



This *Habitation à Loyer Modéré* (HLM) tower in *Les Presles* in the Parisian outskirts of *Épinay-sur-Seine* is one of the many (47%) social-housing buildings in the quarter. The area is also part of the French 'Sensitive Urban Development Zones', or ZUS (see Chapter 8 in this book).

Photograph: Nicolas Oran.





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Introduction

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For much of the post-war period, the model of social housing was broadly similar across Northern and Eastern Europe: there was a heavy emphasis on state-supported housing construction to overcome the effects of extreme destruction and lack of investment during the war, to accommodate rapidly growing populations, to help bring economies back to some sort of normality and to ensure employment.

The mechanisms for achieving this expansion in housing investment differed between countries. In most of them, local authorities (hereafter referred to as LAs) were heavily involved, either building municipal housing themselves or creating the conditions for independent social landlords to do so. However, the forms of central-government subsidy and intervention were specific to each country, and helped mould longer term approaches to ensuring 'a decent home for every household at a price they could afford'.

The extent to which housing was seen as part of the welfare state – and thus part of the contract between citizens and government – also varied. In Eastern Europe, social housing was very much based on state provision of the social wage and in most of Northern Europe, it was seen as an important part of the welfare-state contract, but in Southern Europe, the policy emphasis was more on supporting family provision of housing – and this meant owner occupation.

Among what might be called the welfare-state economies, the most important distinction was between countries that saw social housing as a mechanism for providing for *all* types of household, and those that emphasised provision for *lower income* households. As numerical housing

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shortages began to be overcome, this distinction became more embedded, and was further strengthened by the increasing emphasis on privatisation and private finance during the 1980s and 1990s.

By the new century, there was a clear distinction between countries whose governments wanted to withdraw from housing provision (as opposed to support) and those that continued to see an important mainstream role for social housing, particularly in urban renewal. Eastern European countries were in the forefront of withdrawal – and often did so without putting in place other mechanisms for supporting lower income and vulnerable households. At the other extreme was the Netherlands, where social housing providers became increasingly strong in financial terms and took on more and more urban investment opportunities.

It was in this context that in 2006, a group of French researchers, supported by some French government funding through the *GIS Réseau Socio-Économie de l'Habitat*, brought together interested academics from across Europe to gather statistical and qualitative evidence on how social housing was developing across the continent. The patterns observed suggested that there were many similarities across countries – notably with respect to who lived in the sector, how it was organised and how it had traditionally been financed. However, there were also strong differences in scale, ethos and expectations for the future role and funding of social housing.

The publication in 2007 of the group's first collection of papers, *Social Housing in Europe* (Whitehead and Scanlon 2007), was supported by the Higher Education Innovation Fund and the Department for Communities and Local Government. The text – which was mainly descriptive – was welcomed by a wide range of audiences, including politicians and their advisors in both central and local government, practitioners involved in providing and managing social housing and housing and urban researchers across the world. But there was clearly a need for a more detailed analysis of the different elements of social housing provision and the benefits and costs to tenants, providers and governments alike. As a result, the group got together, again supported by the GIS, to produce *Social Housing in Europe II* (Scanlon and Whitehead 2008). In this collection, the contributors looked to explain the different models of provision, financing and regeneration that have been developed across Europe, to examine the history and ideologies that lie behind the role of social housing in various countries, and to understand better who benefited and who was excluded from assistance. This text was published in England in 2008; a much-modified and updated version was published in France in 2010 under the title *Le logement social en Europe au début du XXI^e siècle: La révision générale*.

Since 2007, Europe has suffered as a result of the credit crunch, the subsequent financial crisis, the continuing debt crisis and recession. Individual

countries have been affected to different degrees, and their responses have also differed greatly – not only because the depth of the crisis has differed but also because of their institutional structures and past experience. Even so, there has been considerable convergence in certain aspects, notably in terms of the types of household that live in social housing and the perceived need for increased private involvement.

In 2012, encouraged by continuing international interest in the work, we decided to update the material reflecting the current European situation. This book provides an overview of the state of social housing in Europe in 2013. It covers 12 countries in detail. While it does not claim to be comprehensive (there are 27 member states of the European Union, plus several non-members), it does cover the continent's most important housing markets – including more than 80% of all social housing in the EU and all the countries where the proportion of social housing is 18% or greater. The coverage of countries with small stocks of social housing is more selective. The omission of some countries – notably Italy, Greece and some of the former communist states of Eastern Europe – reflects the historic concentration of academic housing scholarship in the countries of Northwest Europe. The book also covers three cross-cutting themes that are a key to the foundations and development of social housing in all the countries: history, legal and financial structures and more recent trajectories of privatisation and urban regeneration.

The rest of this chapter provides a comparative review of selected material from the country chapters, beginning with the stock of social housing in each country.

National stocks of social housing

It is impossible to provide entirely consistent comparative figures for the stock of social housing, both because different countries define the tenure in different ways and because of the limitations of the data. The definition of the tenure may be based on rent levels (social rents are below market rents), ownership (social dwellings are owned by particular types of landlords), or the existence of a government subsidy or allocation rules (social dwellings are assigned to households via an administrative procedure rather than the market). Most social housing statistics are based on ownership of the dwelling, but Haffner *et al.* (2009, 2010) concluded that the last definition – social housing is that which is administratively allocated on the basis of need – was the only one that could provide a consistent identification of social housing stocks in cross-national comparisons. 'The main distinction we identified between (private and social renting) was that market housing is allocated according to effective demand while



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social housing is allocated according to need, the assumption being that the market will not provide according to a socially determined level of need that is different from effective demand' (Haffner *et al.* 2009: 235). In order for administrative allocation to work, though, social rents must be lower than market rents – otherwise, households who can pay their own housing costs will simply rent on the open market, leaving vacancies in the social stock.

However useful it would be to find a consistent basis for comparison, most of the figures we do have are from each country's national statistics and are based on ownership. Table 1.1 gives the most recent figures for housing tenure in the 12 countries included in this book. These are for social rented housing only and do not include social owner occupation, which is important in Spain.

Table 1.1 classifies the countries into three groups according to the size of the social rented sector. In three countries, social housing makes up over 20% of the overall housing stock. The Netherlands, with nearly one-third of dwellings in social rental, tops the list, and Austria and Scotland also fall into this category. There is a cluster of four countries with social rented sectors of just under 20% of the stock. These countries – Denmark, Sweden, England and France – have had a long-term commitment to significant social housing provision, although the numbers of dwellings have generally fallen since the heyday of social housing in the 1960s. Finally, five countries have less than 10% of housing in this tenure: Ireland, the Czech Republic, Germany, Spain and Hungary. Most of the dozen or so of post-socialist countries, which are treated as a group in the chapter by Hegedüs, Lux, Sunega and Teller, also fall into this category. Spain and Hungary, with only 2 and 4% respectively of the housing stock in social rental, have the smallest proportions of social rented housing – Spain because historically social housing has been provided in the form of owner occupation rather than rental, and Hungary because of the mass privatisation of state-owned housing after the fall of communism. Germany's figure of 5% also requires some qualification, as this represents only that part of the stock still under legal restrictions with regard to rent and access. A further 5% or so is owned by (mostly public) landlords who operate it as if it were social housing.

In general, countries with a medium or high level of social housing belong to the set of relatively wealthy European welfare states. Those in the 'low' group have traditionally placed far stronger emphasis on owner occupation (Spain, Ireland) or are former communist countries that privatised or restituted state-owned or social housing after the fall of communism (Hungary, the Czech Republic). Germany is the exception here – in many other contexts, it is seen as one of Northern Europe's welfare states, but its approach to social housing differs radically from that of its neighbours, as it is provided through time-limited subsidies mainly to private landlords.

Table 1.1 Housing tenure of dwelling stock: highest to lowest by percentage of social rented housing (most recent year).

Size group	Country	Year	Social rented housing		Change in preceding decade (%)	Private rental		Owner-occupation	
			Number of dwellings (000s)	Percentage of stock		(Percentage of stock)	(Percentage of stock)	(Percentage of stock)	
High	The Netherlands	2010	2300	32	-4	9	59		
	Scotland	2011	595	24	-6	12	64		
Medium	Austria	2012	880	24	+1	16	50	10	
	Denmark	2011	541	19	+1	17	49	18 [†]	
	Sweden	2008	795	18*	-3	19	41	22	
	England	2011	4045	18	-2	18	64		
	France	2011	4472	16	-1	21	58	5	
Low	Ireland	2011	144	9	+1	19	70	3	
	Czech Republic	2011 [‡]	312**	8**	-9	10**	65	18	
	Germany	2010	1054 <i>de jure</i> 1000 <i>de facto</i>	5	-3	49 ^{††}	46		
	Hungary	2011	117	3	-1	4-8	88-92	1	
	Spain	2011	307	2	+1	11	85	2	

Sources:

Austria	Statistik Austria	Germany tenure split	Dol and Hafnner (2010, Tables 3.5 and 3.6)
Czech Republic	Census data	Germany stock figure	Chapter 11, Table 11.2
Czech tenure split, Sweden	CECODHAS Housing Europe 2012	Hungary	2001 and 2011 Census, EU-SILC
Denmark tenure split, Spain	Realdata 2012	Ireland	Central Statistics Office 2011; stock figure from chapter Chapter 2
Denmark social stock	Author's calculations based on Denmark Statistik data	Netherlands	Scottish Government 2013
England	DCLG Tables 100 and 104 (December 2012)	Scotland	INE; CECODHAS for 2011 tenure split
France	2011 from USH <i>Données Statistiques</i> 2012 and INSEE Enquêtes Logement; and 2001 figures from INSEE Enquêtes Logement 996 and 2002	Spain	SCB (2012) Stockholm Statistics
		Sweden	Sweden. [Yearbook of Housing and Building Statistics 2012]

Figures based on national definitions of 'housing stock', which are not consistent. See Dol and Hafnner (2010, Table 3.1).

Note:

*Owned by municipal housing companies; not synonymous with social housing (see chapter 6).

[†]Cooperative housing.

[‡]Preliminary results from Census 2011, Czech Statistical Office.

**Rough estimates. Total rental housing = 17.6%; breakdown between social and private rental sectors (hereafter PRS) is not known. About 8% is public housing, which is not synonymous with social housing (see chapter 10).

^{††}Legally, all rentals are private rental. This includes social rental by municipal or other companies.



Ownership

There are two main types of owners of social rented housing: companies in municipal ownership or municipalities themselves (in the United Kingdom, the term 'council housing' was long synonymous with social housing) and non-profit organisations usually known as housing associations (hereafter referred to as HAs). In some countries, such as Denmark, all the social stock is owned by HAs; in others, such as the Czech Republic, all social housing is municipal. Most countries have a mix, although the relative proportions in each type of ownership vary widely. Germany and Spain are exceptions: Germany because much of its social housing is provided by private landlords with state subsidy, and Spain because the bulk of its social provision is in the form of subsidised owner occupation rather than rented housing.

In recent years, there has been a trend in many countries for social housing to move out of public ownership, often into the hands of not-for-profit HAs with a social mission. This has been driven partly by a desire to reduce pressure on public budgets, and partly by a neo liberal belief that private providers can be more efficient and responsive to residents.

Rents

Rents in social housing are generally lower than rents in the private sector (Table 1.2). In some places, the difference can be very large – particularly in urban areas with high market rents, such as Paris. But in some countries, rent controls or regulations apply equally to the social and private sectors, and rents in the two sectors are similar (Austria, the Netherlands); in others (e.g. Sweden), social housing rents influence private rents through a 'mirror' system first introduced in Germany, whereby market rents can only exceed social rents by a certain margin.

One of the features of social housing is that in most countries it offers a home for life – that is, once a household has secured a social tenancy, it can remain even if its income increases over the eligibility ceiling or family size changes. Some countries have legal provisions for increasing rents when household income goes up, but they are rarely applied because they are difficult to enforce and tend to push out stable, employed households, who are seen as vital anchors of social housing communities. The UK stands out in this regard, as the government is considering introducing limited-term tenancies for social housing and has made housing-benefit changes that will force some tenants to move if they occupy homes that are 'too big'.

Table 1.2 Social and private rent determination and levels.

Country	Social rented housing		Private rented housing		Private rents as Percentage of social rents %
	Rent determination	Average annual rent (£/m ²)	Rent determination	Average annual rent (£/m ²)	
Austria	Cost-based	68.4 (2011)	Also cost-based; private less than 10% higher (in post-1953 buildings, there is <i>de facto</i> no regulation)	80.4 (2011)	111
Czech Republic	Cost-based in new stock. Part of municipal stock had regulated rents, but rent control recently lifted	11 (2004)	Rent control applied until recently; market rents since 2011–2012	25 (2004)	227*
Denmark	Cost-based at estate level. Around 3.4% of building cost plus bank charges	80 (2005)	Mirror rents for dwellings constructed before 1991 (about 90%); rents on post-1991 dwellings freely set	82 (2005)	103
England	Until 2012, rent restructuring regime based on local earnings and dwelling price; increases RPI plus 0.5/1%. HAs and LAs must cover outgoings. From 2012 for many new HA lettings, rents up to 80% of market	(<i>Entire dwelling</i>) Mean: 4889 Median: 4579 (2010–2011)	Market determined for properties let since 1989; rents on earlier leases (less than 2.5% of the current PRS stock) still subject to 'fair rents' rules	(<i>Entire dwelling</i>) Market rents: Mean 10 087 Median 8540 (2010–2011)	206 mean 286 median

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France	Central government decreases maximum rents for new construction (which vary according to four geographical zones). Related to costs of construction	63 (2011)	Since 1948 rent on new leases free, but rises regulated	98 (2011)	155% Theoretical average, with correction for quality. Difference in Paris 284%
Germany	Rents vary with building period and funding programme (1st and 2nd strands, other determinants). In some regions rents vary with household income	'Cold' rent of 66–96 (excluding heating costs) for social dwellings produced or rented after 2000	Rents on new leases governed by rents on comparable properties, but close to market. Rises regulated		Private rents about €7.20 to €8.40/m ² above social rents. Utilities and water additional; services (doorman, street-cleaning, insurance) can add up to 18/m ² p.a. and heating a further 15.6/m ² p.a.
Hungary	Set by LAs on various bases but generally so low that they do not cover running costs. Cost rents required under some funding schemes	9.8 (2012) but with large differences between municipalities	Market rents.	28.3 (2012); 46.2 for new contracts signed in 2012	289
Ireland	By law, generally income-related since 1976 for local authority-provided general needs housing although each local authority has own system. Cost rents are used for special-needs housing provided by HAs	Average monthly rent €46.85/dwelling (2008)	Rent control abolished 1981, now market determined		

(continued overleaf)

Table 1.2 (continued)

Country	Social rented housing		Private rented housing		Private rents as Percentage of social rents
	Rent determination	Average annual rent (£/m ²)	Rent determination	Average annual rent (£/m ²)	
The Netherlands	Rent based on points system that reflects 'utility value of dwelling' and target household income level. Proposal to change to % of market value	60 (2009)	Market-determined for dwellings renting for more than €681/month in 2013; others administratively set	95 (2009)	158
Scotland	Locally determined historic cost-based systems for both individual LAs and HAs, so no government control	(Entire dwelling) All social stock: 3441 (2011); local-authority-owned 2580; housing association-owned 3669	Market rent since 1988, although a small and declining number of administered 'Fair Rents' from before that date	(Entire dwelling) 5140 in 2011, but figure derived from data collected for housing allowance purposes, not overall market rents	150
Spain	Cost-based	21 (2008)	Market rents since 1965, but increases controlled	68 (2008)	324*
Sweden	Set by annual collective bargaining between landlords and Tenants' Union; vary with age of building	88 (2008)	Related to and slightly higher than social rents	92 (2008)	105

Source:

Austria Country chapter/Statistik Austria
 Hungary, Netherlands, Spain, Sweden Dol and Haffner (2010, Table 4.6)

Czech policies Chapter 10.
 Other Hungary data Chapter 12.

Denmark rent figures from chapter 5; other cells: Realдания report
 England, Germany, Netherlands, Spain Realдания report
 Sweden Chapter 6

France L'Union Sociale Pour l'Habitat *Données Statistiques* 2012; CGDD/SOeS Comptes du logement 2012.
 *This figure is for rented housing, but owner occupation is the standard form of social housing in Spain. The average price/m² of free-market housing was €1566 in 3Q2012, versus €1142 for social owner-occupied housing, so the free-market price was 137% of the social price. Calculations based on Ministry of Public Works (2012).



Access

Historically, the view in much of Northern Europe was that social housing should accommodate the elderly, the deserving poor and particular groups of employed people (see Chapter 15). In many countries – notably Scandinavia and the Netherlands (and, in the past, the UK) – the social sector housed a range of income groups. Even today in Denmark, Sweden and the Netherlands, in particular, living in social housing is not necessarily regarded as inferior to owner occupation. But even in countries where most people rent their homes, higher income households have always preferred owner occupation to living in rented housing, whether social or private. And there is no country in which the income distribution of households in the social sector is the same as that of the population as a whole.

Today, the income divide between households in social housing and those in other tenures is becoming increasingly sharp. Most countries now impose formal income ceilings for access to social housing (Table 1.3) and others, such as England and Scotland, use criteria that, in practice, have the same effect. This reflects a general ideological shift away from the notion of state-subsidised accommodation available to all; pressure on public finances, particularly in the wake of the global financial crisis, and the EU's position that state subsidies for housing for middle- and upper-income households conflict with EU competition law (see Chapter 19).

Most countries now limit access to social housing to households at the lower end of the income distribution. However, the percentage of households eligible is normally far in excess of the proportion of social housing in the overall stock, even in countries with large social stocks. In Austria, for example, social housing makes up 23% of the housing stock, but 80–90% of the population is eligible. At the other end of the spectrum, in Hungary only 3% of the housing stock is social but 15–40% of households are eligible, depending on where they live.

Some of this mismatch is more apparent than real, as by no means all eligible households want to live in social housing. However, in almost all countries the demand for social housing exceeds the number of available units. Various rationing methods are employed, including waiting lists, ranking of households (in England, e.g. homeless persons, families with children and disabled people are given priority) or – in some countries – insider information, side payments, and so on. But even in the countries where housing pressure is highest there are areas with low demand, where social housing units are empty and difficult to let. These may be used as a sort of housing of last resort for households who cannot be accommodated elsewhere or, in some areas (e.g. eastern Germany) simply demolished.

Table 1.3 Access to social-housing: income limits.

Country	Income limits at entry		Percentage of population eligible for entry	What happens if income later exceeds limit?
	Formal	De facto		
Austria	Yes	Yes, but rather high	80–90	Rent unchanged
Czech Republic	Varies by municipality	Yes, very diverse	Not available	Municipalities are free to set own policies
Denmark	No	Yes	100	Rent unchanged
England	No	Yes	100*	Rent unchanged if incomes rise – but government is considering 'pay to stay' for local-authority tenants with incomes above £60 000
France	Yes – vary by housing category and zone	Yes	Theoretically, 64% of households, but allocation only available to non-owners, reducing it to 33%	Tenant may have to pay a supplemental rent known as SLS (applies to about 3% of social tenants). Eviction possible if income increases to twice the ceiling – although this is very rare
Germany	Yes – vary by region	Yes	Probably 20, but lower availability	Municipality has the right to raise rents for households with higher incomes, but this is rarely done as it drives people with social capacity out of social housing estates
Hungary	Yes – vary by municipalities and programme types	Yes	Varies by programme type – 15 to 40	Tenant can stay, there are no income limits for continuation of the tenancy
Ireland	Yes	Yes	Very limited; maximum income €35 000 for single-income household	Rent rises
The Netherlands	No formal limits; issue is under debate	Yes	About 40	
Scotland	No – not legally allowed to ask about income	Yes	100*	Nothing
Spain	Yes	Yes	Over 80 (for some type of social housing, including VFO)	Can be evicted, but very rarely happens
Sweden	No	Yes	100	Rent unchanged

*Source:*France L'Union Sociale Pour l'Habitat *Données Statistiques* 2012

Czech and Netherlands CECODHAS 2012

Other countries Country chapters and experts

*But access based on legally defined 'housing need'.



Housing allowance

Even though social rents in most countries are lower than private rents, that does not mean that all low-income households can afford to pay them (except in a small number of countries, like Ireland, where rents are set in relation to tenant incomes). Rent levels normally depend on the cost of provision of the housing or on the relative desirability of the unit – and there may be a large gap between the rents charged and the ability of poorer tenants to pay. Thus, all countries covered in this book provide additional income-related housing cost subsidies for low-income households (Table 1.4). These subsidies, known as housing allowances or housing benefits, are usually provided by national governments but can also (or instead) be given by regional or local ones.

These subsidies are normally available to both private and social tenants, and also often to at least some categories of owner occupier. In Denmark, for example, homeowners who are pensioners are eligible, while in England and Scotland, mortgage borrowers who lose their jobs can have their mortgage interest (up to a ceiling) paid for a limited period. Spain is unusual in having abolished its rent-support programme as part of government expenditure cuts in the wake of the recent crisis.

Support for housing costs is sometimes targeted at particular types of households – usually pensioners and households with children. There are often limits on eligible rents and/or dwelling size in relation to household size – to ensure that government subsidy does not support overconsumption. The amount of subsidy depends on what households are expected to be able to pay. Subsidy may cover the entire gap between the actual rent and assessed ability to pay (e.g. the Czech Republic expects households to spend 30–35% of their income on housing costs), but more often there are cash ceilings or minimum payment requirements. These mean that subsidies can fall short of actual rents, especially in high-cost areas.

Demographics of social tenants

The demographics of social housing tenants (Table 1.5) are strikingly similar across countries. Broadly speaking, the old and the young live in social housing: pensioners and single-parent families are heavily overrepresented in almost all countries, while couples with children are underrepresented. In all countries, social tenants have lower-than-average incomes – often much lower (as one would expect and as the EU now may require – see Chapter 19). This is true even in those countries with universalist social housing traditions such as Sweden and the Netherlands.

Table 1.4 Income-related subsidies for households.

Country	Eligibility	Amount
Austria	There are three types of housing subsidy. Eligibility depends on income, household size and type in relation to dwelling size, rent levels and rent increases	Varies across regions
Czech Republic	<i>Housing benefit</i> : for all households that spend more than 30% of income (35% in Prague) on housing. Floor-area and cost ceilings apply <i>Housing supplement</i> for people in material need	<i>Housing benefit</i> : Housing costs above required household contribution are covered <i>Housing supplement</i> can cover full housing costs with no ceiling applied (varies by municipality)
Denmark	Low-income households with children and pensioners	For pensioners maximum €410/month; others €398 (2013)
England	<i>Housing benefit</i> : For tenants. Based on rent of specific property, household income and characteristics <i>Support for Mortgage Interest</i> : For owner-occupiers with mortgages who become unemployed	<i>Rent</i> : Maximum 100% of rent and eligible service charges for appropriate sized unit – additional limits in the private rented sector <i>Support for Mortgage Interest</i> : Covers interest payments on loans of up to £200 000 for maximum two years Calculated on basis of Bank of England average mortgage rate
France	<i>Aide personnalisée au logement (APL)</i> and <i>allocation logement (AL)</i> . Eligibility depends on income and household size, but available in principle to all tenures. Current recipients include 5 million tenants and 500 000 owner-occupiers.	All households must pay a minimum of about €30/month. Above that, a percentage of 'eligible rent' (which varies by area and is lower than actual rents) is covered. This percentage varies and is up to 100% for the very poor. Maximum APL is about 90% of maximum social rent. Average APL/AL in 2010 was €238/month
Germany	1. <i>Wohngeld</i> : federal housing-payment subsidy related to income and rent (excluding utilities) or mortgage payment. For lower income to medium-income group 2. Recipients of social benefits, subject to limits on floor space and rent level	1. Complex formulae apply 2. Rent is paid in full

(continued overleaf)

14 *Demographics of Social Tenants***Table 1.4** (continued)

Country	Eligibility	Amount
Hungary	There is a national housing-allowance scheme as well as rent subsidies managed by municipalities. Typically only for tenants of public housing, but there are some special programmes for private rentals	Various rates, but generally too low to cover all housing expenses especially when energy use included
Ireland	Private renting tenants in receipt of social-security benefits, or participants on return-to-work or education schemes. Not available to social renters and owner-occupiers.	Tenants must pay a small flat contribution to their rent – currently, €30 per week. The maximum rent subsidy available is subject to a ceiling, which relates to household type and location
The Netherlands	Households that meet income criteria in dwellings whose rent is below €681/month (in 2013). Not available to owner-occupiers.	Maximum €300/month
Scotland	Private renting tenants can receive a rent allowance, based on eligible rent for that area and their household income and characteristics. Social renting tenants get the rent covered depending on household income and characteristics, although property considerations are about to be introduced. Not available to owner-occupiers.	Maximum 100% of rent and eligible service charges, but this rarely covers 100% of the actual as opposed to eligible rent within private sector
Spain	National <i>renta básica de emancipación</i> was removed in December 2011, although tenants already in receipt of the allowance can continue to receive it until the end of its four-year term. Not available to social renters or owner occupiers.	Allowances still exist in some regions but are very limited
Sweden	The elderly and low-income households with children	Maximum amount does not depend on housing cost, and may not cover rent on new apartments

Source:

France Union Sociale pour l'Habitat *Données Statistiques* 2012 CGEDD SOeS 2012; Ministry of Housing statistical department *Comptes du logement*

Other countries Chapters 2–7 and 9–14.

*Only pensioners.

†State covers interest element of mortgage payment for some borrowers who become unemployed for up to 2 years.

Table 1.5 Demographics of social housing tenants.

Country	Age/household type	Income
Austria	Young families (on new estates); older people/singles (on older estates)	Municipal housing: working class/low income. HAs more middle income
Czech Republic	Pensioners and unemployed slightly overrepresented	Lower than average
Denmark	Nearly 57% of social tenant households are single persons (most often women), and 68% have only one adult. Children and young people	Average household income 68% of national average
England	Single parents; older and one-person households	Low incomes – on average, 50% of overall average household income
France	Somewhat younger than households nationally, although not as young as in the PRS. Single people and single parents overrepresented	Increasing concentration of low-income households in sector since 1984
Germany	Single parents, single people, childless couples	Increasing concentration of low-income households
Hungary	Single-parent families are overrepresented	Low income and social status
Ireland	Single-parent families and couples with children	Nearly 62% have incomes below 60% of median (vs 22% overall); dependent on state transfers
the Netherlands	Households older and smaller than national average, more likely to be on benefits and to be non-Dutch	Lower than average and falling, but there is still some 'skewness' – i.e. occupation by households not in target income groups. Some call this social mix
Scotland	Strong pattern of 'hollowing out', leaving young and old; singles and single parents	Low incomes – on average, half the median household income for owner-occupiers (respectively, £13k and £22k per annum in 2011)
Spain	Low-income households, first-time buyers, young or old people, female victims of domestic violence, victims of terrorism, large families, gipsies, one-parent families, and handicapped and dependent people	Lower than average
Sweden	Single parents; elderly single people	Below average

Source:

France

L'Union Sociale Pour l'Habitat *Données Statistiques* 2012

Other countries

See individual chapters



Similarly, ethnic minorities and immigrants tend to be overrepresented in social housing, which reflects the fact that, on average, their incomes are lower than those of indigenous populations and their initial housing conditions are often poor. Useful cross-national comparative data are hard to find, as each country collects statistics on a different basis, but Table 1.6 presents some indicative figures. Rules governing access for recent immigrants, particularly from outside the EU, vary across countries. Some allow migrants to enter social housing almost as soon as they arrive in the country, while others require a minimum residence period or particular legal or employment status. In post-socialist countries, Roma are often excluded (intentionally or not) from social housing.

Social housing accommodates households with lower-than-average incomes but is not always where the most vulnerable live (Table 1.7). Some countries provide special dedicated residences for homeless people, asylum seekers, drug addicts or victims of abuse. It is usually a municipal responsibility to ensure adequate accommodation for its population; how and where this is done depends on the pattern of the local housing stock. In some cities, vulnerable households are concentrated in low-demand parts of the social sector where there are more available units, while in others they end up in the lowest quality parts of the private rented sector.

This book is divided into two parts. First, there are chapters about social housing in individual countries, which focus on how the system actually works in practice and what the current sociopolitical and economic contexts may mean for the future developments of the sector. There are sections on countries with large, medium and small social housing sectors. As noted earlier, this division sometimes reflects important structural or historical similarities within those groups, but there are also significant differences amongst them. As scholars and housing policy experts, we must always be wary of the tendency to regard the systems in our own countries as benchmarks. A good understanding of national particularities is fundamental to comparisons and policy prescriptions, as the systems are so disparate, and their goals so wide-ranging.

The chapters in the second part of the book address some of the most important themes in current social housing research, including history, finance and law, and the relationship between social housing and the private sector. The questions they pose are recurrent ones in the field of housing policy: How do a country's legal framework and history condition its current housing situation, and shape the future? Who should live in social housing, and how can the tension between social mix and tight targeting be resolved? What is the relationship between social housing, where deprived households are often concentrated, and urban renewal? Finally, at the end of the book, we revisit these questions and offer some tentative conclusions.

Table 1.6 Migrants and ethnicity in social housing.

Country	Proportion of ethnic minorities/ immigrants in overall population	Percentage of all immigrants/ minorities who live in social housing	Percentage of social housing residents who are from a minority or immigrants
Austria	11% non-Austrian citizens; 18% with foreign origins (2010)	20+ ⁹ *	6%
Czech Republic	3% (2012)	Not available	Not available
Denmark	Immigrants and their children: about 10%	60%	About 25% (immigrants and their children)
England	10% of heads of household are from an ethnic minority; 7.5% of UK residents were born abroad	27% (minorities)	16% (minorities)
France		30% (foreign-born)	2x share in population
Germany	9% (immigrants)	Varies by region and city	Particularly high in Berlin and Munich
Hungary	Ethnic minorities: approximately 600–800,000 Roma (Dupcsik, 2009) and 237 000 other minorities (Census 2001) – altogether, about 8–10% of population. Immigrants: 2.9% of population in 2001 was born abroad, 80% reported they were of Hungarian ethnicity (Gödrí 2009)	Data available only for Roma: 12% (UNDP/WB/EC)	Share of Roma among social tenants is around 25–30%, occupying 20–25% of social dwellings (estimates)
Ireland	10% born abroad	Not available	Not available
The Netherlands	23% of housing stock occupied by households with non-Dutch head	51% of immigrants	31%
Scotland	All minority ethnic: 2%	17%	1.4%
Spain	Immigrants 11.22% as of end-2011	Not available	Not available
Sweden	15% of overall population; up to 89% in particular neighbourhoods.	Varies by region	Over 30% in metropolitan areas; 15% elsewhere

*In Vienna 33%. Until 2006, only Austrian citizens had access to municipal housing.
Source: Information from country chapters (2, 4–6, and 8–14) and authors except: England EHS 2010/11; 2011 census Scotland <http://www.jrf.org.uk/sites/files/jrf/poverty-ethnicity-Scotland-full.pdf>

Table 1.7 Very social housing: where the vulnerable live.

Country	In the social sector in general	In municipal housing	In housing owned by independent social landlords	In the private rented sector
Austria	No (exceptions at regional level)	Some (Vienna: emergency dwellings in municipal housing)	Some (e.g. asylum seekers, homeless people housed by charities)	Yes (migrants)
Czech Republic	Some (especially lone mothers, pensioners)	Some (municipal housing is the only type of social housing)	There is none	Yes (migrants, Roma, homeless, people in acute housing need)
Denmark	Municipality can use its 25% allocation for households in need according to local criteria	By tradition, this sector has had a high concentration of very vulnerable people	Asylum seekers yes, but they are not recognised as residents. There are also institutions for temporarily housing the homeless	Easy access means the PRS functions as acute housing provider more than social renting or owner occupation
England	Yes – the local authority is responsible for housing homeless families and determining priorities	Joint allocation processes between LAs and HAs. In those LAs that still have their own stock, vulnerable are concentrated in municipal housing	Special-needs housing and hostels concentrated in independent sector because of history of provision. Homeless and those in priority need allocated by LAs	Yes – partly in partnership with HAs and local government, partly just because the sector is easy to access and rent can be paid with housing benefit
France	Yes, but only in low-demand areas. New housing types such as <i>residences sociales</i> receive public funding	No, although departments are supposed to facilitate accommodation of excluded households. Provide temporary housing for homeless	No. Asylum seekers are supposed to be housed in La Commission d'Accès aux Documents Administratifs (CADA) but their numbers are highly limited. Temporary housing of homeless is increasingly provided by charitable associations	Yes, but the sector has shrunk. Hotels and private furnished accommodation used
Germany		Yes, where available		Yes
Hungary	Yes, the social rented sector provides more and more housing opportunities for vulnerable groups	Almost entirely made up of very vulnerable, but very limited provision	Very few independent social landlords (e.g. churches)	Yes, typically in the periphery of urban areas, poor standard housing where both the rent and the energy cost is affordable

(continued overleaf)

Table 1.7 (continued)

Country	In the social sector in general	In municipal housing	In housing owned by independent social landlords	In the private rented sector
Ireland	Most of those housed	All tenants have very low incomes but the sector also houses many older people, lone parents with low incomes and people with addictions	All tenants have low incomes but the sector also accommodates a large number of formerly homeless people and people with disabilities	Yes, with some LA involvement especially in determining individual-based subsidies
Netherlands	65% (HAs own many dwellings that are managed by a special organisation for homeless, etc.)	None	30% (with buildings of their own)	5%
Scotland	Yes – the local authority is responsible for housing homeless families and determining priorities	Joint allocation processes between LAs and HAs. In those LAs that still have their own stock, vulnerable are concentrated in municipal housing	Special needs housing and hostels concentrated in independent sector because of history of provision. Homeless and those in priority need allocated by LA	Yes – partly in partnership with HAs and local government, partly just because the sector is easy to access and rent can be paid with housing benefit
Spain	Yes	Municipalities use part of their small stock to accommodate households in need	Not available	Not available
Sweden		Poorest families tend to live in municipal housing		Younger single people

Source: Country chapters, country chapter authors.



This book is for anyone interested in how well Europe is meeting one of the eternal challenges of social welfare: housing its people.

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