shown in figure 16, 90% of respondents believed that a good practice database would be important in helping to address the particular bottlenecks identified, specifically knowledge gaps on good and bad practice solutions.

**Figure 16: Contribution of action to addressing bottlenecks**



Source: Public Feedback responses – Housing Partnership

The following comment illustrates the supportive responses:

*“The problem is that there is no place and time to discuss with actors at all scales on how social housing should be and how it is organised and to share great examples of social housing projects and solutions for future problems.”*

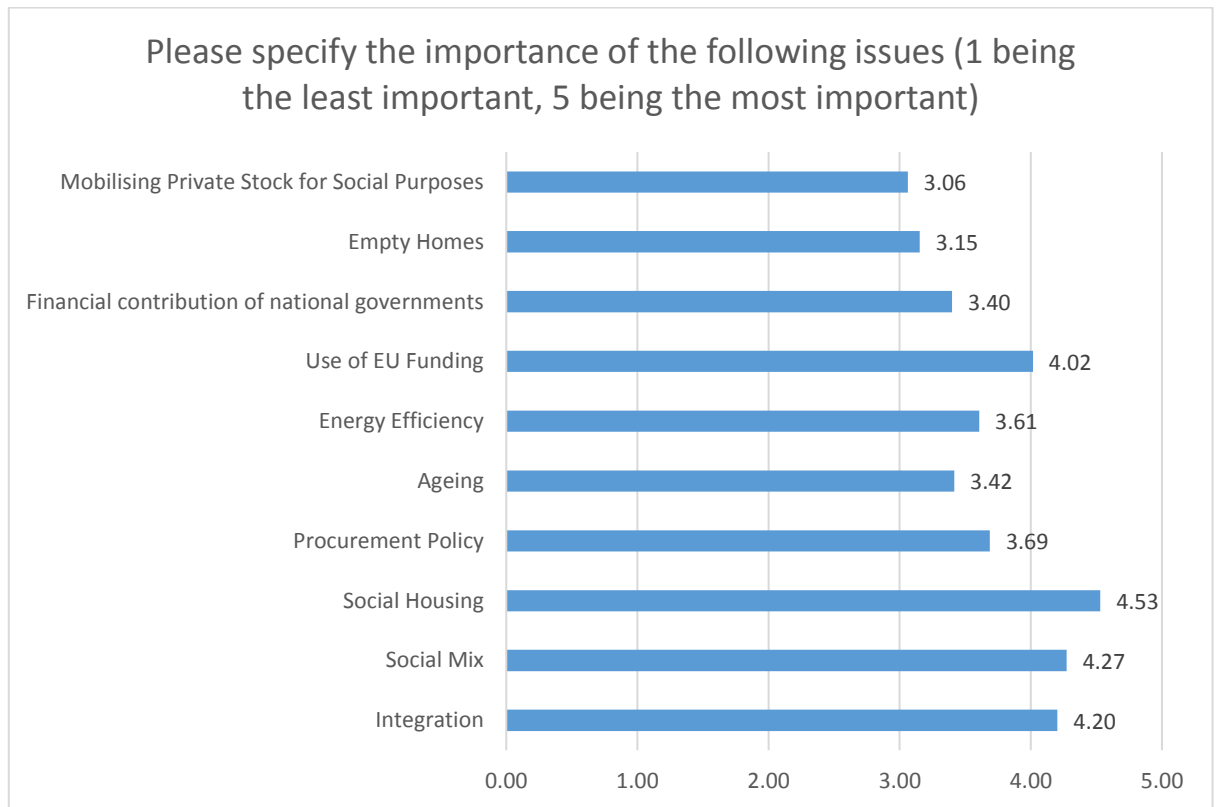
A few responses focused on the limitations of the database:

*“I strongly welcome the focus on “what works” and good practice. However, I think there is a need to go beyond a database and engage with a broader community of practice to identify, debate, develop, promote, test etc. innovative housing solutions.”*

“Too modest. There are many more than 30 interesting practices. I also don't agree with the focus on governance (of social housing). There are many more issues (vacancy, socialisation of private rent, financing, affordable land, cheap construction, innovation in tenure, co-housing, ...) which are not captured by governance. It is very important to also look at practices to deliver affordable housing beyond the social housing sector (especially because of the limited size of the social housing sector in many EU member states).”

Figure 17 shows the level of importance respondents attached to various issues that could be potentially addressed in the database. The results are based on an average importance rating. Most of the proposed topics to be included in the database were positively received with the lowest score being 3.06. The most important topics were considered to be ‘social housing’, ‘social mix’ and ‘integration’.

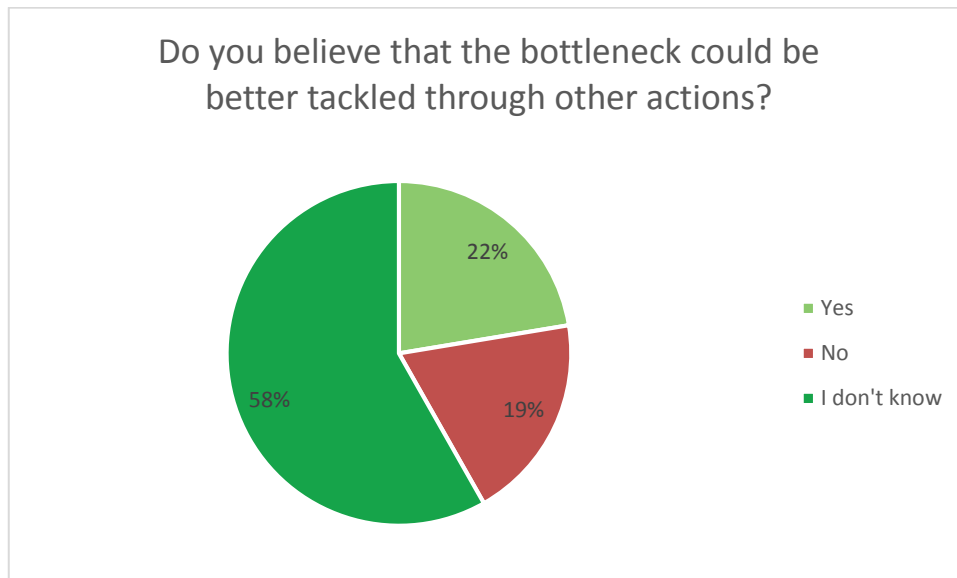
**Figure 17: Importance of issues to address in the guidance**



Source: Public Feedback responses – Housing Partnership

Only 22% of respondents believed that the bottlenecks identified could be better tackled through other actions (figure 18).

**Figure 18: Use of other actions**



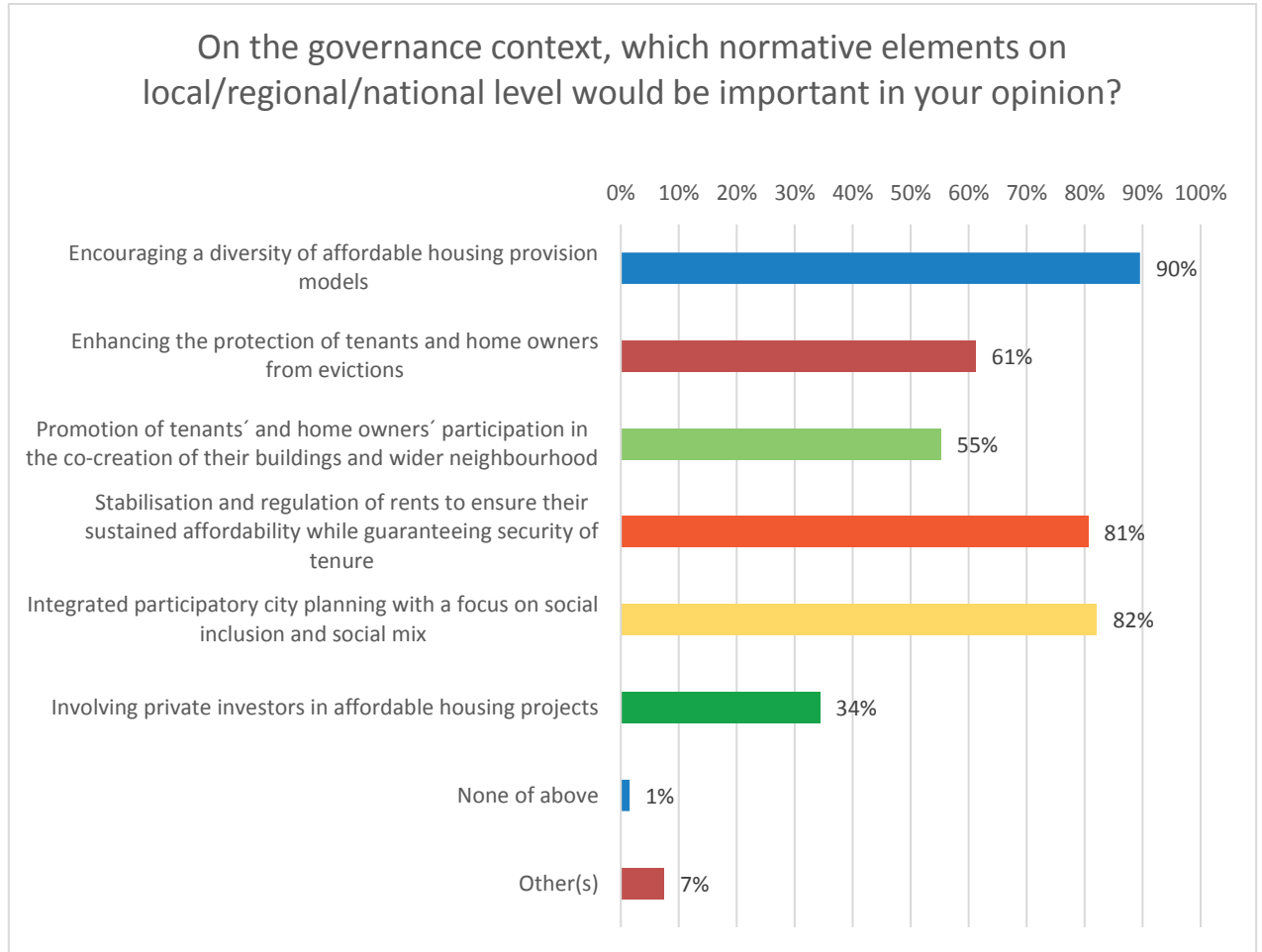
Source: Public Feedback responses – Housing Partnership

The following examples were given:

- 1) *“Funding European projects aimed at facilitating such exchanges of practices and updating the database would be necessary if we want to make it as useful as possible in the longer term.”*
- 2) *“I believe in a more active way of approaching housing practitioners and/of legislators. I think that local actors should be approached on a more local/personal/low-threshold way.”*

The graph below shows that most of the normative elements listed in the Public Feedback questionnaire were considered to be important for inclusion in the database. The most important component was considered to be “encouraging a diversity of affordable housing provision models” as 90% of respondents identified this as an important issue. Next were “integrated participatory city planning with a focus on social inclusion and social mix” (82%) and “stabilisation and regulation of rents to ensure their sustained affordability while guaranteeing security of tenure” (81%).

**Figure 19: Importance of normative elements (governance)**

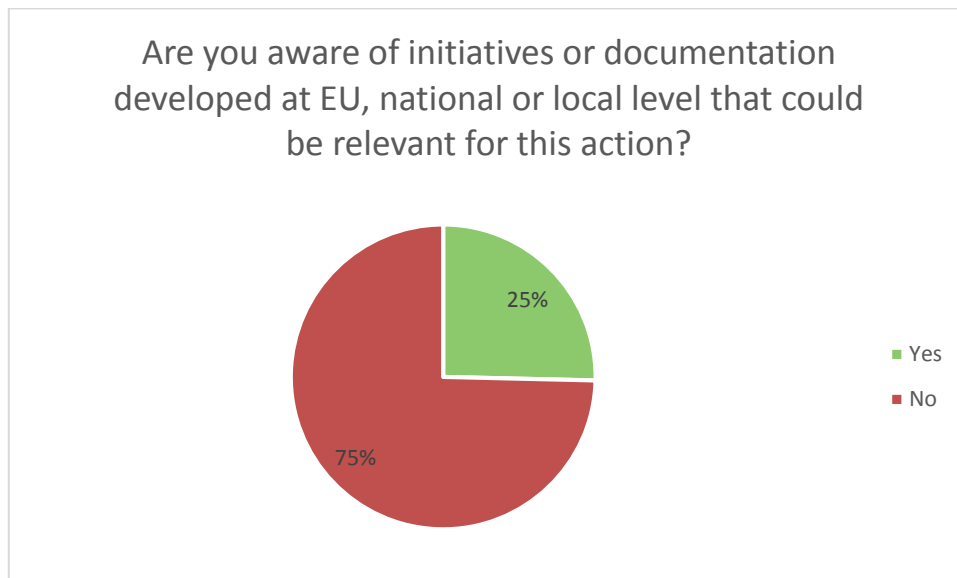


Source: Public Feedback responses – Housing Partnership

Only 25% of respondents are aware of documentation or initiatives that would be relevant for this action (figure 20).



**Figure 20: Other initiatives or documentation**



Source: Public Feedback responses – Housing Partnership

Only one specific initiative was identified:

1) “The European Housing Solutions Platform - it is under construction but will consist of app 100 individual experts (wide variety of backgrounds - architects, academics, planners, policy makers, NGOs, ...) from accross the EU. They will cover a variety of themes related to affordable housing. The platform might be able to assist the Partnership in further developing the database.

## Action 2: Provide policy guidance for supply of social and affordable housing in Europe

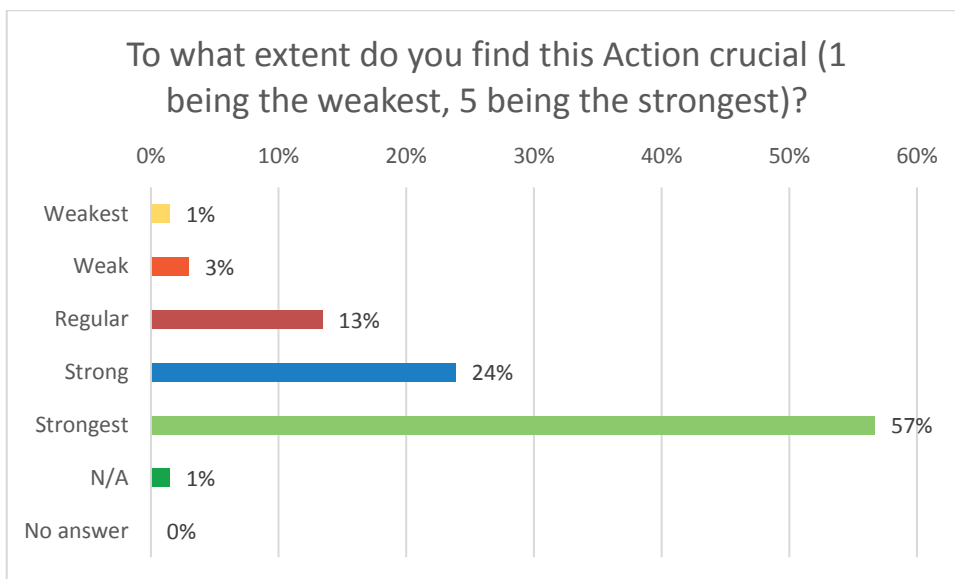
The knowledge gap on ‘what works and why’ with respect to affordable housing acts as a bottleneck to innovation, with housing practitioners and legislators not currently having a single source to access information on tools that could include templates, models, datasets and policy documents. As many cities, regions and countries are currently facing challenges regarding the formulation of affordable housing policies, guidance and knowledge exchange is necessary.

The objective is to develop a Housing Policy Toolkit (building on the best practices database described in the previous action) that provides examples and tools of the ways that social and affordable housing can be provided in Europe’s urban areas. The toolkit will not simply give information on good practice on affordable housing but provide tools that could include templates, models, datasets and policy documents that housing practitioners and legislators can actually use in their work and easily interpret into their own setting and context.

The chart below shows that 81% of respondents believed the need for a single source to access information on tools that could include templates, models, datasets and policy documents to be an important issue.

**Figure 21: Importance of the issue**

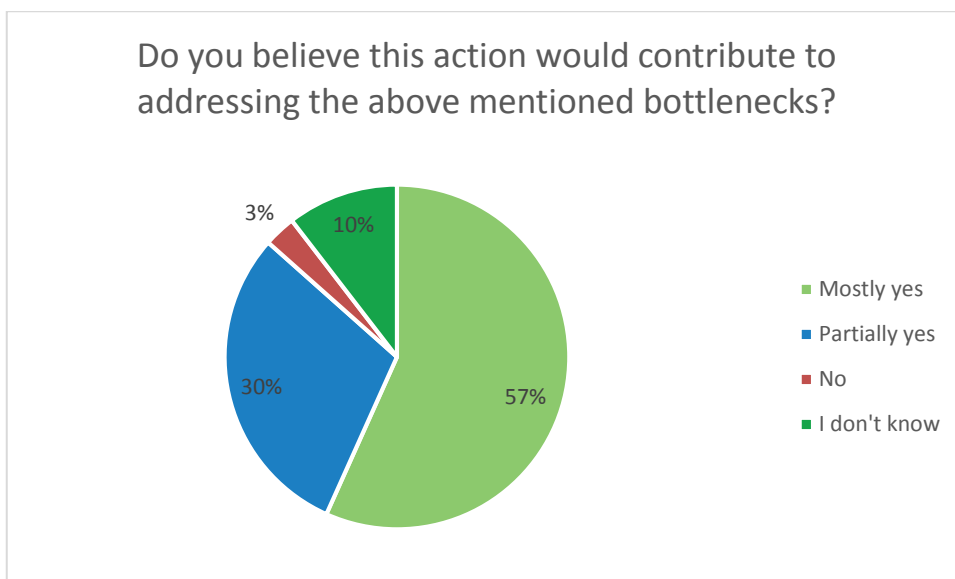




Source: Public Feedback responses – Housing Partnership

Only 3% of respondents did not think that the toolkit would be beneficial in addressing bottlenecks, whilst 87% agreed that it would help.

**Figure 22: Contribution of the action to addressing bottlenecks**



Source: Public Feedback responses – Housing Partnership

Positive comments included:

*“..it would be very important for the Housing Partnership and European Authorities to create a General Framework regarding Social and Affordable Housing that could bring conceptual clearness, common criteria in regarding to access and exclusion to social housing and a more integrated European approach. This will bring a great added value to national policies, mainly on social housing*

management models - conservation, tenancy, rent values, etc - making for a fairer and egalitarian system”.

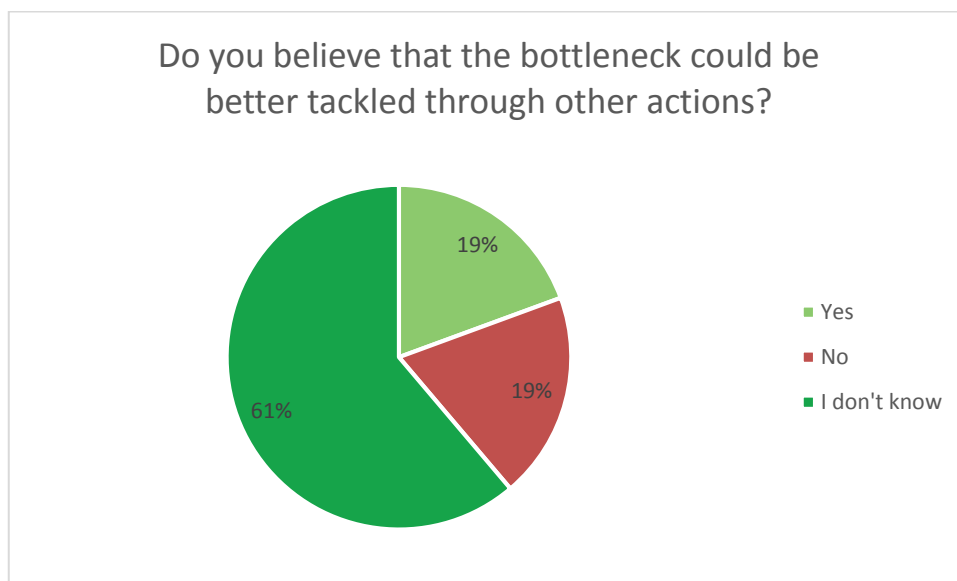
“Having it available in a practical toolkit would enhance the rapid diffusion of good and working ideas.”

A few responses focused on the limitations of the toolkit:

“Addressing the knowledge gap outlined is essential. However, there is a risk that European guidance will struggle to address the diversity of local and national situations. A focus on exchange & practice, with a bottom-up approach would be critical.”

The majority of participants (61%) did not know if the bottlenecks could be tackled better through other actions. Only 19% of participants thought the bottlenecks could be better tackled through other actions (figure 23).

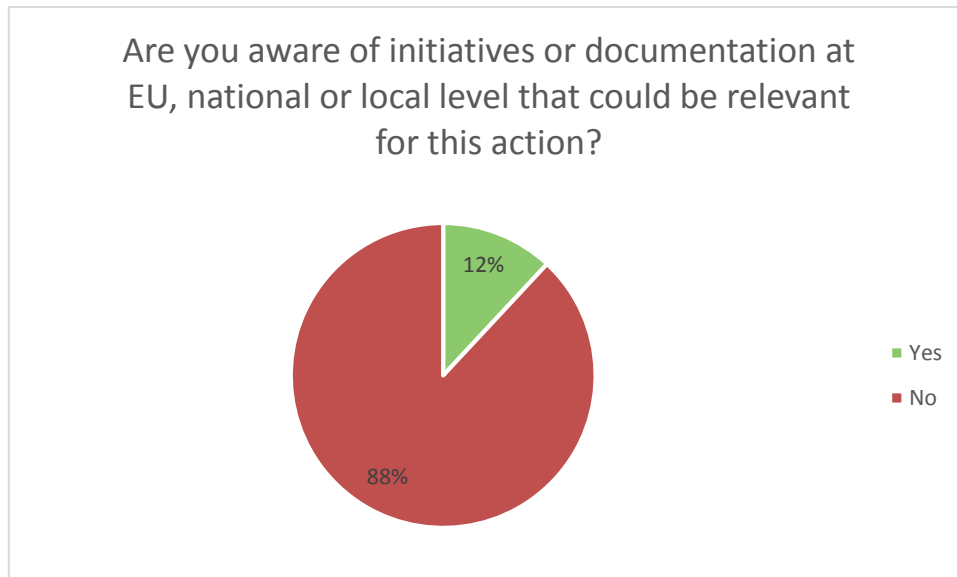
**Figure 23: Use of other actions**



Source: Public Feedback responses – Housing Partnership

Only 12% of respondents were aware of initiatives or documentation that would be better for providing social and affordable housing in Europe although no specific examples were provided (figure 24).

**Figure 24: Other initiatives or documentation**



#### 4.4 Concluding Remarks

This paper has reported on the results of a Public Feedback exercise which is part of a process to evaluate the actions and recommendations developed by the Partnership on Housing. Through the Public Feedback (which ran from 17<sup>th</sup> July 2017 until 25<sup>th</sup> August 2017) stakeholders were invited to provide views on some initial draft actions proposed by the Partnership. The total number of responses submitted was 67 which was higher than the average for the urban partnerships.

Overall, the responses suggest that there is general agreement and support for the themes and actions emerging from the Partnership.

The responses show general support for the Partnership to prioritise clarity and guidance on the issue of state aid and affordable housing. There is strong support for the notion that clarity and guidance is required on how the definition of social housing within the context of the Service of General Economic Interest (SGEI) exemption for state aid should be applied to allow cities to pursue the aims of social mix and social cohesion. There was also general support for the action to revise the definition of social housing in the SGEI regulation.

Only a few of the respondents believed that the definition of social housing in the state aid regulations was not an issue in their own cities. In a small minority of cases respondents believed that the state aid issue was relatively minor in the context of wider barriers facing cities in addressing affordable housing shortages such as funding and supportive national policies.

There is also general support to develop knowledge and information on good practice solutions to issues of affordability in the housing market. The majority of respondents believed that the development of a database on best practices and a policy toolkit would be important to addressing knowledge gaps in this area.

The responses highlighted a particular challenge in developing guidance materials, namely the need to address the diversity of local and national contexts.