

DEFINITIONS OF AND ACCESS TO SOCIAL AND AFFORDABLE HOUSING IN EUROPE

HOUSING EUROPE REPORT FOR THE
EUROPEAN INVESTMENT BANK
(OCTOBER 2020)



Background to the report

Housing Europe was commissioned by the EIB in early 2020 to provide a brief overview of two key issues:

- 1) How is social and affordable housing defined, or otherwise broadly recognised in the EU
- 2) Who has the right to access these dwellings

Housing Europe, in coordination with the EIB, drafted a questionnaire that was sent to its network of social and affordable housing providers with the aim of providing a clear and concise compendium of information related to these two issues, as well as links to relevant sources where any changes to situation that pertained in Q2 2020 (time of survey) could be found. This latter point was relevant, as many countries apply income thresholds for access to supported housing. These typically change on an annual basis, often linked to changes in the CPI index or other measures of the cost of living.

A draft version of the report was submitted to the EIB in July 2020. This final version was submitted and signed off on by both Housing Europe and the EIB in October 2020.

The report was written, coordinated and edited by Mr Dara TURNBULL, Research Coordinator at Housing Europe.

Defining social and affordable housing

One of the main issues in writing this study was in relation to how to best divide housing solutions up into 'social' and 'affordable', as requested by the EIB. While these terms are generally understood by experts working in the field of housing provision, there is no clearly defined or agreed definition of either to which we can defer.

Indeed, both terms represent an Anglocentric view of housing systems, in which any housing provided at a reduced or controlled price must fit into one of these two broad categories. This is reinforced in academic research and expert reports which discuss these housing options, even when the authors are making reference to non-English speaking countries in which terms that directly translate or parallel 'social' or 'affordable' are not used.

In the questionnaire that was sent to Housing Europe members, respondents were asked to provide information on 'social' and 'affordable' housing as two distinct categories of housing, without being provided definitions of these terms by Housing Europe. Thus, this report defers to the judgement of the respondents, who are best placed to judge the usage of the terms in their own national contexts.

In reviewing the responses, we can see that, broadly speaking, 'social' and 'affordable' were delineated by respondents along the following lines;

Social Housing – is usually taken to mean rental accommodation provided at rents which are below market rates; rented out by providers whose allocation criteria or operating structures are regulated by public authorities and with some form of public support (e.g. loans at favourable rates, grants, public guarantees).

Affordable Housing - is usually taken as housing provided either for rent or for sale where the price paid by the tenant or purchaser is controlled or regulated such that it is below the price that would be attained were the dwelling to be offered on the 'open market'. In differentiating this category from social housing we can already see that any housing which is built for sale that will be looked at in the report must by default be considered to be 'affordable'. In terms of differentiating between 'social' rental and 'affordable' rental, the latter is generally taken to be dwellings in which the rent is set either at the cost of delivery (i.e. cost-rental) or at some level which is intentionally higher than the social rent, but still below the market price.

Of course, the possibility for some 'grey' area between these two categorisations exists, though generally speaking examples in this report do seem to fit relatively neatly under one of the two possible headings. It should also be noted that in the current context of increased housing market segregation and inter-generational inequality, Housing Europe's members provide a number of different housing solutions to satisfy the diverse needs and circumstances of households. All of this housing is needed in order to help people to satisfy their housing needs or compensate for market failures and thus, while it can be sometimes important to make the distinction, both social and affordable housing are designed to meet the same goal. The difference is in the circumstances of households, not the need.

NOTE: It cannot be stressed enough that the above broad delineations between 'social' and 'affordable' should not be taken to be the official definition of these housing types of Housing Europe. They are simply used for this report, and this report alone, for the purpose of better explaining the writing process of the author. They should never be attributed or linked to Housing Europe in any subsequent documents that the EIB or third-parties might produce.

Social Housing

Country or Region	Eligibility Criteria	- <i>decides on criteria</i>	How social housing is referred to	- <i>definition</i>	Right-to-Buy / Tenant Purchase	Useful Links
Austria	<ul style="list-style-type: none"> - Income thresholds (<i>depends on each region or city government</i>) - Residence (<i>are legally full-time resident in Austria. Some regions or cities will also apply criteria based on minimum time spent living in their allocation area; for example, Vienna requires five years of residence in order to apply</i>) - Housing providers manage their own waiting lists, applying criteria with various 'weightings' (<i>e.g. health, family circumstances, homelessness</i>) – this is easily done, as the providers are essentially an arm of the municipal government 	<ul style="list-style-type: none"> - National Govt - Local Govt 	Gemeindewohnung	<ul style="list-style-type: none"> No formal definition. - Gemeindewohnung is housing provided by municipalities and equates to around 7% of the national housing stock. While it can charge cost-rents, in practice it often offers rents below the maximum allowed for by law. In this respect, while it is not strictly 'social housing' in the traditional sense of the term, it does cater for more homeless and very low income households than the 'affordable' limited-profit sector - Gemeindewohnung is significant in Vienna, but constitutes a relatively small part of the housing stock elsewhere in Austria 	Social housing can be sold, but there is no automatic right to buy	<ul style="list-style-type: none"> Overview of 'Gemeindewohnung' Overview of 'Gemeindewohnung' in Vienna
Belgium (Brussels)	<ul style="list-style-type: none"> - Income threshold (<i>in 2020: net income below €23,283.17-29,565.98 depending on the number of wage earners; +€2,217.44 per dependent child and +€4,434.89 per dependent child with special needs</i>) - Cannot be a property owner - Must be legally resident in the country 	Brussels Regional Government	Logement social / sociale huisvesting	A housing unit rented by a local housing association to a low income household and of which the rent is calculated based on regulations set down by the regional government	No	<ul style="list-style-type: none"> Overview of renting social housing in Brussels Conditions to be met for access Overview of attribution decisions
Belgium (Flanders)	<ul style="list-style-type: none"> - Income threshold (<i>this varies depending on the exact composition of the household (see); for example, a single person in 2020 had a limit of €25,317</i>) - Cannot be a property owner - Must be legally resident in the country 	Flanders Regional Government	Sociale huisvesting	Rental housing provided by registered providers at a legally defined rent to households meeting legally defined access criteria	Units can be sold, but this is at the complete discretion of the social provider	<ul style="list-style-type: none"> The Association of Flemish Housing Companies (VvH) The Flemish Society for Social Housing Legal basis for social housing in Flanders Annual Flemish social housing reports Legal basis for social housing in Wallonia
Belgium (Wallonia)	<ul style="list-style-type: none"> - Income (<i>in 2020: €45,100 for a one adult household; €54,500 for multiple adult household; +€2,700 per child</i>) - Cannot be a property owner - Family situation (<i>priority given to vulnerable social groups such as those with special needs or those experiencing family collapse</i>) 	Wallonia Regional Government	Logement d'utilité publique / logement public	Rental housing provided to households in line with the criteria set down in law by the Walloon Govt. (<i>i.e. income threshold, property ownership, family situation</i>)	<ul style="list-style-type: none"> Units can be sold at the discretion of providers - Cannot already own a property - No income limits - Must sell home to another social tenant if selling, or else face financial penalties 	<ul style="list-style-type: none"> Overview of financing and other supports for social housing Sale of social housing in Wallonia Renting social housing in Wallonia
Cyprus	N/A	N/A	Κοινωνική Στέγη	<ul style="list-style-type: none"> N/A - Social housing does not currently exist in Cyprus, though there are some 'affordable' options 	N/A	Cyprus Land Development Agency – largest promoter of non-market housing
Czech Republic	<ul style="list-style-type: none"> - income thresholds (<i>for each municipality to decide upon</i>) - disability or health issues (<i>for each municipality to take on board an implement in their allocation policies</i>) - Family circumstances (<i>for each municipality to take on board an implement in their allocation policies</i>) 	<ul style="list-style-type: none"> - National Govt - Municipal Govt 	pronajímatel - který je příjemcem podpory	<ul style="list-style-type: none"> No current national definition - Social housing (referred to more commonly as municipal housing) broadly refers to rental housing which has received state grants, loans or subsidies for its construction. Its administration is highly decentralised and is often linked to the provision of social services by municipal authorities 	No	<ul style="list-style-type: none"> Czech Ministry of Regional Development – main ministry responsible for social housing Summary of housing policy in Czechia

Denmark	- Urgency of need	Municipal Govt in consultation with the Housing Provider	Almene boliger - Almene familieboliger (<i>family housing</i>) - Ungdoms- og studieboliger (<i>youth and student housing</i>) - Ældrebolig (<i>elderly housing</i>) - Enkeltværelser (<i>single room housing</i>)	Officially, 'social housing' is not recognisable in Denmark, as non-market housing is provided on a cost-rental, 'affordable' basis. However, municipalities reserve the right to decide on the allocation of a certain percentage (usually 10%-25%) of the cost-rental units. These are typically allocated based on urgency of need, with rents covered wholly or in-part by the social welfare system. Thus, this system fills the 'gap' left by not having a strictly defined 'social housing' segment	N/A	
Estonia	- Criteria for access are set by each Municipality, which have a high level of autonomy in relation to the provision and regulation of social housing Typical criteria include: - Don't already have access to adequate housing - Resident in the municipality - Family situation (<i>priority for being forced out of current home, elderly people, those with disabilities, etc.</i>) - Occupation (<i>priority can be given for essential 'front line' workers such as nurses or teachers in some municipalities</i>)	Municipal Govt	Munitsipaalaluruumid / Sotsiaaaluruumid	No official definition - Rented housing provided by municipalities to targeted social groups - rents are set by each municipality and are based on the cost of construction and maintenance	No - However, Municipalities retain the right to periodically sell-off part of their stock - Housing financed with assistance from KredEx cannot change ownership within the first 20 years after completion of the building	KredEx – The Estonian state investment fund: Provide funds for municipal housing Example of Municipal Housing Eligibility Criteria – Tallinn Example of Municipal Eligibility Criteria – Tartu Estonian Ministry for Social Affairs – oversees social housing
Finland	In theory, all are eligible to apply for social housing, however preference is given based on: - Urgency of need (<i>priority given to homeless people and others in desperate situations</i>) - Wealth (<i>taken into consideration, but no legal 'limits' exist. In Helsinki, high demand has led to the introduction of clearly defined wealth limits. In 2020, the limit was from €95k-€191k depending on household size</i>)	- National Govt - Housing Finance and Development Centre of Finland (ARA) - City of Helsinki	Kohtuuhintainen asuminen	Housing which is constructed using state financing, loan guarantees and/or tax reliefs which must be rented out to legally defined social tenants during the repayment period of the state loan (<i>after which the property can be rented out at market prices</i>)	No - <i>Does not exist for social rental tenants, exists in limited form for affordable housing</i>	Overview of ARA housing interventions Detailed information on housing financing from ARA Wealth limits in Helsinki Directory of municipal social housing providers in Finland Overview of rents by region and sector
France	- Income limit (<i>can vary a lot depending on the composition of the household and the location of the social housing unit; for example, a couple with no dependents can have an income as high as €46,640 when all variables are considered : see</i>) - Legal full-time resident - Family, health, personal circumstances are considered	- National Govt' - Local Govt'	Logement social / Habitation à loyer modéré (HLM)	Housing built with public financial assistance (tax benefits, public subsidies or preferential loans) in order to provide accommodation for those on low and modest incomes	Social housing units can be sold, but this is the exclusive discretion of the providers, often in consultation with local government	Overview of accessing social housing Eligibility criteria Legal code regulating and defining social housing

Germany	<ul style="list-style-type: none"> - Income threshold (approximately €18,000 gross household income for a two adult household; increases for dependents (i.e. children); differs from region to region) - Must have been legally resident for at least one year 	<ul style="list-style-type: none"> - Federal Govt - Regional Govt 	Sozialer Wohnungsbau	<p>Rental housing built using state funds, which must be made available to low-income households in line with regional limits and rented out at a price in accordance with clearly defined rules at a below market rate during a 'lock-in' period (i.e. the amount of time it takes the developer to repay the state loan; typically 15-30 years)</p> <p>- Social housing tenants may also often be in receipt of state housing allowances to help meet their rent</p>	<p>No</p> <ul style="list-style-type: none"> - Social housing in German is social (<i>rented to low-income households at a defined rent</i>) for as long as it takes for state loans used in their construction to be repaid, after which it ceases to be required to have a social function 	<p>GdW overview of social housing in Germany</p> <p>Most recent GdW annual report and data compendium</p> <p>Overview of income limits and rent setting in social housing in Germany (Hartz IV system)</p>
Ireland	<ul style="list-style-type: none"> - Income (€25k-35k net income for a single person, with the limit depending on location; €26,250-€42,000 net income for households with more than one person, based on location, number of adults and number of children) - Cannot have access to alternative accommodation - Need (priority is given to those in urgent need, i.e. homeless, illness or disability, current home unfit for habitation) - Must have long-term right to remain in the state 	<ul style="list-style-type: none"> - National Govt' - Local Govt' - Housing Providers 	Social housing	Housing which is provided to those who have been deemed eligible to receive it in accordance with national legislation by either a Local Authority or an Approved Housing Body	<p>Yes</p> <ul style="list-style-type: none"> - Only applies to Local Authority tenants - Must be in receipt of social housing for at least one year - Annual income of above €15k - Cannot have previously purchased a home - Not all social house units can be purchased (<i>some homes considered too 'strategic' to sell</i>) 	<p>Guide to applying for social housing</p> <p>Income limits</p> <p>Irish Housing Agency – provide data, research documents and guidelines on social and affordable housing</p>
Italy	<ul style="list-style-type: none"> - Must be legal resident in Italy - Not already own a property - Income limit (<i>varies from region to region and is based on household composition</i>) - Family circumstances (<i>priority can be given, for example: health issues, people over 65 years old, unable to work, more than three children, etc.</i>) 	<ul style="list-style-type: none"> - Regional/Local Govt' 	Alloggio di edilizia residenziale pubblica a canone sociale / Edilizia sovvenzionata	<p>Rental housing provided by a state or regional housing company to those on low-incomes who cannot meet their housing needs through the private market.</p> <p>- The cost of developing such housing is met almost entirely by state funds. As it target households in the lowest income bracket, rents are set at around 25% of the market rate</p>	<p>No</p> <ul style="list-style-type: none"> - Public rental agencies do often agree sales targets with regional authorities, though, with sales in 'mixed-tenure' buildings prioritised 	<p>Federcasa – Italian federation of public housing providers</p> <p>Legal overview of social and affordable housing</p> <p>Cassa depositi e prestiti (CDP) briefing on affordable housing in Italy</p>
Luxembourg	<ul style="list-style-type: none"> - Income limits (<i>required, though not defined, by law...up to social housing providers to decide upon</i>) - Family circumstances (e.g. number of children) - Priority given to people living in the commune in which housing is located - Cannot already be a property owner 	<p>A combination of</p> <ul style="list-style-type: none"> - National Govt - Local Govt (Commune) - Social housing providers 	Location sociale	construction financed up to 75% by the state and rent set by law using a mathematical formula adapted to each individual applicant (see Article 18 for full explanation of this formula)	<p>Yes</p> <ul style="list-style-type: none"> - If social housing units are being privatised, the tenant has the first right of refusal to purchase their home 	<p>Overview of social housing in Luxembourg</p> <p>Legal basis for social housing and social rent setting</p> <p>Eligibility criteria</p> <p>Housing assistance guide</p>
Netherlands	<ul style="list-style-type: none"> -Income (<i>80% of housing must be assigned to households with annual income below €38k per year; 10% allocated to those with income of €38k-€41k</i>) - Family circumstances (<i>those in urgent need of housing or with medical issues can be given priority</i>) <p>*The current income ceilings are indifferent to the composition of the household, the Government has recently proposed to reform this</p>	National Govt	Sociale huur	Rental housing provided by registered social housing providers to eligible households in accordance with the legally defined income limits	<p>No</p> <ul style="list-style-type: none"> - Social housing providers will periodically sell units to social tenants or other social providers, though this is at their discretion 	<p>Legislation outlining the functioning of social housing providers in the Netherlands – 'Woningwet'</p> <p>Dutch social housing federation - Aedes</p> <p>Eligibility guidelines from the Dutch Government</p>

Slovakia	<ul style="list-style-type: none"> - Income (<i>income thresholds are set at a local level</i>) - Family situation (<i>preference can be given for those with disabilities or health issues or urgent need, whilst always respecting the income limits – these criteria are decided upon locally</i>) 	<ul style="list-style-type: none"> - National Govt - Municipal Govt 	Verejné nájomné bývanie (sociálne bývanie)	Social housing is housing acquired with the use of public funds intended for adequate and human dignified housing of natural persons who cannot procure housing on their own initiative and meet the conditions under this Act	No	Overview of social housing in Slovakia from the Ministry of Transport and Construction Legal framework underpinning social housing	
Slovenia	N/A	N/A	N/A	Slovenia does not have housing which could be considered to be 'social' in the traditional sense of the term. It does, however, have rental housing which fits well within the idea of 'affordable' housing. Thus, please see 'Slovenia' under the affordable housing section	N/A		
Spain	<ul style="list-style-type: none"> - Must register with your municipality - Cannot already have accessed social housing (<i>unless you can show it no longer suits the needs of your household</i>) - Have no access to another suitable home - Not exceed income limits (<i>these are for each local area to decide upon. Typically they are a given multiple of the Indicador Público de Renta de Efectos Múltiples (IPREM), a Spanish income threshold used when granting access to social services and revised periodically. In 2020, the IPREM was €7,519.59</i>) - Family circumstances (<i>preference can be given for those in urgent need</i>) 	<ul style="list-style-type: none"> - A combination of - National Govt - Municipal Govt 	<ul style="list-style-type: none"> - Vivienda protegida / Vivienda de Protección Oficial (VPO) - Viviendas para alquiler sin opción a compra (public rental housing, without option to buy) 	<ul style="list-style-type: none"> - *Public rental without the option to buy : VPO rental housing is built by a developer using state subsidies. It must be rented out at an agreed affordable rent for a fixed period of time – typically around 25 years – after which time it can enter the private rental market. If the property is sold before the end of the agreed period, the developer must repay the state funds. - There are two options when it comes to public rental: <ol style="list-style-type: none"> 1. IPREM multiple of 3 : Rent of up to €5.50 per m² 2. IPREM multiple of 4.5 : Rent of up to €7 per m² - *please note that the terms 'social' and 'affordable' do not sit well in the Spanish context. For the purposes of this study, 'public rental without the option to buy' is being interpreted as being 'social' as opposed to 'affordable', but this is not based on any official Spanish classification 	No	AVS – Spanish federation of public rental housing providers Guide to VPO housing Guide to the IPREM and public rental housing Official government plan for the development of VPO rental accommodation State Housing Plan – 2018-2021 (Legal Text) Link to Housing Department of each Spanish region VPO house building statistics	
Sweden	No	N/A	Allmännyttiga hyresbostäder (public housing) = Housing available to all regardless of means. Public housing companies have to meet 'social objectives', but these are not clearly defined. In reality only a portion of public housing is used for low-income tenants	N/A	No	<ul style="list-style-type: none"> - However, some public housing blocks have been 'converted'/sold-off into cooperatives owned by sitting tenants at below market prices 	Public Housing Sweden – association of public providers

<p>United Kingdom (England)</p>	<ul style="list-style-type: none"> - Habitual and legal resident of England - Age (if applying for specific age targeted social housing) - Health (for social housing with supported living) - Family circumstances (e.g. preference for those experiencing family breakdown, overcrowding) - Does not have access to another residence (priority given to homeless) - Income limits (varies from local area to local area; no national criteria) 	<p>A combination of</p> <ul style="list-style-type: none"> - National Govt - Local Govt - Social housing providers 	<p>Social housing</p>	<p>Social housing is defined by the ‘Housing and Regeneration Act 2008’ as being housing which is:</p> <ul style="list-style-type: none"> - made available for rent - the rent is below the market rate - “is made available in accordance with rules designed to ensure that it is made available to people whose needs are not adequately served by the commercial housing market” 	<p>Yes</p> <ul style="list-style-type: none"> - local authority tenants can purchase their home after three years of occupancy - housing association tenants do not have an automatic right-to-buy, but current government is looking at introducing this in some form 	<p>Eligibility for social housing</p> <p>Overview of allocation and application rules</p> <p>Legislative framework</p> <p>‘Right to Buy’ guide</p> <p>Allocation of accommodation: guidance for local housing authorities in England</p>
<p>United Kingdom (Northern Ireland)</p>	<ul style="list-style-type: none"> - Age (typically 18 or older, though some exceptions can be made in exceptional circumstances; some schemes only open to older people) - Have a “connection” to Northern Ireland - Must be a legal resident - Family circumstances (priority to those who have been victims of sectarian intimidation, those experiencing homelessness, overcrowding, special healthcare/education needs) <p>*Eligibility criteria are ‘bundled’ together to assign housing using a ‘points based’ system (see); income is not a criteria</p>	<p>A combination of</p> <ul style="list-style-type: none"> - Devolved NI Assembly - Local Govt - Northern Ireland Housing Executive - Social housing providers 	<p>Social housing</p>	<p>Social housing is housing owned by either the Northern Ireland Housing Executive or a registered Housing Association</p>	<p>Yes</p> <ul style="list-style-type: none"> - A social housing tenant has the right to buy their home at a discounted price after five years of residence - Discount must be repaid if property sold within five years; social provider also has first right of refusal if home re-sold within 10 years 	<p>Applying for social housing in Northern Ireland</p> <p>Applying for right to buy</p> <p>Guide to the ‘points based’ housing allocation system</p> <p>Northern Ireland Housing Executive housing application overview</p> <p>NIHE allocation guide</p>
<p>United Kingdom (Scotland)</p>	<p>In Scotland, providers of social housing “have considerable discretion to develop their allocation policy and practice to meet the needs of the communities in which they operate”. However, legislation dictates that priority must be given to:</p> <ul style="list-style-type: none"> - those experiencing homelessness - those who cannot provide adequate housing for themselves through private markets (particular emphasis on those forced to live in overcrowded housing) - current social housing tenants who are living in under-occupied housing (i.e. downsizing to more appropriate housing) <p>*income is not a direct factor in the allocation of social housing in Scotland</p>	<p>A combination of</p> <ul style="list-style-type: none"> - Devolved Scottish Assembly - Local Govt - Social housing providers 	<p>Social housing</p>	<p>Social housing is rented housing provided by councils and registered social landlords, normally on a Scottish Secure Tenancy</p>	<p>No</p> <ul style="list-style-type: none"> - The RTB was ended in Scotland in 2016 	<p>Government housing delivery programme</p> <p>Most recent social housing supply report and data compendium</p> <p>Legislative basis for social housing</p> <p>Allocations guidelines</p> <p>Example of a typical ‘Social Housing Allocation Framework’</p> <p>Overview of social housing in Scotland</p>
<p>United Kingdom (Wales)</p>	<ul style="list-style-type: none"> - Must be a permanent legal resident - Must be in good standing (i.e. those engaging in anti-social behaviour can be excluded from social housing) - Family circumstances (priority can be given to those in urgent need, such as those experiencing homelessness) <p>*Housing is primarily allocated based on urgency of need and the amount of time you have been on a waiting list, there are no income ceilings</p>	<p>A combination of</p> <ul style="list-style-type: none"> - Devolved Welsh Assembly - Local Govt - Social housing providers 	<p>Social housing</p>	<p>Social housing is the provision of housing at affordable rates for those whose needs cannot be met by the commercial housing market</p>	<p>No</p> <ul style="list-style-type: none"> - RTB was ended in Wales in 2019 	<p>Legal summary of social housing</p> <p>Legal definition of ‘registered social landlords’</p> <p>Information on the end of the Right to Buy</p> <p>Example of an allocations guide from a local authority</p>

Affordable Housing

Country or Region	Eligibility Criteria	- <i>decides on criteria</i>	How affordable housing is referred to	- <i>definition</i>	Right-to-Buy / Tenant Purchase	Useful Links
Austria	<ul style="list-style-type: none"> - Income thresholds (<i>depends on each region or city government</i>) - Legally full-time resident - Providers apply 'weighted' criteria (e.g. health, family circumstances, homelessness) 	<ul style="list-style-type: none"> - A combination of - National Govt - Local Govt - Social housing providers 	Gemeinnütziger Wohnbau (not-for-profit housing; cost-rental housing)	No formal definition – typically defined as housing provided by limited-profit housing associations. On average limited-profit rents are 23% below for-profit rents.	<ul style="list-style-type: none"> Yes - tenants may buy home between 6th-20th year of tenancy if they provided a capital 'downpayment' at the time of moving in equal to at least €72.07 per metre squared (index to CPI) 	<ul style="list-style-type: none"> Overview of limited-profit housing associations A guide to limited-profit housing
Belgium (Brussels)	<ul style="list-style-type: none"> - income threshold (logement modéré : net income of €23,283.18-44,348.97 depending on the number of wage earners; +€2,217.44 per dependent child and +€4,434.89 per dependent child with special needs. logement moyen : net income of €34,924.77-59,131.96 depending on the number of wage earners; +€2,217.44 per dependent child and +€4,434.89 per dependent child with special needs) - Cannot be a property owner - Must be legally resident in the country 	Brussels Regional Government	logement modéré ; logement moyen (affordable rental for modest and average salaries)	A housing unit rented by a local housing association to people with modest or average income and of which the rent is calculated based on government regulations (<i>the only difference between affordable and social is the income of a person, the housing units they can access should be the same</i>)	No	Guide to affordable rental housing
Belgium (Flanders)	<ul style="list-style-type: none"> - Income threshold (<i>this varies depending on the exact composition of the household and the location of the property (see); for example, a single person in 2020 had to have an income of more than €9,725, but less than €38,860</i>) - Cannot be a property owner - Must be legally resident in the country 	Flanders Regional Government	sociale koopwoningen (affordable purchase)	Homes built by recognised social providers to be sold at an affordable price (<i>as set down by regulations</i>) to clearly defined social groups.	N/A	<ul style="list-style-type: none"> The Association of Flemish Housing Companies (VvH) Buying a social home Legal basis for affordable housing Annual Flemish social housing reports
Belgium (Wallonia)	N/A	N/A	N/A	N/A	N/A	
Cyprus	<ul style="list-style-type: none"> - Must be an EU citizen or have been legally resident in Cyprus for at least 5 years - Income ceilings (<i>depends on composition of the household; this can mean the ceiling is anywhere from €22,000 to €76,000</i>) 	- National Govt.	<ul style="list-style-type: none"> - Σχέδιο Στέγασης Μέτρια Αμειβομένων (average remuneration housing) - Σχέδιο Προσιτής Κατοικίας (affordable housing) 	<ul style="list-style-type: none"> - Average remuneration housing : Through the CLDA, developable plots of land, below market cost houses and apartments are made available to sell. This is done in accordance with the outlined eligibility criteria. - Affordable housing : Housing units sold to eligible households at a price which reflects the average cost of construction. Purchasers cannot sell the house for at least 10 years and they must use it as their primary residence throughout this period 	N/A	<ul style="list-style-type: none"> Cyprus Land Development Agency – largest promoter of non-market housing Average Remuneration Housing Plan Affordable Housing Plan

Czech Republic	N/A	N/A	N/A	N/A	N/A	
Denmark	<p>Public housing is allocated based on the amount of time that a household has been on the waiting list. However, preference can be given to:</p> <ul style="list-style-type: none"> - Family situation (<i>elderly or disable people, people already renting public housing, families with children, homelessness</i>) – for each municipality to specify - Individual criteria specified by each Municipality <p><i>*No income threshold applies to the allocation of public housing</i></p>	<ul style="list-style-type: none"> - National Govt - Municipal Govt - Housing provider 	<p>Almene boliger</p> <ul style="list-style-type: none"> - Almene familieboliger (<i>family housing</i>) - Ungdoms- og studieboliger (<i>youth and student housing</i>) - Ældrebolig (<i>elderly housing</i>) - Enkeltværelser (<i>single room housing</i>) 	<ul style="list-style-type: none"> - Family housing : housing provided by a housing association or municipality at a cost-rent to couples either with or without children. - Youth and Student housing : housing provided by a housing association to students or young people unable to meet their housing needs - Elderly housing : housing provided by a housing association or municipality at a cost-rent to people with health or mobility problems. There is no minimum age requirement, though residents are typically elderly. Residents must need help with walking or have a visual impairment - Single room housing : housing provided by a housing association or municipality at a cost-rent. They are understood as being “one or more living rooms without their own kitchen” - <i>This is a relatively small scale housing solution at the moment.</i> 	No	<p>Danish Housing Ministry</p> <p>Danish Public Housing Authority</p> <p>Boligselskabernes Landsforening – Danish federation of housing associations</p> <p>Public housing information portal</p>
Estonia	N/A	N/A	N/A	Estonia has no housing which could be fairly categorised as being ‘affordable’	N/A	
Finland	<ul style="list-style-type: none"> - Urgency of need (<i>priority given to homeless people and others in desperate situations</i>) - Wealth (<i>taken into consideration, but no legal ‘limits’ exist. In Helsinki, high demand has led to lead to the introduction of clearly defined wealth limits. In 2020, the limit was from €95k-€191k depending on household size</i>) - Age (<i>right-of-occupancy housing reserved for those under the age of 55</i>) 	<ul style="list-style-type: none"> - National Govt - Housing Finance and Development Centre of Finland (ARA) - City of Helsinki 	<ul style="list-style-type: none"> - Kohtuuhintainen asuminen (<i>umbrella term for social and affordable rental</i>) - asumisoikeusasunto (<i>right-of-occupancy housing</i>) - Osaomistusasunnot (<i>part-ownership housing</i>) 	<p>Affordable rental: Housing which is constructed using state financing, loan guarantees and/or tax reliefs which must be rented out at affordable prices (not-for-profit) during the repayment period of the state loan (<i>after which the property can be rented out at market prices</i>)</p> <p>Right-of-occupancy: Housing which is constructed using state financing, loan guarantees and/or tax reliefs which is co-owned between the social tenant and the housing provider (<i>tenant must purchase 15 per cent share of the house to guarantee unconditional occupancy, whilst paying monthly occupancy charge - käyttövastike</i>)</p> <p>Part-ownership: Housing which is constructed using state financing, loan guarantees and/or tax reliefs which is partly owned by the tenant, usually for a fixed period of 5-12 years, at the end of which the tenant can either sell their investment or potentially purchase the home. Rent paid during the tenancy is on a cost-rental basis</p>	No	<p>Right of Occupancy housing overview</p> <p>Housing in Finland – overview of different options</p> <p>Part-ownership housing</p> <p>Right of Occupancy housing</p>
France	<ul style="list-style-type: none"> - Income limit (<i>can vary a lot depending on the composition of the household and the location of the affordable housing unit; for example, a couple with no dependents can have an income as high as €57,146 when all variables are considered : see</i>) - Legal full-time resident - Family, health, personal circumstances are considered 	<ul style="list-style-type: none"> - National Govt’ - Local Govt’ 	logement intermédiaire (<i>affordable rental housing</i>)	<p>Housing built with public financial assistance (tax benefits, public subsidies or preferential loans) in order to provide accommodation for those on low and modest incomes</p> <ul style="list-style-type: none"> - affordable rental housing differs from social housing in terms of the rents charged to tenants, the income limits applied and the terms of lending applied by the state for financing such developments 	Affordable housing units can be sold, but this is the exclusive discretion of the providers	<p>Applying for intermediate housing</p> <p>Eligibility for intermediate housing</p> <p>Legal basis for intermediate housing</p>

<p>Germany</p>	<ul style="list-style-type: none"> - Income threshold (<i>differs from region to region; limits are typically around 60% higher than the approximately €18,000 ceiling for two-adult social housing access</i>) - Must have been legally resident for at least one year 	<ul style="list-style-type: none"> - Federal Govt - Regional Govt 	<p>Dritter Förderweg (affordable rental)</p>	<p>Rental housing built using state funds, which must be made available to low-to-moderate-income households in line with regional limits and rented out at a price in accordance with clearly defined rules at a below market rate during a 'lock-in' period (i.e. the amount of time it takes the developer to repay the state loan; typically 15-30 years).</p> <p><i>- Affordable rental housing offers a slightly higher priced version of social rental housing</i></p>	<p>No</p> <p>- Social housing in Germany is social (<i>rented to low-incomes households at a defined rent</i>) for as long as it takes for state loans used in their construction to be repaid after which it ceases to be required to have a social function</p>	<p>GdW overview of social housing in Germany</p> <p>Most recent GdW annual report and data compendium</p> <p>Overview of income limits and rent setting in social housing in Germany (Hartz IV system)</p>
<p>Ireland</p>	<ul style="list-style-type: none"> - <u>Affordable purchase</u> - Must be a first-time buyer - Income (<i>max. €50k for a single person or €75k for a couple</i>) - Employment (<i>must have been in employment for last two years</i>) - <u>Cost-rental:</u> - To be determined (<i>building works have started, but will not be finished until at least mid-2021; to be aimed at "moderate-income" households</i>) 	<p>A combination of</p> <ul style="list-style-type: none"> - National Govt' - Local Authority - Approved Housing Body (<i>cost-rental</i>) 	<ul style="list-style-type: none"> - Affordable Purchase - Cost-rental 	<ul style="list-style-type: none"> - <u>Affordable purchase</u> spilt equity homes, where the percentage difference in the price paid for the home and the market price is retained as equity by the Local Authority (<i>for example, if paid 75% of market value, LA retains 15% equity</i>). The equity share will be paid off (<i>without interest</i>) at a later date or if the house is sold, the LA will get their share of the money - <u>Cost-rental</u> will offer rental accommodation at a price where the rent received by the provider will cover development and management costs 	<p><u>Cost-rental:</u> No. Will be provided by Approved Housing Bodies, who do not sell homes</p>	<p>Irish Housing Agency – provide data, research documents and guidelines on social and affordable housing</p> <p>‘Rebuilding Ireland’ – Government strategy to provide various affordable housing options</p>
<p>Italy</p>	<ul style="list-style-type: none"> - Must be legally resident in Italy - Not already own a property - Income limit (<i>varies from region to region and is based on household composition</i>) - Family circumstances (<i>priority can be given, for example: health issues, people over 65 years old, unable to work, more than three children, etc.</i>) 	<ul style="list-style-type: none"> - Regional/Local Govt' 	<ul style="list-style-type: none"> - Edilizia agevolata (assisted housing) - Edilizia convenzionata (agreed housing) - Residenziale sociale (affordable housing) 	<ul style="list-style-type: none"> - <u>Assisted housing</u> : Housing provided both for rent and for sale and aimed at households on low-to-middle incomes. It can be provided by private entities or by public housing companies - <u>Agreed housing</u> : Private housing provided for rent or for sale, whose transfer costs or rents are regulated by a specific agreement drawn up between the Municipality and the housing provider. - <u>Affordable housing</u> : Housing provided by private developers for either rent or purchase with public subsidies and/or other incentives such as building permits and land at discounted price. Developers can access finance from a specific financial instrument which includes resources the national investment bank and the state. It is aimed at middle income households who “are unable to sustain a market rent, but who are not so disadvantaged as to be able to access” traditional public rental or purchase housing 	<p>Sometimes</p> <p>- Affordable housing units can have a specific future purchase agreement written into the lease.</p>	<p>Federcasa – Italian federation of public housing providers</p> <p>Regulation of ‘Residenziale sociale’ (Legal text)</p> <p>Cassa depositi e prestiti (CDP) briefing on affordable housing in Italy</p>

Luxembourg	<ul style="list-style-type: none"> - Income limits (<i>required, though not defined, by law...up to affordable housing providers to decide upon individually</i>) - Family circumstances (<i>e.g. number of children</i>) - Priority given to people living in the commune in which housing is located - Cannot already be a property owner 	<ul style="list-style-type: none"> - A combination of <ul style="list-style-type: none"> - National Govt - Local Govt (Commune) - Social housing providers 	<ul style="list-style-type: none"> - Vente à coût modéré (<i>affordable purchase</i>) - Location abordable (<i>affordable rental</i>) 	<ul style="list-style-type: none"> - Affordable purchase is not currently defined by law. The SNHBM (state social housing provider) sets its own limits (currently €81,600 gross for a single person or €105,920 for a couple without children) - Affordable rental is capped at 33 per cent of net monthly income. To be eligible, your gross annual income must be no more than two times the national minimum (<i>salaire social minimum qualifié</i>) for a single person or a couple without children, or two and a half times for a household with children – minimum income in 2020 set at €30,844.68 	<ul style="list-style-type: none"> Affordable rental: Yes - If social housing units are being privatised, the tenant has the first right of refusal to purchase their home. However, the seller has first right to repurchase home if re-sold within 99 years of original sale 	<ul style="list-style-type: none"> Overview of supported housing options Affordable purchase overview Calculating affordable rental Law underpinning affordable housing schemes (1 of 2) Law underpinning affordable housing schemes (2 of 2)
Netherlands	N/A	N/A	N/A	N/A	N/A	
Slovakia	N/A	N/A	N/A	N/A	N/A	
Slovenia	<ul style="list-style-type: none"> - Must be an EU citizen - Family circumstances (<i>priority given to a number of groups. For example, families with a large number of children, economically marginalised households, young households, those with disabilities or health needs, those experiencing homelessness, key workers, etc.</i>) - Income (<i>rent ceilings based on net monthly earnings and the number of residents of the household are set. For example, for a two person household, net income cannot exceed €2,575.40 in 2020</i>) 	National Govt	neprofitnega stanovanja v najem (<i>non-profit rental housing</i>)	<ul style="list-style-type: none"> Non-profit rental housing : is housing provided to eligible households by a municipality, the state, a public housing fund or non-profit housing organisation - rents cannot exceed the combined costs of maintaining the property and repaying any funds borrowed for its construction 	No	<ul style="list-style-type: none"> Slovenian Housing Act – outlines different types of social and affordable housing The Housing Fund of Slovenia – largest social housing provider Information on how to rent a non-profit home Detailed eligibility guidelines
Spain	<ul style="list-style-type: none"> - Must register with your municipality - Cannot already have accessed social housing (<i>unless you can show it no longer suits the needs of your household</i>) - Have no access to another suitable home - Not exceed income limits (<i>these are for each local area to decide upon. Typically they are a given multiple of the Indicador Público de Renta de Efectos Múltiples (IPREM), a Spanish income threshold used when granting access to social services and revised periodically. In 2020, the IPREM was €7,519.59</i>) - Family circumstances (<i>preference can be given for those in urgent need</i>) 	<ul style="list-style-type: none"> - A combination of <ul style="list-style-type: none"> - National Govt - Municipal Govt 	<ul style="list-style-type: none"> - Vivienda protegida / Vivienda de Protección Oficial (VPO) - Viviendas para alquiler con opción a compra (public rental housing, with option to buy) - adquisición de Vivienda (affordable home purchase) 	<ul style="list-style-type: none"> - *Public rental with the option to buy : VPO rental housing is built by a developer using state subsidies. It must be rented out an agreed affordable rent for a fixed period of time – typically around 25 years – after which time it <u>can</u> enter the private rental market. However, the tenant may also exercise their option to buy their home before this. - There are two options when it comes to public rental: <ol style="list-style-type: none"> 1. IPREM multiple of 3 : Rent of up to €5.50 per m² 2. IPREM multiple of 4.5 : Rent of up to €7 per m² - *Affordable Home Purchase : VPO housing for sale is built using state funds, and must be sold at an agreed price to a qualifying household. The IPREM ratio will be anywhere from 3 to 5 depending on the composition of the household. - *please note that the terms ‘social’ and ‘affordable’ do not sit well in the Spanish context. For the purposes of this study, ‘public rental with the option to buy’ and ‘affordable home purchase’ are being interpreted as being ‘affordable’ as opposed to social, but this is not based on any official Spanish classification 	<ul style="list-style-type: none"> - Yes - Residents of public rental schemes that include the option to buy their home can do so after a specified period of time. This is typically after 5 years. 	<ul style="list-style-type: none"> AVS – Spanish federation of public rental housing providers Guide to VPO housing Guide to the IPREM and public rental housing Official government plan for the development of VPO rental accommodation State Housing Plan – 2018-2021 (Legal Text) Link to Housing Department of each Spanish region VPO house building statistics

Sweden	No	N/A	Allmännyttiga hyresbostäder (public housing) = Housing available to all regardless of means. Public housing companies have to meet 'social objectives', but these are not clearly defined. In reality only a portion of public housing is used for low-income tenants	N/A	No - However, some public housing blocks have been 'converted'/sold-off into cooperatives owned by sitting tenants at below market prices	Public Housing Sweden – association of public providers
United Kingdom (England)	<ul style="list-style-type: none"> - Habitual and legal resident of England - Age (for entry into age targeted social housing) - Health (for supported living housing) - Family circumstances (e.g. preference for those experiencing family breakdown, overcrowding) - Does not have access to another residence (priority given to homeless) - Income limits (varies from local area to local area; no national criteria) 	A combination of <ul style="list-style-type: none"> - National Govt - Local Govt - Social housing providers 	<ul style="list-style-type: none"> - Affordable rental (rented to qualifying households at no more than 80% of the local market rent) - Starter Home - Discounted market sales housing (DMSH) - Shared ownership 	<p>“housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)”</p> <ul style="list-style-type: none"> - Affordable rental: provided by local authorities or registered housing associations at a maximum of 80% of the local market rate - Starter home: new dwelling sold at no more than 80% of the market rate to a qualifying first-time buyer - DMSH: Homes sold to households based on income limits at no more than 80% of the market value and resold at a discount to other qualifying households in perpetuity - Shared ownership: A low to moderate income (below £80,000) household purchases a percentage of a home, with a local authority or housing association holding the rest of the value. The 'owner' pays rent relative to the share of the home they do not own 	Yes - affordable rental homes provided by local authorities can be purchased after three years of occupancy. New affordable homes provided by housing associations cannot be RTB purchased, though the Govt is looking at reforms in this area	What is affordable housing? – UK parliamentary report Legal outline of various affordable housing options Shared ownership guide Report on affordable rents versus social rents
United Kingdom (Northern Ireland)	<ul style="list-style-type: none"> - Age (over 18) - Resident in the UK - Do not already own a property - Have a 'positive' credit rating - Cannot afford to purchase a home which is suited to your needs 	A combination of <ul style="list-style-type: none"> - Devolved NI Assembly - Local Govt - Northern Ireland Housing Executive - Social housing providers 	<ul style="list-style-type: none"> - Co-ownership - Fair Share 	<ul style="list-style-type: none"> - Co-ownership: A low-to-moderate income household purchases a percentage of a home and rent the remainder off a housing association. In 2020, the scheme was also only available if the market value of the home was below £165,000 - Fair Share: Fair share sees housing associations sell 50%-90% of a home and charge rent on the balance. The scheme stipulates that the mortgage-to-gross income ratio must be no more than 4 for a single applicant or 3.5 for a couple. Applicants must also show that they cannot rent a home within a reasonable distance of their work. In 2020, a Fair Share home cannot cost more than £160,000 	Those availing of the Co-ownership and Fair Share schemes can eventually purchase 100% of their home, leaving the housing association without a financial stake	Shared ownership Fair Share scheme Fair Share guide

<p>United Kingdom (Scotland)</p>	<ul style="list-style-type: none"> - Cannot meet housing needs through the private market - Family situation (<i>priority may be given based on a number of personal or household characteristics, such as age, health, whether or not you have served in the Army, are a current social tenant, etc.</i>) 		<ul style="list-style-type: none"> - Mid Market Rent (MMR) - New Supply Shared Equity (NSSE) - Open Market Shared Equity (OMSE) - Shared Ownership 	<ul style="list-style-type: none"> - MMR : Rental properties aimed at people on low and modest incomes that are not enough to afford owner occupation but who can afford to pay more than a social housing rent. Rent cannot exceed the 'Local Housing Allowance' rate for the type of dwelling and area, as set by the Scottish Govt. - NSSE : A first-time buyer will purchase 60-80% of a new property produced by a social landlord, with the balance being held by the Scottish Govt. No rent is paid on the balance, but the Scottish Govt. gets its equity share when the home is sold - OMSE : A first-time buyer will purchase 60-90% of an existing property, with the balance being held by the Scottish Govt. No rent is paid on the balance, but the Scottish Govt. gets its equity share when the home is sold. House price limits exist, though these vary depending on location and the characteristics of the house - Shared Ownership : A household buys either 25%, 50% or 75% of their home. The balance is owned by a social provider. An 'occupancy charge' is paid on the balance. A larger share can be purchased, at the discretion of the social provider. 	<ul style="list-style-type: none"> - MMR : No – RTB ended in 2016 	<p>NSSE Scheme</p> <p>OMSE Scheme</p> <p>Shared ownership</p> <p>Scottish Government review 'Rent affordability in the affordable housing sector'</p>
<p>United Kingdom (Wales)</p>	<ul style="list-style-type: none"> - Must be a permanent legal resident - Must be in good standing (<i>i.e. those engaging in anti-social behaviour can be excluded from social housing</i>) - Family circumstances (<i>priority can be given to those in urgent need, such as those experiencing homelessness</i>) - Must be unable to afford to provide housing without accessing an affordable housing scheme 	<p>A combination of</p> <ul style="list-style-type: none"> - <i>Devolved Welsh Assembly</i> - <i>Local Govt</i> - <i>Social housing providers</i> 	<ul style="list-style-type: none"> - Intermediate housing - Shared ownership 	<ul style="list-style-type: none"> - Intermediate housing : Rental property aimed at those who cannot meet their housing needs through the private sector. Rents are at least 20% below the market rate. Income limits apply, though these will vary depending on area and provider - Shared-ownership : Purchase 25-75% of a home and pay rent on the balance to a social provider. In 2020, must have a household income below £60,000. Households can gradually increase their stake up to full ownership. 	<p>Intermediate housing : No – RTB ended in 2019</p>	<p>Intermediate rental housing guide</p> <p>Definitions of affordable housing types</p> <p>Planning for affordable housing</p> <p>Latest affordable housing provision statistics</p> <p>Shared ownership</p>