Affordable living

Alternatives to the traditional homeownership model

Niamh O Regan Jamie Gollings



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ABOUT THIS REPORT

This report is part of a series on housing by the Social Market Foundation, generously supported be the Nuffield Foundation. Each of them is a comparative study of housing policy internationally, drawing on a combination of over 20 expert interviews and desk research. There is a particular focus on Australia, Canada, Ireland and New Zealand in this study, although other case studies are used when relevant. As English speaking, liberal market democracies, they share many of the same challenges that the UK faces in its housing sector, and so solutions found there are especially instructive.

This series of reports covers the following topics:

- An introduction to housing
- Planning reform
- Affordable housing (social housing and co-operative housing)
- Homeownership policies
- Renting

FOREWORD

As in many other nations, the current housing situation in the United Kingdom presents significant challenges for students, seniors, and those with average or fixed incomes. The traditional option of private homeownership is no longer a viable possibility for a significant proportion of the population. The soaring house prices have given rise to a new class of renters, but this option is also increasingly becoming unaffordable for many. Inadequate rental supply is further exacerbating the situation, compounded by the fact that incomes are not keeping up with the rising cost of living. The long waiting lists for social housing, coupled with the inability to keep up with demand have created a complex set of problems for governments at all levels who are scrambling to find solutions. The co-operative housing model, which has been successfully employed in the UK and globally, may offer potential solutions for these housing problems.

After working in co-operative housing in different capacities for most of my career I have seen the transformative impact housing co-operatives have had on people's lives. Housing co-operatives give a voice to its residents through its democratic governance model, allowing residents to vote on policy, financial and governance matters at annual general meetings. By serving on the board of directors and committees, residents have a say in their housing and learn new skills. Having security of tenure also provides peace of mind and alleviates the stress many people experience with precarious housing.

In light of my experience visiting housing co-operatives in many different countries, I find the co-operative housing model to be remarkably adaptable and versatile. One can opt to rent, purchase, or reside as a limited-equity occupant in a co-operative unit. Regardless of the selected model, co-operatives consistently exhibit a lively and cohesive community where neighbours are familiar with one another and offer one another support during difficult times. It is not surprising that co-operative housing members have fared much better than other housing types during COVID lockdowns.

To make co-operative housing an alternative tenure option, it is essential to facilitate the development of appropriate financial structures that allow for multi-stakeholder investment models like housing co-operatives to be created. In addition, enabling existing housing co-operatives to collectively leverage their assets to fund the development of new homes and refurbish existing properties is a common-sense approach to adding to the much-needed housing stock.

Ensuring good social housing policy requires a consistent and cohesive approach, as well as long-term and steady funding, including leveraging private investments to raise new capital. By considering the measures proposed in this report, policymakers and community-led housing providers can work together toward providing safe and affordable housing to those left at the bottom of the property ladder.

Vienna's approach to building non-profit housing serves as an inspiring example of how a long-term vision for housing can create a stable society. By continuously constructing mixed-use social housing, Vienna has managed to keep housing prices affordable for many. This has prevented a housing crisis from arising, allowing people to live comfortably and pursue their dreams without worrying about basic needs. These alternatives offer residents security of tenure and greater control over their living arrangements, making them an attractive option for those seeking a middleground between rental housing and homeownership, and can play a crucial role in providing individuals with lower or middle income the opportunity to live in a secure and supportive environment.

Julie LaPalme

Secretary-General of Cooperative Housing International

EXECUTIVE SUMMARY

Security of tenure and costs are worse in the private rental sector, and ownership remains out of reach for many families – we should look to social and co-operative housing

- Only 70% of those renting privately are happy with their tenure, compared to 98% of owner-occupiers and 80% of those in social housing. This is understandable given the lower security of tenure, and rent costs having jumped from 7% to over 25% of incomes from 1980 to the mid-1990s.
- The housing benefits bill has swollen from 0.4% of GDP in the late 1970s to between 1% and 1.4% of GDP since the 1990s, and those who rely on it have faced regular freezes in its level over the last decade, irrespective of inflating rent levels.
- Meanwhile, rates of homeownership declined from 2005, as stricter mortgage conditions and higher house prices made purchasing a home less accessible.
- This report will focus on two alternatives, social housing, which is well established in the UK, and co-operative housing, which is more prominent abroad.
- Social housing is funded by the state, directly or indirectly, and provided at below market rate to typically lower income tenants, with the state or their proxies providing the subsidy.
- Cooperative housing gives residents democratic control over their homes, and security of tenure. It is delivered on a non-profit basis, so costs are often below market rates. Residents may own the property through shares, or ownership may sit elsewhere.

Lessons on alternative provision, in social and cooperative housing, can be learned from further afield, beyond English-speaking countries

- As found elsewhere in this series of reports on housing, other English speaking countries, such as Ireland, Australia, New Zealand and Canada, face similar issues. They have, not always consistently, recently started strengthening social housing stocks, but they are early in their journeys.
- This will report also, therefore, look closely at countries in Europe, where their history of social housing and co-operative housing differs clearly from that of the UK.

Despite Britain's relatively large social housing stock, the nature of its role and our private rented sector means that supply is too low

- 17% of the UK's households are in social housing, which is higher than everywhere except Denmark, Austria and the Netherlands in the OECD, but nearly half of the 31% of households who did so in 1980.
- Britain's relatively expensive private rentals and high inequality mean that the need to look at the housing concerns of those on lower incomes remains.

- There is a waiting list of 1.2 million families in England, 4% of the population and equivalent to a quarter of the total social housing stock the current supply is clearly unable to meet the amount of need.
- Social house building in the UK boomed in the inter-war and post-war periods of the 20th Century, providing necessary homes for much of the population.
- However, social housing has been a victim of market reforms. The shift toward private development and the advent of policies such as right to buy has meant across English-speaking countries, social housing stock has diminished.
- Acknowledging the housing crisis, governments across the Anglosphere have started to turn back to social housing development to help solve the crisis.
 - Much of the Anglosphere is still in early days of returning to social housing construction at scale, while there are some lessons to be learned even at this early stage, we also need to look to other countries

Rebuilding social housing requires adequate funding, reforms to planning and new forms of construction

- Funding is fundamental to delivering good social housing policy. Long term consistent and guaranteed capital funding, as in Austria, helps housing associations and developers to plan for the long term. A well-managed revolving fund (where surpluses from social housing provision are reinvested into a construction and development fund) as in the Netherlands or Denmark, boosts the potential to provide further social housing without as much capital investment. Limited profit housing associations and private investments could bring new capital into the sector. Countries with strong social housing sectors have effective planning processes.
- Careful and considered planning makes it possible to build on the greenbelt in Copenhagen, while still preventing urban sprawl. In Ireland and Victoria, Australia, accelerated approval for social housing developments could hasten what can be a very long process. Ensuring a minimum percentage of housing in all new developments is allocated to social housing ensures a constantly growing supply. Planning for social housing developments to be mixed use can feed into broader community development and regeneration projects. Rethinking building processes could make building easier and faster.
- Use of prefab and modular construction, as well as easy approval for "pattern book homes" could facilitate a faster construction process, that has local area buy in.

The UK makes less use of housing co-operatives than other English speaking countries, and far less than Scandinavia

- A cooperative is a non-profit and democratic organisation, that is controlled by its members. In the case of a housing cooperative, members of the cooperative are residents. While the basic principles housing co-operatives are universal, they come in a number of forms:
 - Residents in a housing cooperative have democratic control over their property, and may also own shares in the development

- There are differing levels of resident control and ownership between types of cooperative and community-led forms of housing
- In general, they combine security of tenure with rents that are more affordable than the private rental sector
- An upfront payment is required to access some forms; a share in a housing co-op could cost anything from a nominal fee to thousands or tens of thousands of pounds
- Housing cooperatives are far less common in the English speaking world than elsewhere in the West.
 - Co-ops make up only 0.2% of the UK's housing stock, with 0.6% in Canada, 0.3% in Ireland, 0.2% in New Zealand and 0.1% in Australia. The co-op movement is slightly larger in the US, at 1% of dwellings
 - Sweden has the largest co-op sector in Europe, at 23% of the housing stock
 - On average, 14.5% of the housing stock is co-operative in Scandinavia, with 8.7% in central Europe and 2.8% in Southern Europe

Co-operative housing has wide ranging benefits, for residents and government, but co-operative living is not for everybody

- Residents of co-operatives can enjoy greater security of tenure and lower rents than those in the private rented sector
 - Canadian co-op rents are typically two thirds of private sector rents, and have risen more slowly
 - UK research, albeit from 2009, found that 88% of co-op tenants were satisfied compared to 77% of housing association or council residents
 - Opportunities for skills development and leadership roles can aid residents in their careers, as seen with the experience of student co-ops
- However, they place demands on their residents to be involved in the running of the co-op which may not be suitable for every family; they are also typically mixed income and not financially accessible to all.
 - Only 20% of units in Zurich co-ops, though, are "earmarked for low-income people", with co-ops in general in the west being mixed income
 - Those on co-op boards also have power which could be used negatively, for example to discriminate against certain types of aspiring residents, if they are not run transparently
- From the government's perspective, housing co-operatives can be cheaper to maintain than social housing and can address a range of wider social goals, such as on skills development and social care
 - There is a paucity of research and data published on co-operative housing, but a 2003 study from Canada found that operating costs were 14% low cooperative housing compared to other non-profit housing forms. If this saving were applied in England, then £2-3 billion could be saved from social housing operating costs if they were run as cooperatives
 - Eight out of the ten studies on the topic found a positive link between cohousing and better health, and a study in Catalonia found an "improvement of emotional and social health" for co-op residents

• There are co-op models that can also address other social goals, such as social care, with examples of cohousing developments for older people

Governments support co-operative housing through legal changes, finance and funding, education and help with finding land

- The legal framework can be a help or a hinderance to co-operatives
 - Legal changes in Ireland are making it easier to set up co-operatives, with the Co-operative Societies Bill 2022 cutting the number of people needed to set up a co-op from 7 to 3
- Financing is often the biggest barrier
 - Grants, tax treatment and favourable loans can assist with the financing aspect of the project, as has been seen in France when the 'Mas Co-op' received a €2.07 million state-subsidised social rental loan
- Education and support are vital for community-led projects
 - The Canadian government combined funding with education to launch their co-op housing boom in the 1970s
 - The Welsh government is funding a body which advises and trains cooperative housing groups
- Finding land/a building can also be a challenge, especially if fighting on equal terms on the open market
 - Renters' 'Right to Buy' laws are taking properties from the private to the coop sector in the US, for example
 - Community Land Trusts and local institutions can be a good source of buildings and/or land for co-operative housing projects, as seen with the student housing co-op movements
- Governments have been taking more direct action, as well
 - The Canadian government included CAD \$500 million of grants and CAD \$1 billion of loans in its 2022 budget to building 6,000 co-operative homes
 - Social housing stock can be transferred from state ownership to cooperatives, as seen in Toronto and several parts of the US, although results have been mixed
 - Top down action to establish co-operatives can be less effective than bottom up, community driven initiatives

There are a number of policy changes the UK government can make to support social and co-operative housing

Social housing supply is dwindling, and both local authorities and housing associations are facing difficulties in growing the housing stock. To enable this growth, government needs to take definitive action.

• Government needs to put in place long term funding plans. Firstly, the government must commit to substantial upfront capital investment. The current system is insufficient, and the lottery system means places miss out. Ultimately, social housing should aim for a revolving fund model.

- Government should end the right to buy. Growing the social housing stock must also include maintaining the existing stock. Doing so can help to establish a revolving fund model, and it means that new construction is genuinely adding to the stock rather than trying to keep pace with the stock that has been sold off.
- Local authorities should review their planning processes, to ensure they facilitate and encourage social housing development. Up to date local plans, and agreed on pattern books for social housing can help to greenlight developments. National government should ensure that and ensuring there is a minimum portion of social housing in every development.

Co-operative housing is not likely to make a big impact on supply in the UK – currently they make up just 0.2% of housing stock – but they have potential as a 'third way' housing option between renting and owning, and for specific groups, such as students. There are a number of areas that the government can focus on to help stimulate the co-operative housing sector.

- Legal status and rights
 - 'Co-operative housing tenant' as full legal status. Government should embed cooperative resident rights and expectations in law, as homeowners and rental tenants already benefit from.
 - Social renters should be given a 'collective right to buy'. Government should give social housing tenants the right to increase their level of control over their properties if a clear majority of residents are willing to. This would be a staged process, taking on more responsibility and, eventually, collective ownership rights.
 - Private tenants should also be given a 'collective right to buy'. Give private renters the right to bid for their own property if it comes up for sale, and have priority over other bidders.
 - Improve understanding of co-operatives by regulators and local authorities. Some of those setting up cooperatives in the UK have faced barriers due to a lack of understanding of the model from regulators and local authorities.
- Funding
 - Establish a Co-operative Housing Lender, backed with a state guarantee, or give access to the Public Works Loan Board. Government should set up a lender, able to borrow on the bond markets and backed by a state guarantee to distribute loans to cooperative housing projects. Alternatively or additionally, give access for cooperative housing projects that will charge social rents to the Public Works Loan Board, which social housing projects can borrow from.
 - Re-establish the Community Housing Fund to give revenue funding to projects. The fund was discontinued in 2022. It provided vital revenue funding to enable cooperative housing projects to be designed, taken through planning approvals and managed.

- Land
 - Build a national database of state-controlled land that is suitable for housing. This could be done through extending London's 'small sites' database to the whole country, identifying places suitable for communityled development.
 - Give a first right of refusal on derelict buildings and publicly-owned land to community groups or those building social housing. Where possible, community-led development should be prioritised.
- Awareness and education
 - Make people and community groups aware of their rights, and the cooperative model. Once the financial and legal frameworks are there, rights should be publicised clearly to members of the public and community organisations.
 - Expand the network of community housing support hubs. Invest £6m to offer community support hubs in each region of the UK over a 5 year period.

CHAPTER ONE - INTRODUCTION

Security of tenure and costs are worse in the private rental sector, and ownership remains out of reach for many families – we should look to social and cooperative housing

Last week (April 2024) we published a report on the UK's private rental sector (PRS), 'Let down'. The PRS' scale has grown significantly, doubling as a share of households from one in ten in 1990 to just under one in five today. Private renters are less happy with their lot than other forms of tenure. About 70% of those in the PRS are satisfied with their tenure, compared to 80% of those in social housing and 98% of owneroccupiers.¹ The 'Let down' report focused on two aspects of this – renters' rights and rental costs.

Renters are subject to uncertainty. Their landlord may wish to move back in, or jack up rents, or, through Section 21, deploy 'no-fault evictions' where no reason needs to be provided to evict the tenant. The government is bringing back its Renters Reform Bill to parliament in May, but it seems that arguments from landlords that measures such as abolishing 'no-fault evictions' would hit PRS supply are causing the government to water down the bill. However, our analysis of places where renters' rights have been strengthened, in Scotland, Ireland and Australia, found that supply was unaffected.

Costs as a proportion of renters' incomes have increased, jumping from around 7% in 1980 to over 25% from the mid-1990s.² The removal of rent controls was a factor in this, but so was the loss of social housing stock, forcing lower income households into the PRS. Rents had been fairly stable as a share of incomes over the past decade, but the last two years saw rents accelerate, pushing some into housing stress, with incomes now catching up once more.³

Renters do have the right to dispute rent increases, but doing so risks even worse outcomes for the tenants. We suggested strengthening this system, tipping it more in the favour of tenants, whilst keeping an eye on how the rent control measures enacted in Scotland and Ireland impact costs and supply in the PRS.

For those on lower incomes, housing benefits are available. Their cost to the UK has risen from 0.4% of GDP in the late 1970s to between 1% and 1.4% of GDP since the 1990s. This correlates with the selling off of council houses since the 1980s though 'Right to Buy'. Housing benefit levels are capped based upon the Local Housing Allowance (LHA). This is set at the 30th percentile of rents in a given area, and uprated only periodically, leaving the level of benefits frozen for 4-5 year periods whilst rents continued to rise. Low income households in the UK are thus left with some of the highest housing cost overburden rates in the OECD. Over half (53%) of low income households spend more than two-fifths (40%) of their income on meeting housing costs.⁴

The private rental sector, then, is characterised by a lack of stability, high costs in recent decades, and difficulties for those on housing benefits especially when LHA is frozen.

Meanwhile, ownership, where security is strongest, peaked in 2005 at 71% of households in England and Wales. Since then, a tighter mortgage market, and rising prices have left property ownership out of reach for some, especially at the lower end of the income distribution. By 2021-22, around 64% of households were owner occupiers.¹

Excluded from owner occupancy, and facing unsatisfactory outcomes in the PRS, lower income households in particular are in need of alternatives.

This report will focus on two housing tenures: social housing, and cooperative housing. The definitions of these can merge at times, so we will lay out here the ones that we will use.

Social housing's development is funded by the state, directly or indirectly, which also covers some of the running costs, along with the contributions of the residents. It is provided at below market rate, and targeted and allocated according to specific needs. Often the housing is owned by some level of government, be it local, regional or national, but it can also be owned by private companies or housing associations, who are then state regulated. Where once, in 1981, as many as 32% of households were in social housing, now 17% are – nearly half of the peak rate.

Cooperative housing is more complex. Like other types of cooperative, housing cooperatives are run by and for their members, and are non-profit. Ownership of housing cooperatives can sit with the residents or 'members', for example through ownership of a 'share' in the overall property or organisation – these are often called ownership cooperatives. There are also 'rental cooperatives' where ownership might remain with a non-profit, but the property is run along the democratic, inclusive and participatory principles of cooperatives. They can be developed as private initiatives, by non-profit organisations or by governments. Some cooperatives, then, can be forms of social housing. Coops are uncommon in the UK – only 0.2% of households live in one – but can be widespread elsewhere. Nearly a quarter of Swedish households are in housing coops, for example.

As we will see in the analysis that follows, these forms of tenure can have benefits ranging from improved stability, greater affordability and strengthened communities. As long as people abide by the rules of a tenancy and keep up with rent payments, they can typically stay indefinitely.⁵ They may also be able to play a role in expanding supply – an oft cited, but debated goal as explored in our 'Dwelling On It' paper – just as social housing did in the early part of the 20th Century.

What is the level of need for these housing forms, and how can provision be best expanded, or improved? Similarly to other reports in this series on housing, we will look at the situation in the UK as well as asking what can be learned from across the English speaking world and Europe.

Lessons on alternative provision, in social and cooperative housing, can be learned from further afield, beyond English-speaking countries

This story of social housing is not unique to the UK. The same pattern of rapid development of social housing construction in the early and mid-20th Century, followed by market-based reforms and reduced investment in social housing can also be seen in many other countries. In this study, we particularly focus on Australia, Canada, Ireland and New Zealand. As English speaking, liberal market democracies, they share many of the same challenges that the UK faces in its housing sector, and so solutions found there are especially instructive.

These challenges include the rise and fall of social housing stock, private rented housing that squeezes some budgets to breaking point, and an increased need and rising demand for social housing. Each have also committed to growing their social and affordable housing stock.⁶ However, most of these countries are relatively early on in their journeys back towards social housing, so it may too be too early to draw strong conclusions about what works. As such we do also look beyond English speaking countries, many of whom also saw a boom in social housing in the early to mid-20th Century, and a subsequent dip in public financing from the 1980s.⁷ Unlike the English speaking world though, they have largely retained their housing stock and investment in social housing has not declined as dramatically. Social housing stock itself has therefore remained robust.

There are also countries who went down a route favouring cooperative housing alongside, or instead of, social housing as we see it in the UK. In these, and in places where cooperatives never previously took root, there are examples of governments seeking to support the cooperative sector to address housing needs.

While legal and housing traditions are different, and practices cannot simply be transplanted to the UK, other countries' experiences of alternative housing tenures may still provide lessons in effective delivery, funding and good practice.

Finally, while housing is an issue across the UK, it is a devolved matter, with each nation setting its own policies. Our focus in this paper is particularly on England, though the analysis and recommendations likely have implications for devolved governments too.

CHAPTER TWO – EXTENSIVE WAITING LISTS NECCESSITATE INCREASING STOCKS OF SOCIAL HOUSING IN THE UK

Despite Britain's relatively large social housing stock, the nature of its role and our PRS means that supply is too low

At its core, social or public housing uses the power of the state to directly address one of citizens' most fundamental needs – that of shelter, providing a viable alternative to either renting privately or homeownership.

The Addison Act in 1918 kicked off a golden age of council house building in the UK that stretched well into the 20th Century. On average, well over 100,000 were being built every year up until the 1980s. By that point, 31% of households lived in social housing. Since then, the stock has declined by over a quarter, and the share of households in social housing has fallen by nearly half to 17%, as sell-offs and lower investment see the population shift towards private rentals and ownership.

Clearly, social housing in the UK is in a substantially weaker position now, than it was in its pomp. Compare us internationally, though, and Britain is still a leader when it comes to state-owned or backed housing. That 17% is 2.4x the OECD average share. Only the Netherlands, Austria and Denmark have more dominant social housing stocks. Of English speaking countries, Ireland is similar, with 13% of households in social housing. Australia, New Zealand, the US and Canada, however, all have just 3.5 - 4.5% of households in social housing.

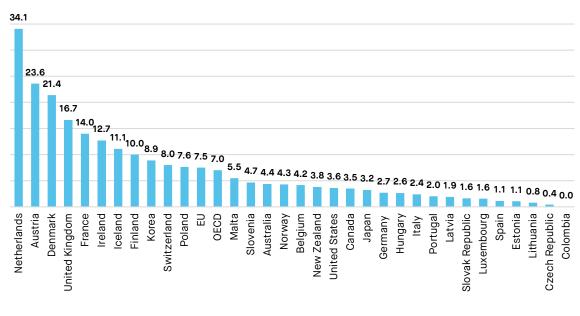


Figure 1: Social housing as share of total stock, 2020 or latest (ranging to 2011)

Source: OECDi

ⁱ The OECD data comes with a number of caveats, limiting the comparability between countries. New Zealand's data, for example, only includes central government funded social housing. Full Should Britain's relative position on social housing, then, be celebrated? Or should the scale of its decline be mourned? It is important to understand the different roles that social housing plays in different countries.

A 2002 study by JRF compared Britain's social housing picture to Denmark, France, Finland, Germany, the Netherlands and Sweden. It noted that "greater income inequality in Britain combines with tenure polarisation" to mean that those in social housing were markedly less well off than those in other tenures. These conclusions from 20 years ago still hold.

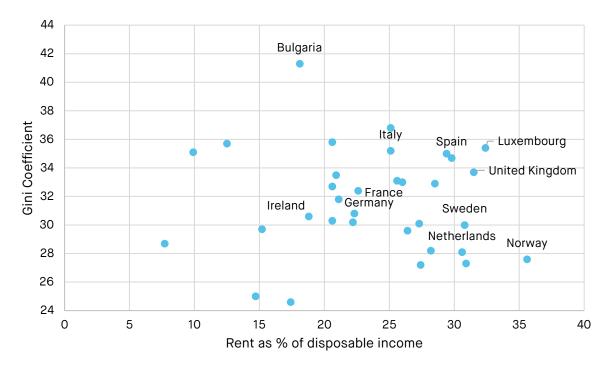


Figure 2: Rent costs compared to Gini coefficient by country, 2018

Source: OECD, World Bank

Britain still combines relatively high inequality with an expensive PRS. Figure 2 shows the UK, along with Luxembourg, facing this issue especially acutely. With an expensive rental market, those on the lowest incomes would struggle to manage. In Britain, especially as the stock has diminished, social housing has therefore focused on this group. The tenure polarisation by income, noted by JRF in 2002, can also still be seen, as Figure 3 illustrates. Those in social housing earn half of what those in furnished private rentals take home.

notes can be found at https://www.oecd.org/els/family/PH4-2-Social-rental-housingstock.pdf

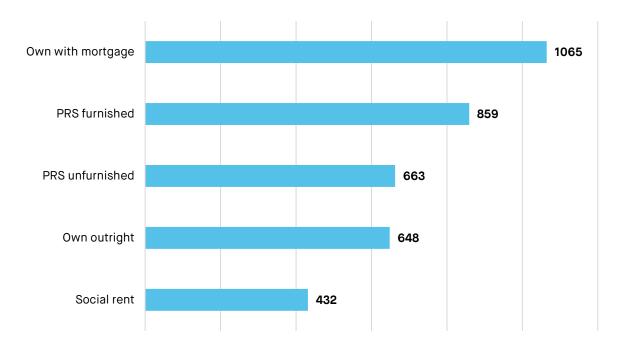


Figure 3: UK average weekly disposable income by tenure, 2019/20

Source: ONS

The UK, then, may have more of a need for intervention in the rental sector than some other countries. The role and place of social housing also differs from some of our comparison countries. In the UK, social housing can also be a home for life, as long as people keep up with payments and abide by the rules, there is security of tenure (although as we will explore in greater detail, fixed term tenancies for social housing are becoming more common).⁸ Social housing in Australia and New Zealand however has narrower eligibility criteria, and tenants are subject to regular eligibility reviews. If tenants no longer meet the criteria, their tenancy can end.⁹

The positioning of social housing in the wider housing market also plays a role. The OECD has highlighted that countries with higher rates of homeownership ted to have lower rates of social housing. For example, even before a shift towards social housing in the early 20th Century, Australia's homeownership rate was double that of the UK. In 1918 homeownership in Australia was over 50%, compared to the UK's 23%.¹⁰ Whilst in Britain the post war focus was on increasing the social housing stock, in Australia, policies to support greater homeownership were dominant.

These differences mean that Britain, then, should not take its relatively high social housing stock as a signal that supply is not an issue. A waiting list of 1.2 million, equivalent to 4% of the population in England, shows that this demand is not currently being met. This also represents 24% of the social housing stock, so a quarter of those in these properties would need to leave for the waiting list to be fulfilled. Whilst the waiting lists in the English speaking focus countries is smaller relative to populations, their smaller stocks mean that there would need to be an even greater amount of turnover of residents to fulfil this need. ⁴⁶

	UK	IRL	AUS	CAN	NZD
Waiting list as % of population	4.0%	3.2%	1.9%	1.5%	1.3%
Waiting list as % of social housing stock	24.0%	24.8%	42.9%	42.9%	33.9%

Table 1: Comparison of social housing waiting lists, 2022 or latest

Source: ONS, CBA, NZ Herald, Gov.ie, ABC

Social housing stock seems to be an issue not just in the UK but across the English speaking world. This chapter of the report will therefore take boosting social housing supply as its main focus. First we will look financing these projects, then planning, building and finally allocating new social homes. Across each of these, we will draw on examples of good practice from overseas. It is important to note, however, that while the UK can learn from other social housing systems, all have some flawed elements. Other social housing topics, such as decarbonisation, pricing and regeneration, will not be looked at in depth.

Social housing has been a key part of the answer for previous housing crises, but has been the victim of market reforms

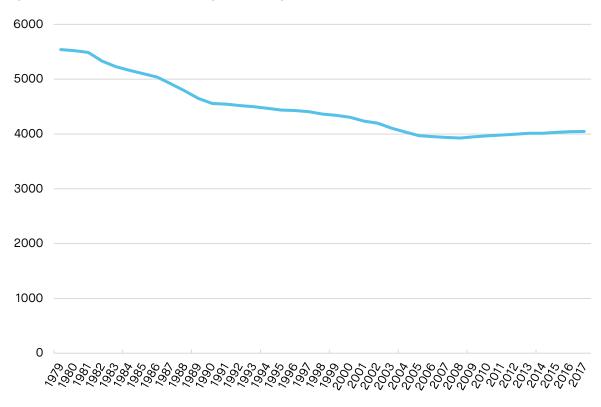
Despite significant investment in social housing over the 20th Century, supply of social housing is now lower than it was 40 years ago

In the UK there has been some form of social housing since the late 19th Century. In the late 1860s Liverpool Corporation developed the first purpose built council housing in the country.¹¹ In the 1890 the Housing of the Working Classes Act gave local London councils the power to build housing, before it was extended to other councils.¹² It really took off in the aftermath of the First World War.¹³ Spurred by concerns about overcrowding, poor conditions and the need to provide "homes for heroes", soldiers returning from the war, the 1919 Housing Town and Planning Act put local authorities at the forefront of housing provision, backed by funding to help build the promised homes.¹⁴ Even though the economic challenges of the 1920s meant fewer houses were built than planned, the seed for social housing had been planted.¹⁵ Further legislation followed, and in the interwar period, councils built over 1 million social homes.¹⁶

The second wave of social housing construction came in the aftermath of World War II with both the need to rebuild and again, to house returning soldiers. Peak housing construction came in 1968, when 352,000 houses were built in England, and 40% of this was built by councils.¹⁷ Nonetheless, an average of 126,000 social homes were built in the UK each year from 1945-1980.¹⁸ The share of social housing tenants grew as it became the "tenure of choice" for many working class families.¹⁹ At the same time, increased availability of mortgages and a rise in incomes meant homeownership became more accessible, and aspirational for more affluent parts of the population.²⁰

Neoliberal market reforms of the 1980s moved the government away from providing social housing itself, leaning more on demand side subsidies, such as housing benefits and rental assistance payments.²¹ There were theoretical reasons why this made sense. Tenants have more freedom over where they live, subsidies are flexible and can be quickly adapted to handle changes such as price increases. however, they are also vulnerable to market fluctuations.²² Rising rental prices in the private rental sector mean rental subsidies need to increase too, placing more pressure on the public purse. Homes which the government owns may take longer to build, but they do not experience the same kind of market fluctuation.

1980 also saw the introduction of "Right to Buy" (RtB), where council tenants could purchase their home from the council, at a substantial discount from market rate.²³ Councils were prevented from fully using the proceeds from the sale of homes, were limited in how much they could borrow, and received very little funding from the central government.²⁴ This has made replacing the homes that had been bought, very difficult, let alone build up the housing stock.²⁵ The 1980s also saw a shift in the provider social housing move from local councils to private not-for-profit organisations such as housing associations.²⁶ Housing associations could receive public funding to build social housing, and did not have the same restrictions on borrowing as local governments. However this still did not offset the decline in local authority building.²⁷ In 1996, the "right to acquire" was also introduced, which allowed eligible tenants to buy their homes from housing associations.²⁸





Source: ONS Dwelling stock by tenure, UK 2020 dataset

This, combined with consistently low public investment 30 years has meant the total social housing stock has been in decline since the early 1980s. In England, stock was about 5.5 million homes in 1979, but was a much reduced 4.1 million on 2021.²⁹ The extent of sales and demolitions of social housing, combined with under investment in social housing, means it is now much reduced from its former glory (see figure).³⁰

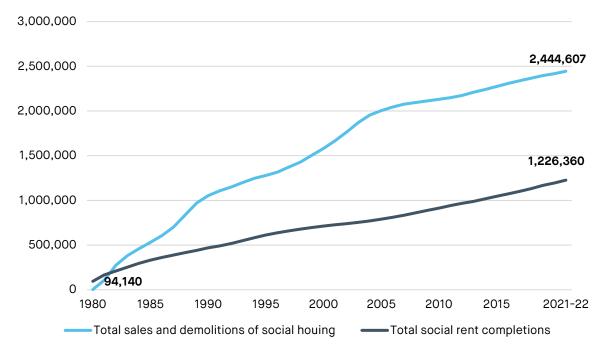


Figure 5: Cumulative social housing sales, demolitions, completions in England 1980 - 2022

Source: Live tables 678,684, ONS House building, UK: permanent dwellings started and completed by country

Social housing construction in England is a far cry from its heyday of over 125,000 units a year

As well as shrinking of the existing stock, completions of new social housing developments have also seen a dramatic decline. As shown in Figure 6, "affordable rent" housing (with rents typically around 80% of market levels, and as such not as cheap as social housing), have come to make up a large proportion of new affordable housing units.³¹

The UK housing review notes that England has been unique in seeing affordable rent as a replacement for social rent.³² For local authorities and housing associations, properties let at "affordable rent" levels can provide a higher level of income than those at social rent levels, in theory helping to support the delivery of more social housing.

As part of the introduction of Affordable Rent, capital grant supply subsidy for social housing constructions was effectively replaced with a revenue subsidy.³³ The housing association Network Homes stated that the move to a purely revenue based model has meant that housing associations needed extra financial strength in order to convince lenders to give them the capital to build more homes.³⁴

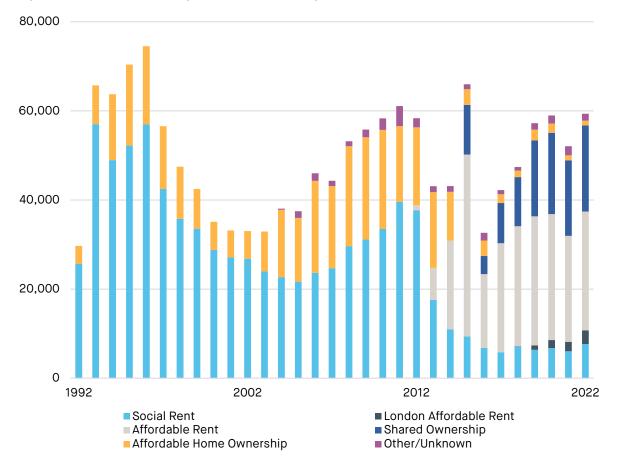


Figure 6: Affordable housing units delivered (England), mid 1992-mid 2022

Source: Department for Levelling Up, Housing and Communities, Affordable housing Supply in England 2021 to 2022

The most recent reports of social housing completions at time of writing finds that in 2022/23 63,605 affordable homes have been built, but only 6,561 of these are for social rent.³⁵

Allocation of social housing has also changed over time in response to demand outstripping supply

Alongside changes to construction, there have been changes to social housing allocation as well. The initial intention of social housing was to "house the working classes", although in the early years of social housing rents were relatively high, the poorest groups were under-represented.³⁶ Those on the lowest incomes remained in the private rented sector.³⁷ From around 1949 however, access became more liberalised and in theory it became open to all. Yet with demand exceeding supply, there were questions over whether middle incomes should be included, and indeed whether all working class households should have access to social housing.³⁸ Changes from the 1960s, including a focus on allocating social housing according to need and wider availability of housing allowances, seemed to contribute to a process of residualisation.³⁹ Eligibility for social homes became more and more restricted, often only available to those on the absolute lowest incomes and at the greatest disadvantage.

Residualisation has also been a response to demographic and economic changes. An aging population and the huge loss of manufacturing jobs from the mid-60s meant the average incomes of social housing tenants decreased and rates of unemployment among tenants increased.⁴⁰ By 2010, around 40% of all social housing tenants were in the first (poorest), income quintile, and around 70% were in the first and second quintile.⁴¹

There are arguments however that this process of residualisation has now plateaued and the UK is in fact undergoing a process of de-reisdualisation.⁴² Since the 1990s, there has been a convergence of income levels, employment levels and socioeconomic groups across social rent, private rent and homeownership.⁴³ There are now also equal proportions of households in poverty in social rent, as in private rent.⁴⁴

The need for social housing has been increasing, and it is now beyond crisis point

Estimates from the National Housing Federation find that there are 4.2 million people with unmet housing need, either through affordability, overcrowding, homelessness, unsuitable accommodation concealed households or other issues.⁴⁵ The waiting list for social housing in England has reached 1.2 million households, a 5% increase over two years.⁴⁶ Given that not everyone with unmet housing need actually applies for social housing and those whose incomes leave them just above the social housing threshold, but who still face challenges with affordability have to navigate and compete in the private rental market. They may either get by with the aid of housing subsidies, or struggling along with what they have. This in turn puts extra pressure on the private rental market, pushing prices up further.

Government spending on housing benefits and renter subsidies is also indicative of the need for more social housing. In 2020, The government spent 1.4% of GDP on housing benefits - more than four times the OECD average of 0.3% of GDP.⁴⁸ Between 2021/22 and 2024/25 the government is projected to spend £58.4 billion on supporting renters in the private rented sector.⁴⁹ Unlike social rent, that taxpayer money goes straight to landlords, there is no return on investment for the state.

Current issues and debates in delivering social housing

It is widely acknowledged that social housing stock needs to grow, and has needed to do so for some time.⁵⁰ Parties on both sides of the political divide agree they want to build more housing, but the question is how can growing the social housing stock be done well, and relatively quickly. It also needs to consider issues of funding, land availability, planning constraints and navigating difficulties with constriction.

Costs and funding

Delivering social housing of course does not come free, and funding for greater development is often cited as a major stumbling block.⁵¹ For years campaigners and advocates have highlighted to government the need for a funding model which is more supportive of social housing delivery, the existing capital grant funding for social housing development is considered to be entirely insufficient.⁵² In 2022 grant funding was projected to only provide 6% of social housing development funding.⁵³ Funding that is available is not even guaranteed, as local authorities and housing associations have to bid for it.⁵⁴

Recent loosening of restrictions mean local authorities can now borrow more to fund capital projects such as social housing construction.⁵⁵ In light of this change the Chartered Institute of Housing (CIH) asked local authorities if this affected their plans to build more social housing themselves. Most authorities do plan to increase their social housing stock, although there are stark differences in how much each plans to build.⁵⁶

Land and planning

The CIH report also identified land shortages and planning constraints as an obstacle for local authorities.⁵⁷ In particular, the ever increasing cost of land, and also poor availability of land to build on in the first place. Brownfield sites are the first preference for building, but are not always located where there is housing demand.⁵⁸ There is scope for more building on brownfield sites than we currently do, but .⁵⁹these are not sufficient alone to meet the scale of the challenge. An alternative is to build on greenbelt land, but this is extremely limited, with the National Planning Policy Framework describing building on the greenbelt as "inappropriate" except for in particular and very special circumstances.⁶⁰.⁶¹ Local Planning Authorities (LPAs) can review and consider changing their Green Belt boundaries, but it is advised that this can only be done in exceptional circumstances.⁶² Another issue (albeit not mentioned in the CIH paper) is that of height and density. While there is no national policy limiting how tall domestic buildings based on their height.

The planning system itself can be an obstacle. As we will discuss later in this chapter, while most planning applications are approved, it can be a long time between submission and decision. This is in part due to a lack of skilled planning staff within councils, which inevitably delays the subsequent construction of housing⁶³. Further, local authorities have been asked to develop local plans that set out the vision for future development of the area, which may resolve some issues of planning and land use, however many are out of date, and councils are not under an obligation to meet them, nor to include social housing provisions.⁶⁴ Planning reform across English-speaking countries will be reviewed in detail in the upcoming fifth instalment in this series, "Beyond the Comfort Zone."

Construction

Finally, labour shortages in the construction industry, combined with rising interest rates and rising materials costs has made building more expensive.⁶⁵ To add further

difficulty owing to the bureaucracy, red tape and time involved with the tendering process, contractors are not always interested in building for local authorities.⁶⁶

Doing social housing well means thinking cohesively about all aspects of housing policy

Overcoming the obstacles laid out above will take concerted effort and time, but lessons from other countries show there are multiple ways we can go about it.

Sufficient financing is fundamental to delivering social housing

Long term, consistent, and guaranteed capital funding

Substantial capital investment is necessary to build up the social housing stock. In Austria, there is consistent and guaranteed capital funding for social housing, paid for through a fixed portion of income tax, corporation tax and "housing contributions", paid by all employees.⁶⁷ This is gathered centrally by the Austrian government, and is then distributed across the country's nine regions. It is up to each municipal region or city council to determine how this money is spent on public housing, such as how much they want to invest into construction versus how much into demand side subsidies such as housing benefit, allowing them to prioritise their needs.⁶⁸ In Vienna, the funding is predominantly spent on subsidies for developers for social housing benefits). This certainty of funding for social housing allows for long term planning of what social housing to build and when.⁶⁹

The sustained capital investment in social housing in Austria has kept a constant quality supply of social housing stock, something which seems to have had positive knock on effects to the rest of the housing market. Almost a quarter (24%) of the population lives in social housing, but even more than that are eligible. As a result rent in the private sector has been kept low. Austria also spends a much lower portion of GDP on housing benefit compared to the UK (0.09% in 2019).⁷⁰

A revolving fund boosts the potential to provide further social housing

Social housing in the UK is often seen as a cost to government with little return.⁷¹ This is despite the fact that investing in social housing development is beneficial to the government.⁷² If retained and maintained, social housing will pay for itself in time, and then generate sufficient income to fund additional social housing projects. This principle is known as a 'revolving fund' and is popular across many European countries. In Austria, rent for social housing operates on a "cost based" system, that is rent is calculated, usually based on the cost of construction and maintenance of the property. Once the cost of construction is paid off, rent does not suddenly decline, residents are charged a set rent per metre squared, with an additional fee for maintenance, administration and so on.⁷³ This inevitably leaves housing providers with a certain surplus, which they are obliged to reinvest in further social housing development.

Similarly in the Netherlands, past investments in social housing development have meant that now housing associations can use the surplus from rental income to contribute towards new social housing developments.⁷⁴ Notably, Dutch housing associations no longer receive capital funding from central government, relying solely on their revolving fundsⁱⁱ and long term, low interest loans.⁷⁵ In Denmark the revolving fund is more centralised. Social housing is initially paid for through a grant from the National Building Fund, and mortgages from banks.⁷⁶ Once the mortgages used to fund social housing developments have been paid off, rents in social housing do not decrease, but instead remain the same with a substantial share then going toward the National Building Fund.⁷⁷

Limited profit housing associations and private investment could provide new funding vehicles

Most social housing development is currently financed through debt. On top of capital grant funding, local authorities or housing associations will take out a long term loan, such as from the Public Works Loan Board to help fund the development.⁷⁸ There is considerably less equity investment, however.

In Vienna, Austria, a portion of social housing is constructed and owned by limited profit housing associations. These associations are exempt from corporation tax, but in return, profits for stockholders are limited to 3.5% of nominal capital invested. All other surplus must be reinvested into construction, maintenance or renovation of housing stock.⁷⁹

In New Zealand, community housing is a form of affordable housing, and an alternative to public housing, provided by non-governmental, non-profit organisations.⁸⁰ To help with the development of community housing projects, social and philanthropic organisations have established a funding initiative called Community Finance.⁸¹ The core aim of the initiative is to support community housing organisations though impact investing and the purchase of community bonds. Bonds are issued for specific projects, and investors earn a fixed coupon rate for each project bond. This can vary depending on projects.⁸² In Australia the government has created the Housing Australia Future Fund, which is not a direct investment into social housing. Rather, it is a plan to put AUD \$10 billion into an investment fund, using the returns to finance new social and affordable housing. In theory, this should provide long term consistent funding for housing development, spending up to AUD \$500 million a year on social and affordable homes.⁸³ The hope is the fund will build 30,000 social and affordable homes within its first five years.⁸⁴ This use of the stock market to help fund social housing is innovative, but relatively untested, and given the fluctuations in stock markets, there isn't an annual consistent guarantee beyond the AUD \$500 million.

^{II} In 2021 Dutch housing associations collectively earned €17.7 billion in income, spent €14.8 billion on maintained, overheads, interest payments and taxes. That left €2.9 billion in rental revenue, which has to be reinvested in social housing stock. In 2022, social housing lettings in England earned registered providers collectively earned £15.4 billion across rental income and turnover, and spent £12.4 billion on management, maintenance and so on, leaving them with a little over £4 billion in surplus.^{II}

While it can boost the funding for social housing as a full funding strategy it risks falling short.

Separately, in some US cities, city governments are issuing social impact bonds to help fund affordable housing developments. The nature of the bonds mean they attract a wide group of investors. One of the advantages of the bonds is that, unlike traditional investing, investors already know the impact of their investment in advance.⁸⁵ Another is that these bonds provide safe and stable returns through rents.

A planning system that actively supports the development of social housing

In England, decision on any planning application is supposed to be decided in line with local development plans. On the surface, planning does not look to be much of an obstacle, in England, 80-85% of residential planning applications have been approved between 2010/11 and 2022/23.86 However, a recent review of the house building market by the Competition and Markets Authority has found that the planning system is stifling housebuilding.⁸⁷ One of the reasons is that the planning process is lengthy, expensive and complex, and time to make decisions is increasing.⁸⁸ The statutory timeline for review of application is 13 weeks, but in 2021 only 12% of applications were reviewed in this time frame. In most cases decision making takes over a year. Part of the reason for this, according to the CMA is that often public and political attitudes to development are expressed through the planning process, with residential development often being in the firing line.⁸⁹ While these attitudes should be accounted for within local plans, many plans are now out of date, and so there is heightened public engagement with the process.⁹⁰ As we will discuss more in the next section, negotiation with housebuilders to secure infrastructure contributions is also adding on time.

Accelerated approval for social housing developments could hasten the planning stage

Having local buy in for development Is crucial, but lengthy planning timelines can mean even if there is local support, there can be long delays before approval for building is granted.

In late 2022, the Irish government passed legislation which meant that councils would temporarily be able to develop their own social and affordable housing schemes on public land, bypassing the usual planning permission and public consultation processes required for council developmentsⁱⁱⁱ.⁹¹ The legislation is expected to take three months off the planning process.⁹²

ⁱⁱⁱ Subject to the housing development being aligned with the council's development plans, the land has already been zoned for residential use and there is no environmental assessment required

In the state of Victoria, Australia, developments with a cost of more than AUD \$15 million^{iv} can avail of a faster planning approval process if they include at least 10% affordable housing in the development.⁹³ Developers who want to benefit from faster approvals but not build the affordable housing must gift at least 3% of the building's value to Homes Victoria, who will then themselves spend the funding on social housing.⁹⁴ The effects of this are yet to be seen, however as we will expand upon in the next section, past examples have shown mixed results.

Mandating a minimum percentage of social housing in every development can ensure a constantly (albeit small) growing supply

While most social housing may be delivered through dedicated social housing construction, there can be "pockets" of social housing elsewhere. Use of a minimum requirement of social housing in every development helps to ensure that no matter where housing is being built, there is at least some reserved for those on lower incomes, and ensures that stock is always growing.

In England, the Community Infrastructure Levy (CIL) and Section 106 (S106) of planning legislation partially ensures some of this already happens. The levy and the legislation give local planning authorities (LPAs) the power to "choose to develop and charge a CIL on development in their area".⁹⁵ LPAs can for example, require developers to include a certain portion of affordable housing in residential developments, in order for them to be granted planning permission.⁹⁶ The precise proportion itself is not set in stone, but decided by the local planning authority.

S106 is effective, delivering approximately 47% of new affordable homes in 2022, however it is not without its challenges.⁹⁷ Firstly while local planning authorities set the conditions or contributions, this can be challenged by the developer with a financial viability assessment (FVA).⁹⁸ Developers can argue that their modelling shows proportion of affordable unite set by the authority makes the development not financially viable. Local authorities can bring their own FVA, and a negotiation ensues. Ultimately the financial decision is taken by the local authority but, as New Economics Foundation have highlighted, LPAs are often on the back foot, lacking the financial expertise to conduct the FVA and then negotiate.⁹⁹ New Economics Foundation have also pointed out that the use of the FVA means that construction of affordable housing is inherently tied to how successful private housing developments are, and demand in the wider housing market.¹⁰⁰ Areas with higher house prices and higher demand, will receive more S106 contributions, and conversely, areas with lower demand will get lower contributions. This leaves LPAs subject to the whims of the market, which shapes where social housing is delivered.¹⁰¹

^{iv} AUD \$15 million across Victoria, but AUD \$50 million in Melbourne

There are proposals to combine the S106 and the CIL into a single infrastructure levy, consisting of a flat rate charge, based on the final value of the developed.¹⁰² Some groups have expressed concerns about changing to a single and flat rate levy, arguing that it will damage social housing construction.¹⁰³ It has since been amended to address some of these concerns including a proportion of the levy contributions paid for in kind, with on-site affordable housing and the ability to revert to S106 if the levy is failing to deliver affordable housing.¹⁰⁴

Other jurisdictions have less flexibility than in the UK, requiring a fixed portion of all housing developed to be affordable, although this has had some mixed results. As we will see in the examples below, getting the incentive for including social housing in developments right is necessary if it is to succeed.

In Ireland, for example developers have been required to keep a portion of their site for social and affordable housing since 2000 (referred to as Part V). In 2015, Part V amount was reduced to 10%, and between 2015 and 2021, Part V delivered a fifth of all social housing provision, compared to 50% of all social housing provision delivered under S106 in the same period.¹⁰⁵ Changes to Part V in 2021 mean that 20% of all developments must now consist of social and affordable housing. Half of this must be social housing and half must be affordable housing^v.¹⁰⁶ There is some wiggle room, in that if the local area assessment at the time determines there is no need for affordable housing, the cost of this 10% can be returned to the developer. However the 10% for social housing stays in place. Smaller developments (four houses or fewer), can apply for exemptions.¹⁰⁷

In 2021, Montréal introduced regulations that required developers of large scale projects to have 20% social housing, 20% affordable housing and 20% family housing in each development. Failure to do so means they must pay a fine or gift land, which the city can then use for social housing development. In the two years since the legislation has been in place no affordable housing has been built, with every developer opting to pay the fine or gift the city land instead.¹⁰⁸ Theoretically, this can still help with the development of social housing. Yet critics of the Montréal model say this is unlikely, as the fines collected do not amount to a sufficient pot for even a single social housing development.¹⁰⁹

^v Affordable housing in the Irish context is either housing that is available for affordable purchase or cost rental. Affordable purchase means homes are sold at a reduced cost with the local authority taking stake in the home. The income of the purchasing household needs to be below a certain level to be eligible, and local authority can take a maximum of a 30% stake. Cost rental means rent must be at least 25% below regular market rents in the area

France appears to be a jurisdiction where a system of mandatory minimums has successfully ensured that social housing is continuously constructed. Rather than a strict developer requirement, the onus instead is on the municipality, who are the ones penalised if they fail to meet these requirements.¹¹⁰ Intended to reduce spatial segregation, legislation introduced in France in 1999 required at least 20% of housing stock in most urban areas to be social housing, with the target now set to rise to 25% for some municipalities in 2025.¹¹¹ The policy was focused more on affordable housing distribution, but it was also broadly successful in ensuring that areas that did not already have at least 20% social housing aimed to do so.

Planning for social housing developments to be mixed use can feed into broader community development and regeneration projects

To enhance the position of social housing and the role it pays in community development there is a strong argument for developments that are mixed use. Rather than social housing being just about the construction of homes, it can be instead shaped around the development of a community, with commercial, cultural and social activities and opportunities incorporated. Mixed use buildings are often a traditional part of urban neighbourhoods with common designs that allow retail on the ground floor and accommodation above.

Some social housing developments in Vienna have included shops, a kindergarten, offices and meeting spaces.¹¹² In Singapore, mixed use developments are viewed as important for creating a necessary sense of community, maintaining social cohesion and providing spaces for residents to mingle with each other.¹¹³ Singapore also shows that mixed use developments don't need to be concentrated in a single part of the building, with one development (Pinnacle@Duxton) using interconnecting bridges on the 26th and 50th floors of its buildings respectively to provide recreational spaces for residents.¹¹⁴ Both Singapore and Vienna also make use of central courtyards and green spaces which link all building in the development

Rethinking building processes could cut costs and time

Prefabricated and modular methods of construction

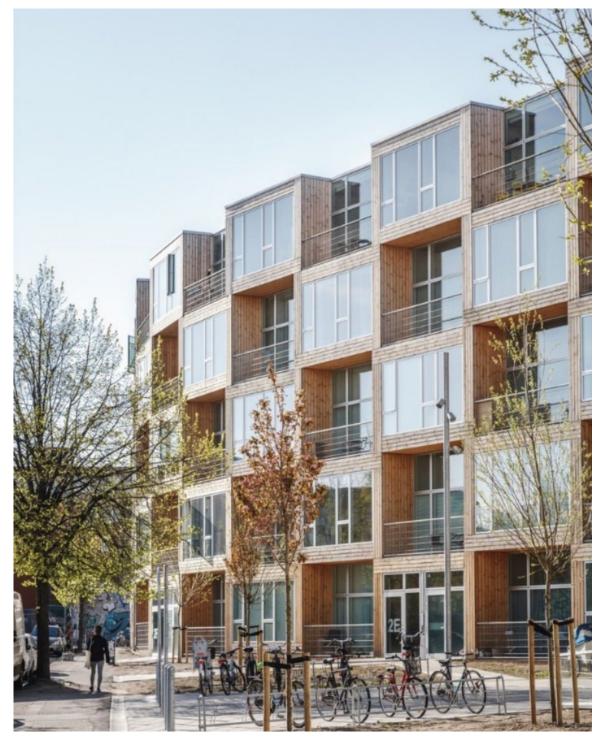
As stated earlier in the chapter, construction of social housing takes time and has become more expensive, this is leading to some social housing developments being postponed or scaled back.¹¹⁵ The construction industry is also facing a labour shortage, which can slow down projects. While there is a need to resolve the skills gap, it is also worth interrogating how construction itself can evolve. For example, use of more prefabricated and modular construction methods. These styles of construction methods consist of some level of construction in an offsite facility (e.g. structural frames, staircases, fully insulated, wired and plumbed wall panels), and are then shipped to site. The most advanced of these modules is a structural chassis with an internal fit out e.g. a fully assembled kitchen 'pod'. Using more prefabrication and modular construction could help to accelerate build times, and bring down costs.¹¹⁶ Using modular methods means a home can be built in as little as 20 weeks, compared to 31 weeks for an onsite steel framed home or 40 weeks for a brick and block home.¹¹⁷ Modular construction is not specific to the social housing sector, but given the budget constraints of social housing providers, and the need for quicker construction, use of these alternative building methods could be particularly useful in providing quality housing at a lower cost than traditional housebuilders.

Prefabricated construction has been used in England in the past to help address housing need. Post-war building was assisted with the use of temporary prefabricated structures, with 500,000 homes built with some element of prefabrication in the first 10 years after the war.¹¹⁸ While most have now been demolished, a few thousand remain standing.¹¹⁹ However, these structures were only ever meant to be a temporary sticking plaster rather than a long term solution.¹²⁰

Modular construction has changed over the past 70 years though, and its use now is more common for providing permanent homes, not just emergency shelter. While unlikely to entirely replace traditional building methods, there are still lessons that can be learned, and use of newer prefabricated models in housing developments is growing. Almost half (45%) of all Swedish homes are built offsite and 15-20% of new homes in Japan are built offsite.¹²¹ There are examples of its use in social housing across continental Europe. More recent uses of modular construction are carried out with longevity durability and sustainability in mind.

In Denmark, the Dortheavej project built 66 homes varying from 60m² to 115m² across five levels.¹²² The development was designed in keeping with the character of the areas, and commended for prioritising spatial qualities for the residents, while being strict on the budget for affordable housing.¹²³

Image 1: Dortheavej development, Denmark



Source: Rasmus Hjortshøj – COAST, via ArchDaily https://www.archdaily.com/903495/homes-for-all-dortheavej-residence-bjarke-ingels-group

Another example is the Jeruzalem Blok N social housing development in a heritagelisted neighbourhood Amsterdam, which consists of 86 apartments over 4-6 floors on a 1,800m² plot.¹²⁴



Image 2: Jeruzalem Blok N, Amsterdam, Netherlands

Source: Marcel van der Burg, via Studioninedots https://studioninedots.nl/project/jeruzalem-blok-n/

A final example is the Charriere MAO development in Paris. The development used prefabricated construction to help build a 35-unit apartment block, in a historic industrial part of Paris.¹²⁵ The development is mixed tenure, and mixed use, with both social and private housing, and a cabinet-making workshop on the ground floor.¹²⁶



Image 3: Charriere by MAO, Paris, France

Source: Javier Callejas via Metalocus https://www.metalocus.es/en/news/assembly-intangible-and-tangible-35-private-and-social-housing-units-mao

England (and the rest of the UK) could learn from these examples, for both social and private housebuilding. Use of modular and prefabricated construction methods is growing but it is still quite limited in this country, with developers continuing to favour traditional construction methods.¹²⁷ There is some movement on this front, however. Barrat Homes, the largest housebuilder in the UK uses modern methods and offsite construction in 27% of their homes, and are aiming for it to be 30% by 2025.¹²⁸ In Scotland, Cunninghame Housing Association are using modular construction to deliver 101 housing units. This will contain a mix of two-, three- and four-bedroom homes.¹²⁹

There are some limitations to modular construction in the UK. While the overall cost may be lower, the initial cost can be high.¹³⁰ Modular construction may be less flexible to design change and alterations than traditional construction.¹³¹ The fact that modular homes have to be transported from factory to the development site naturally limits their floorplan: the vehicles that transport the modular homes can only be so big.¹³² Developers in the UK are also hampered by a lack of suppliers, and the further the distance from manufacturer to site can cause issues with logistics, increasing costs.¹³³

There is also some doubt over the safety of modular construction. The National Fire Chiefs Council have expressed concern about the use of modern methods of construction (MMC), and how it performs. They are concerned that MMC buildings are "being designed, approved and built under a regulatory system that has been described and accepted by Government as 'not fit for purpose' even for traditional construction techniques".¹³⁴ They are particularly concerned about modular volumetric construction (where finished modules are stacked together onsite, to form a single building).¹³⁵

Easy approval/patent box design could make more housing easier and faster

Use of a designated local authority pattern book of pre-approved social housing designs could hasten the approval stage of housing construction.¹³⁶ This also has the advantage of allowing advance consultation and approval from residents, to ensure fit with aesthetics and local character, rather than going through each new development one by one.

Pattern books and pre-approved designs for housing exist in many municipalities across the US.¹³⁷ While many of the examples given are for single unit homes, rather than multiscale developments, the lessons learned remain the same. Lessons could be particularly helpful for designing social housing that fits into smaller plots, something which is becoming increasingly necessary in larger urban centres in the UK.¹³⁸

The government of New South Wales has announced they will be developing a pattern book for housing designs, and developers choosing these designs will have an accelerated pathway to approval.¹³⁹ A former policymaker in New South Wales described the need for templates as follows:

"They [authorities] have a limited budget and time and just want something that's fundamentally good, you need something gets a bit more repetitive and systematise. And where the costs are a bit less, particularly the design time. And I think going back to the sort of pattern book designs properly, might help to build design trust in the community there should be a building envelope, which is set for all the other ones. Again, give the option of going through to get out if you if you've got an appetite to anymore great but at least have a minimum thing. So we can do these things quickly."

Allocation

As outlined at the start of this chapter, one of the fundamental questions of social housing is who actually gets to live there. In England, eligibility criteria and allocation of social housing varies by local authority^{vi}, including income.¹⁴⁰ This flexibility is helpful, it means that each local authority can prioritise in accordance with need in their area. On the other hand, it does mean that there is no guarantee of consistency across local authorities and those who may not be able to afford private sector accommodation, may have no choice but to use it.

Mixed tenure developments and neighbourhoods can improve social cohesion

As stated earlier in the chapter, social housing in the UK once served a wide range of incomes, socioeconomic groups and employment statuses, but during and following a period of residualisation, eligibility for and allocation of social housing became much more limited.¹⁴¹ There is a risk in in limiting housing to only the most vulnerable, social housing becomes a safety net rather than a necessary housing solution. Poverty and deprivation can become entrenched, and there can be a negative effect on how social housing is perceived.¹⁴² Social exclusion can be heightened, and the stigma that is often associated in the UK with living in social housing is worsened.¹⁴³ By contrast mixed tenure developments can help with social cohesion, social inclusion and avoid spatial concentrations of poverty.¹⁴⁴

Much social housing in Vienna is of mixed tenure. Austria has traditionally had a more universalist model toward eligibility, firstly through the eligibility of a broad range of incomes, including some who are paying market rents and some who actually own the property. At the same time, acknowledging the role of social housing in helping more vulnerable people, the majority of developments are for those with greater housing need, with a set proportion reserved for the poorest.¹⁴⁵ The Netherlands operates a similar system, which requires at least 85-92.5% of social housing units to go to households in the target group, and below a particular income threshold. The remainder can be allocated freely.¹⁴⁶ Depending on what methods are used to determine how rent is set, mixed tenure can also result in different levels of rent contribution, helping to ensure that loans used to fund the developments are paid off.

Periodic evaluation of eligibility could have some benefits

One thing the UK does have in common with its continental counterparts is that eligibility for social housing is not reviewed on a regular basis, even though the circumstances of the household can change. This stands in stark contrast to some other anglophone countries. In Australia, and New Zealand eligibility is re-assessed annually, and if they are no longer eligible (e.g. income has increased beyond the eligibility threshold), the contract is terminated. Canada and Ireland do not evict if a sitting tenant is no longer eligible, instead a rent increase is imposed.¹⁴⁷

^{vi} Local authorities must give reasonable preference to people who are classified as homeless, those in overcrowded of unsanitary accommodation, people who need to move on welfare or medical grounds and those who need to move to avoid hardship. However, additional criteria is set at a local level and income threshold varies across local authorities. *Source: OECD Social Housing Policy Brief*

In the UK, social housing has come under greater conditionality. New tenants now have probationary periods and while previously had complete security of tenure, since 2012 social housing can be provided on a fixed term basis. In a paper exploring the use of fixed term tenancies (FTTs) in social housing, Fitzpatrick and Watts found that the majority of housing associations and almost all local authorities they spoke to now use FTTs for some or all new tenants.¹⁴⁸

On one hand, reviewing eligibility semi-regularly could result in slightly higher turnover of social housing tenants, and in theory open up spaces on the waitlist in a faster manner than waiting for people to move out of their own accord. This is the argument that has been put forward by government, that it gives local authorities greater flexibility and allocate social housing to those that are most in need.¹⁴⁹ However, this naturally views social housing as a more temporary and transitional dwelling, reserved for the very poorest on a more emergency basis, rather than as a permanent and secure home.¹⁵⁰ Security of tenure is such a crucial part of social housing and one of the advantages of secure housing is the ability and opportunity to put down roots and become a part of a community.¹⁵¹ As we referred to in our paper Let down on the private rented sector (PRS), one of the criticisms of the PRS by contrast is that the insecurity of the current system prevents tenants from putting down roots and fully developing a home.¹⁵² Moving social housing tenants out of social housing when they no longer "need" it may be theoretically helpful for the turnover of stock, but it could be incredibly disruptive. The only way it would be possible to minimise this disruption would be to ensure they could move into provide suitable and affordable private housing elsewhere in the community, which in the current housing climate, is unlikely at best.

At the time of Fitzpatrick and Watts' research the jury in England was still out on whether FTTs are "successful" or not, most social housing providers thought it was too soon to say.¹⁵³ Evidence from New South Wales in Australia meanwhile shows that while FTTs for social housing are renewed in the overwhelming majority of cases, the loss of security that comes with it negatively impact tenants sense of stability and belonging.¹⁵⁴ They also find that there is very little evidence that FTTs are actually effective at achieving aims like increasing social housing availability, addressing homelessness, promoting social mobility.¹⁵⁵

CHAPTER THREE – CO-OPERATIVE HOUSING IS ANOTHER ALTERNATIVE AND LESSER USED MODEL

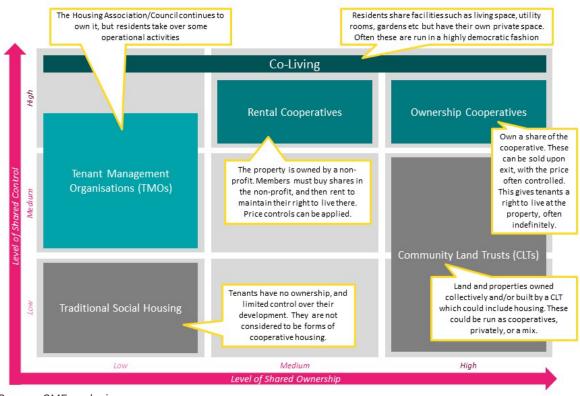
Housing co-operatives come in a number of forms

There are differing levels of resident control and ownership between types of community led housing

Homeownership is the ideal for many across the English-speaking world – the right to put your stamp on the place you live, the security that it's yours for as long as you want it, and as an equity store for later in life. Others, especially those on lower incomes, rent privately or socially. The social housing sector has better security of tenure than private renting, but people often lack the right to make simple cosmetic changes to their property, and can feel disenfranchised from the very place they call home.

The co-operative sector offers an alternative model. Co-ops have been around since at least the mid-19th Century, when Viktor Aimé established several properties in Berlin. A number of different forms of co-operative, or 'community-led' housing have developed since then. What they have in common is the principle that people should feel in control of their abode, and that sometimes it is better to fulfil your housing needs collectively rather than as an individual. This section of the report will explain the different types of housing co-ops, compare how prominent they are in different countries, evaluate their strengths and weaknesses, and look at examples of cooperatives around the Western world.

Housing co-operatives can be segmented based upon two characteristics: the level of ownership or financial stake that members have in the co-operative, and the extent of control that members have. Figure 7 uses the names which are common in the UK to illustrate this.





Source: SMF analysis

They are far less common in the English speaking world than elsewhere

Canada has the largest co-operative housing movement of our focus countries, but coops still make up just 0.6% of stock there, compared to 0.3% in Ireland, 0.2% in the UK and New Zealand and just 0.1% in Australia. In Sweden, nearly a quarter of households live in co-operatives, whilst one in six do in Poland.

In Canada, the co-operative model was supported as it was "a mixed income model" that could create lots of units of low income housing whilst building a workable community and reducing stigma, according to one expert that was interviewed for this project. Student co-ops grew in the 1930s and 40s, and there was major growth in the 1970s-90s of housing co-ops for families. Over the period, federal and provincial governments built over 80,000 dwellings.¹⁵⁶.

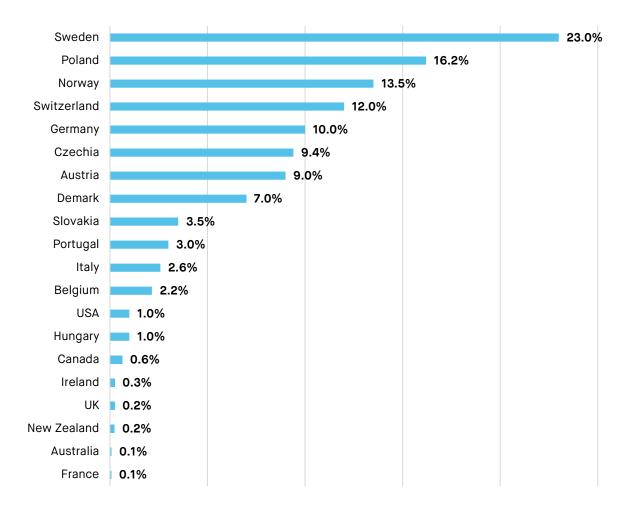


Figure 8: Co-operative housing share of households by country^{vii}

Source: CHF Canada, Tribune Magazine, Co-operative Housing International, ZHAW, NBBL, DST

There are stark differences by region, as shown in Figure 9 which takes averages for those countries included in Figure 8. Co-operative housing is much more widespread in Scandinavia and central Europe than other parts of the western world.

^{vii} Dates are for latest available data. UK:2022, Canada:2018, Australia:2023, New Zealand:2007, Ireland:2023, Sweden:2018, Denmark:2015, Norway:2020, Germany:2015, Italy:2017, France:2016, Switzerland:2017, USA:2018, Portugal:2019, Poland:2017, Hungary:2011, Slovakia:2017, Austria:2018, Belgium:N/A, Czechia:2017

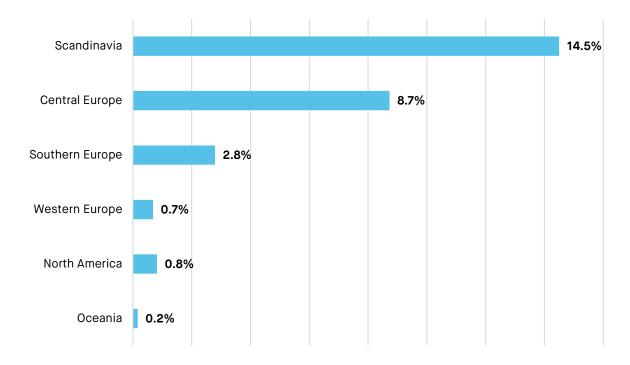


Figure 9: Co-operative housing share of households by geographic region, Data from 2016 onwards^{vii}

Source: CHF Canada, Tribune Magazine, Co-operative Housing International, ZHAW, NBBL, DST

There are benefits to co-operative residents, including greater security of tenure and more affordable rents than the private rented sector, although there are more expectations of tenants

SMF interviewed a number of people who work in organisations supporting and advocating for co-operative housing. A Canadian interviewee highlighted greater affordability as the "big thing", "because it's a not for profit". In Canada, co-operative rents are on average two-thirds those in the private sector, and the gap has widened. In many co-operative models, rent increases are more predictable, and residents have more of an understanding of the meaning behind them, as "they vote on whether to raise their rents or not" according to one advocate.¹⁵⁷

The level of affordability varies depending on the type and aims of the particular housing co-operative. Some aim to charge 'social rents', in line with the social housing sector, as the case study on Stirchley Co-operative Development shows later in the report. One British co-operative advocate commented on a housing co-operative that is able to charge rents at the LHA rate for shared accommodation because their property was bought at the bottom of the housing market in 2009.

However, co-operatives are often a mixed income proposition. The Swiss co-operative sector is large, and often cited as a model. But in Zurich, for example, only 20% of units are "earmarked for low-income people" resulting in a "wide income span" of people living in them. Residents need to purchase shares worth between 7,000CHF to 25,000CFH (around £6,000 to £22,500), with the state covering those of lower income residents.¹⁵⁸

Some of those involved with the sector suggest that this is intrinsic to the model, with one Australian housing co-operative advocate saying that "for a co-operative to be able to function properly, you need a bit more of a mixed income situation". This can result in "less stigma" according to a Canadian housing advocate, than social housing.

Studies have found co-operative residents to be happier with their housing situation than other tenures. A 2009 survey in the UK showed that 88% of co-operative tenants were satisfied, compared to 77% of housing association or council residents.¹⁵⁹

A leader of the international co-operative housing movement spoke of how you can "rent like you own" with co-operatives. They pointed to greater "security of tenure" relative to private sector renting, which means that "as long as you're paying your rent and you're following the rules, you know you're not gonna get kicked out".

One Canadian study found that three quarters of co-operative residents had "gained more friends and strengthened personal support" in their building, compared to under half of those in condos. Around half of co-op residents had "improved relationships with friends & neighbours" versus a third of those in other tenures.¹⁶⁰

Some studies have also found benefits to wellbeing. Eight out of the ten reports on the link between cohousing (a more shared-living form of co-operative) and health found a positive association.¹⁶¹ In Catalonia, a study found an "improvement of emotional and social health" due to co-operative housing in Catalonia.¹⁶²

An interviewee from the UK's student co-operative movement suggests that skills development is another major benefit to members:

"They've learned so many skills...they've renovated a basement, people have learned how to plumb...they put on training courses."

There is a flipside to the potential to skills development. As one interviewee from the Canadian co-operative sector acknowledged, getting involved with decision making and repairs is not the "kind of thing that everyone wants to do". Being in a co-operative places more of an expectation on residents that social housing and private sector renting. Not everyone has the time or desire to make that kind of commitment. Residents also lose some decision making power by being part of a co-operative. There are occasions when boards can block residents from selling their homes.¹⁶³

The power of resident boards can also be used in pernicious ways. Screening and selecting potential residents is often part of their role. Their decision making process can be opaque. Numerous examples of exasperated potential co-op residents can be found, with one who was looking in New York complaining they had "no idea" why they were rejected. This can give rise to accusations of discrimination, although co-operatives are barred from making decisions on resident applications due to race, gender or other factors by US law, and high profile cases have led to a "health fear of exposure" of discriminatory practices.¹⁶⁴

Case study: Stirchley Co-operative Development (SCD)

Stirchley is an area of South Birmingham, just around the corner from Bournville – the model village founded by the Cadbury family for their workers. It will soon be home to an ambitious mixed-use development combining 39 flats of varying sizes and commercial premises for 3 cooperative businesses: Loaf, a popular bakery; Artefact, a community arts space and cafe; and the Birmingham Bike Foundry. There will be a communal roof terrace and shared facilities such as guest bedrooms, community hall and a laundry room. Environmental principles are being baked into the construction.¹⁶⁵

The project is led by experienced housing advocates, some of whom were involved in setting up Birmingham's student housing co-op, in partnership with the businesses. It is expected to finish in Autumn 2024.

Stirchley was named as one of the best places to live in Britain by the Sunday Times in 2023, and voted as one of the coolest 12 places in the country by Time Out magazine. This popularity is seeing new outlets opening on a high street that was struggling following the financial crisis. Those involved with SCD cite this gentrification as a challenge for the neighbourhood, with residential and commercial rents increasing, pushing out existing communities and businesses – this was a key motivation for the project. A lot of the housing above the shops on the high street is also of poor quality, so this can provide an alternative. The rents in the SCD will be charged at social rent rates, plus a service charge.

These rents will cover maintenance and management, as well as a mortgage that supported around half of the building costs. The other half came from Homes England's affordable homes programme and EU Interreg NWE. There are significant costs before the actual construction stage, from design through to navigating the planning stage. This was supported by grants from Power To Change (via the Big Lottery Fund) and, vitally, the Homes England Community Housing Fund.

In an interview with SMF, one of the founders of the project cited the importance of a strong partnership with a housing association (RP) to get the project off the ground, especially when it came to acquiring the land. Revenue funding, to support the planning, design and other non-capital costs was also key, with the interviewee stating that "without the Community Housing Fund, this would not have been possible". Becoming a registered provider of social housing has also been a slow process, with some resistance from the regulator because of a lack of recent experience with a co-operative model that is "about people deciding to make their own change happen and their own homes".

From the government's perspective, they can be cheaper to maintain than social housing, attract less NIMBYism and can address a range of wider social goals

From the government's perspective, there are also potential benefits to having cooperative housing as part of the sector.

A 2003 Canadian study found that operating costs for the average co-operative unit are 14% lower than units in other forms of non-profit housing (i.e. social housing).¹⁶⁶ That study included utility costs, alongside administration, repair and maintenance. There is not likely to be much difference in the utility bills between co-operative and social housing, so much of that 14% must come from the other elements of operating costs. In England, operating costs are around £4,250 per unit a year excluding utilities.¹⁶⁷ With 4.4 million units in England, that equates to an estimated £18.7 billion of operating costs for social housing. If those were co-operatives, and found anything like the kind of cost reduction seen in the Canadian study, £2-3 billion could have been saved.¹⁶⁸

There are wider policy benefits, too. As noted previously, co-operative housing can lead to happier and healthier residents. Cohousing forms of co-operative may be effective in reducing social care bills for older people. New Ground Cohousing in Barnet, London, is a community for women aged over 50, helping them to live independently for longer.¹⁶⁹ Residents in a similar cohousing space in Paris describe a desire to "avoid ending up in a retirement home at all costs" and to "change the way people see old age" by "learning to live differently".¹⁷⁰

Co-operatives can have benefits to the local community. Levels of vandalism were found to be lower in co-operatives than other types of development in a 1995 US study.¹⁷¹ One interviewee described how student co-operatives in the UK really plug in to their local communities, going against the stereotype of students being bad neighbours. They offer training schemes to the community, and offer up their larger spaces for hire.

Boosting housing supply is a key priority for both major parties in the UK. There was a mixture of views as to whether co-operatives could be easier or more challenging to build than other forms of housing. One Welsh co-operatives advocate acknowledged that there is a "classic scepticism around community led housing", that it "takes such a long time because it's the community leading on it" and the consultations required. They counter that for housing associations or private it can take "just the same amount of time...except all you see is a plaque in a field" whereas for co-operatives you see the "nitty gritty of the whole process".

If community engagement is done well, it can ease the planning process. Stirchley Cooperative Development, for example, received hundreds of notifications of support for its proposal, which was more support than any other scheme the housing association had worked on. These notifications praised the sustainability of the project, its ability to regenerate the high street, that it was replacing a derelict site whilst fulling housing and business needs. There were a smaller number of objections than would be expected for a development of its scale, according to one interviewee. Confusion about what a co-operative is, and negative stereotyping can, conversely, make planning approval more challenging, said one UK-based housing academic.

Co-operative housing could provide a way to ensure that government investment in housing stock sustains affordable housing. One former Labour policy advisor described how a "fear [social housing stock] would just be sold off" at a discount at some point had held back plans to invest in social housing at scale. The Co-operatives, Mutuals and Friendly Societies Act 2023 will, following secondary legislation, allow an 'asset lock' to be baked into co-operatives when they are formed. If a government invested in independent co-operative housing, and embedded rules on affordability into an asset lock, this could prevent them from private sell offs.

Ultimately, however, co-operatives represent a small share of housing in the English speaking world. In terms of housing supply, none of the interviewees gave the impression that housing co-operatives could be the 'silver bullet' when it came to Britain's housebuilding targets. They pointed instead to its other features, such as being a middle ground between ownership and renting, their affordability, its community building benefits and skills benefits. A number of countries are finding ways to support the sector, as presented in examples below, to ensure that this alternative form of housing tenure is an option for those who want it.

Governments support co-operative housing through legal changes, finance and funding, legal changes, education and help with finding land

The legal framework can be a help or a hinderance

Legal changes in Ireland are making it easier to set up co-operatives

The Co-operative Societies Bill 2022 finally updated laws that had been around since before Irish independence. It cuts the number of people needed to set up a co-operative from seven to three – this lowers the barriers to initiating co-operative housing projects. It also cuts back some restrictions that co-operatives faced when garnering investment and gathering funds. The bill falls short of enabling an optional 'asset lock', which disappointed some advocates.¹⁷²

Financing is often the biggest barrier

Grants, tax treatment and favourable loans can assist with the financing aspect of the project

The French community-led 'Mas Co-op' in Southwest France was supported by "a €2.07 million (USD \$2.2 million) state– subsidised social rental loan". Such loans are often from a publicly-owned bank. Projects of this kind are also exempt from property and development taxes, some VAT and other levies.¹⁷³

In Germany, government-owned development banks offer similar products, although this is the "the only Federal state financial assistance available" to build co-operative housing. The loans have "low-interest rates for the new construction, purchase, and renovation of housing for self-use".¹⁷⁴

Umwelt Bank, which has a strong ecological and social mission, also helped to fund the Spreefeld housing co-op in Berlin. The bank receives a "steady, low-risk return" from its investment. The founder of Spreefeld, Angelika Drescher, an architect, said that "the continuous personal advice from [bank] employees" was a major additional benefit of the collaboration.¹⁷⁵

Education and support are vital for community-led projects

The Canadian government combined funding with education to launch their co-op housing boom

The 1970s were a good time for the housing co-op movement in Canada. The government provided "start-up funding and financing through mortgages" that were insured by an agency of the federal government. They also helped to set up "development resource groups" who would market the properties to potential residents and help them to understand what a co-op is, its benefits and the expectations on members.

The Welsh government is funding a body which advises and trains co-operative housing groups

The Welsh government pledged "a much greater emphasis on co-operative housing, which fits well with Wales' strong social history" when it launched its housing white paper in 2012, with a target of building 500 co-operative homes. These efforts are being led by Cwmpas, who assist co-operatives and social enterprises in Wales, and received state revenue funding in order to help catalyse the co-op housing movement.

A 2016 evaluation for the Welsh government looked at progress so far, dividing the work into two types of project: those initiated by housing authorities, and those that were community led. The community-led projects had a harder time finding/acquiring land than the housing authorities, who could use existing land stock or other state land. Finance was also more of a barrier for community groups, with them having to draw on a "patchwork of funding sources".¹⁷⁶

Finding land/a building can also be a challenge, especially if fighting on equal terms on the open market

Renters' 'Right to Buy' laws are taking properties from the private to the co-op sector

The "Rental Housing Conversion and Sales Act of 1980" has been on the books in Washington DC for decades, and the Community Opportunity to Purchase Act was introduced in San Fransico in 2019. In DC, 25 properties have been taken over by tenants in the last five years.

These give tenants the first right to purchase their building if it goes up for sale. They are given an exclusive window of time, to enable them to band together, secure funding, and work through the legal requirements. This prevents private developers with ready capital snapping the properties up. The residents can decide whether to run the property as a co-operative, or to keep it as a rental by assigning their rights to a different landlord.

Politicians in New York are campaigning for a similar right there. Their version would restrict tenants from transferring their ownership rights to a private landlord, and would provide funding to help tenants in their property purchases. There would also be stronger stipulations on keeping the new co-operatives affordably priced.¹⁷⁷

Community Land Trusts and local institutions can be a good source of buildings and/or land for co-operative housing projects

There are currently ten student co-operative housing projects running or in development in the UK. These were inspired by a well established student co-operative movement in the US. The Berkley student co-op, for example, was founded in 1933 and now houses 1,300 members.¹⁷⁸ The North American Students for Co-operation, a federation of student co-ops in the US and Canada, features nearly 50 different co-ops with 4,000 members.¹⁷⁹

Those student co-ops that have been able to get set up quickest have been able to draw on buildings from willing partners. The Brighton student co-op, SEASALT, leases its property from the Brighton & Hove Community Land Trust. The Edinburgh student housing co-op was able to acquire an old block of student flats that were being offloaded by Napier University through a long term lease.

Other student co-operatives are having to compete for suitable properties on the market with private developers. Their more complex finance arrangements, for example combining multiple loans and grants, means that they do not have the freedom to bid as quickly and as high as others. Working with stakeholders whose values might be aligned, but don't have the capacity to launch projects themselves, such as Community Land Trusts, local government, universities, and the church could help to get them land more quickly.

The Oxford Community Land Trust is also using their land to build co-operative homes, all to environmentally sustainable standards. In Liverpool, the CLT has converted ten council properties to co-operative housing, after "years of campaigning" to acquire the freehold.¹⁸⁰

The Community Land Trust model is being used in Ireland too. Since 2017, a group has been trying to establish the Irish Regenerative Land Trust to "decommodify land, develop food security, and achieve secure tenure and land access".¹⁸¹.

Governments have been taking more direct action, as well

Governments are directly investing in the co-op housing sector

As some governments took the leading role in building up their original co-operative stock, so too are they now seeking to create a second wind.

The Canadian government is making its first investments in co-op housing for 30 years. Announced in its 2022 budget, CAD \$500 million of grants and CAD \$1 billion of loans will be deployed to build an additional 6,000 co-operative homes.¹⁸² The Co-operative Housing Federation of Canada is helping to shape the programme alongside the Canada Mortgage and Housing Corporation, ensuring that those with expertise of the sector have a hand in designing the scheme. The funds are being reallocated from more general housing funding pots, so, net-net, this is not a new investment, but does demonstrate the Canadian government's interest in the co-operative model.

Social housing can also be transformed directly into co-operative housing

In 2012, Rochdale Boroughwide Housing (RBH) was formed, after a stock transfer from Rochdale Borough Council. RBH is the "UK's first tenant and employee co-owned mutual housing society". It has a large reach – 12,000 homes and £55m in revenue. That does not mean that the homes under its stewardship are now co-ops, but it does mean that tenants have a voice, alongside employees, on the board.

In North America, there has been the full transformation of properties into co-operative housing. The Atkinson Co-operative in Toronto is a prime example.

The 410 homes of the Alexandra Park housing project suffered from crime, often from outsiders, and a lack of community cohesion. A residents' association was formed, which was the kernel for the Atkinson Housing Co-operative after ten years of work. The change was supported by a large majority of residents in referenda, and 80% of households ultimately joined the co-operative. One interviewee who was involved with the project commented on the benefit in terms of security of tenure, and "something as simple as choosing what they wanted the fences to look like, and what kind of pots can go in front of their home".

There were also challenges in the process. The same interviewee commented on the "oppression, the racism" that was brought to the fore during the community engagement and conversion process. They cautioned that many aspects of the transition could have been done better – some financial support would have helped with community development and education. The housing authority was reticent to give up control and, ultimately, redeveloped the area around the co-op without engaging with Atkinson. They went on to say that the public health, crime, and community building potential of co-operatives means that public-to-co-op housing transitions should be supported where the residents want it.

Despite the precedent now being established, the experiment has not been repeated. The "level of partnership" government required hasn't come to fruition elsewhere – they have to be properly bought in. The residents, too, have to be committed, and maintain that engagement over a period of years, according to one Canadian cooperatives expert. Support and skills training is also crucial.

The US has, however, seen a number of social housing to co-operative conversions. In the 1970s, 30,000 abandoned and city-owned units were transferred to co-ops in New York City. UHAB, the body responsible, "believes in the value and replicability of its programme" and is "committed to passing on its expertise" domestically and internationally.¹⁸³

A paper by Rohe from 1995 reviewed literature on co-operatives, and their conversion from social housing. These painted a positive picture – more satisfied tenants, greater pride, lower maintenance costs, less vandalism. Their success, however, depended on the strength of management by the tenants, and the level of training/support they were given. Sometimes they would fail and end up back in state hands.

His evaluation of three contemporary US examples gave a more mixed picture. Of the three projects, one "faces serious financial problems", with the other two are financially sound but facing "substantial amounts of share payments in arrears". Satisfaction levels are also underwhelming, with those in one co-op "largely dissatisfied", with the other two "mildly satisfied". Poor board training, with the President of one lamenting that they were "totally unprepared for the task of managing a co-op" was one issue. Disrepair of the properties upon being handed over was another, saddling the co-ops with big refurbishment costs. His conclusion was that such initiatives are feasible, but the question is what are the right conditions for it to be a success.¹⁸⁴

Driving change top down can be challenging with co-ops

A report by Dr Yael Arbell and Dr Tom Archer evaluated the first year of the Housing 21 project, which aimed to offer cohousing as a "more empowering" living experience for "BAME elders" in Birmingham. They found a number of differences between Housing 21 and typical co-operative initiatives, such as it being "developer-led rather than community-led", fully rental rather than ownership based, the focus on marginalised groups and on "conviviality" rather than hewing close to self-management values.

A number of challenges arose during the process. Community engagement could be challenging when "introducing [a] new concept to marginalised communities", who could find it "confusing". They found that "residents struggled to commit to regular meetings, and generally had little enthusiasm for self-management or for capacity building towards this".¹⁸⁵ The design consultation was "unusual for housing association tenants" but "shorter than the average in grassroots cohousing communities".

Recommendations from the report included bringing in people from the "younger side of the 55+ spectrum", and more with experience of volunteering if they wanted to maximise the more 'cohousing' elements of the project.

CHAPTER FOUR – POLICY RECOMMENDATIONS

The government can take active steps to grow social housing provision

Social housing is an established form of tenure, but as we have highlighted, there is a notable supply deficit. As evidenced in Chapter Two, there is much the UK could learn from the social housing practices of other countries, in order to reverse the deficit and grow the social housing stock.

Have long term funding plans for social housing development

- 1. Commit to capital investment in social housing. While there are a number of ways to fund social housing in the long term, government will still need to provide substantial capital investment to help build up the social housing stock. Social housing providers are also required to decarbonise the existing stock, which puts and additional constraint on their finances, making the need for greater capital investment all the more urgent. The National Housing Federation estimates that over £14 billion a year is needed over the next ten years to bring the social housing stock even remotely up to an appropriate level, something which would only cover 44% of the costs anyway.¹⁸⁶ This is a substantial outlay, but a necessary one. It is worth remembering that more than this is already spent on housing benefits every year. These subsidies should not be cut, and spending on housing benefits will need to be maintained as housing stock is substantially built up, in the long term it will be possible to bring this cost down. as more social housing becomes available.
- 2. Aim for a sustainable revolving fund model, to fund social housing developments in the long term. As seen in Austria, the Netherlands and Denmark there are a number of formats a revolving fund can take. The principle of them remains the same: continuous reinvestment of surpluses into the social housing stock helps to support the ongoing construction of new social housing developments. England could perhaps most feasibly adopt the Dutch model, with local authorities and housing associations each operating their own revolving fund and surpluses from social housing remaining strictly in pots for further social housing development and maintenance.

End, or severely limit, the Right to Buy

Current policies of Right to Buy and Right to Acquire continue to deplete the remaining social housing stock. This prevents social housing from getting the opportunity to become an asset to the providers that built it. To achieve the revolving fund model, government should end right to buy or right to acquire. Alternatively government should, at the very least, change the conditions by extending the time period that someone needs to have lived at the property before it can be purchased, limit the reselling of the property to the private market or the right to buy not applying to homes built after a particular date. Scotland, Northern Ireland and Wales have all ended their own right to buy policies, to protect the remaining social housing stock.¹⁸⁷ The end of right to buy in Scotland was expected to protect over 15,000 homes from sale between 2016 and 2026.¹⁸⁸

Ensure the planning system facilitates and encourages housing development

- Make planning more amenable to social housing construction. Local authorities need to ensure that their local plans have been consulted on with the public early and crucially, are up to date. Local plans should ideally help resolve issues of land availability and land use, density of building, and provide a long term framework for how housing will develop in a given area. Earlier buy in from the community would allay fears of changing the nature of an area and concerns about local public services coming under greater strain.
- 2. Make use of pattern books for social housing development. Attached to the local plans, local authorities should adopt the practice of New South Wales and consult on including pattern books for local social housing design, and consider providing accelerated approval for housebuilders who choose to use designs in the book. As well as securing local buy in with the design of future social housing, accelerated approval could help to attract construction contractors who are put off by the time and red tape it takes for approvals to go through
- Mandate a minimum percentage of social housing in every development. Many efforts toward improving social housing will take time to deliver, but there are some more immediate actions that can be taken. For instance, section 106 should be revised, to include a mandatory minimum of all builds be social housing, by stipulating a minimum amount of social housing that will be in every development. The mandate should apply nationally, and act as a floor, rather than a ceiling for social housing development. Given social housing need is a little under a fifth of the population, but this is increasing, a minimum of 20% social housing in each development seems appropriate. If for any reason there is no immediate need for social housing in the area, social housing units can be rented to private sector tenants not in receipt of social housing benefit, and charged a market rent for the property. While this should not be the sole focus of social housing delivery, it will help to guarantee the ever increasing supply of social housing. Learning from the example of Montréal, it should not be possible to pay a fine to avoid including a certain percentage of social housing units in a development.

There are a number of ways that governments can grow the cooperative housing sector

Starting from a base of 0.2% of housing stock, co-operative housing is not going to be the answer to the UK's housing supply needs. It can make a contribution, but, unless a significant proportion of state funded building goes into the co-operative sector, as it had in Scandinavia or Austria, it is likely to remain a small share of the housing puzzle next to social rent, private rent and homeownership.

There remains, nevertheless, a case for expanding the sector, and making it as easy as possible for communities to establish properties of this form. Co-ops can be that middle option between renting and ownership – they provide security of tenure and greater control over the property than ownership, but can typically be accessed with a smaller initial stake than ownership.

Most co-operative developments in the countries examined are mixed income. Although rents are more affordable than private sector rents, because they are nonprofit, they are typically pricier than for social housing, because they are not actively subsidised by the state. The demands of a co-operative may also not be suitable for some families. As such, co-ops are not an alternative to pure social housing. They can play an important role, though, for lower and middle-income earners looking for a more stable and community driven option than private renting.

There is a suite of reforms that could unlock the co-operative sector as a mainstream, alternative form of tenure.

Legal Status and Rights

- 1. 'Co-operative housing tenant' as full legal status
 - Other housing tenures come with a set of rights. Leasehold or freehold homeowners, and rental tenants, all have a specific set of legal expectations. Those in co-operative housing do not yet enjoy that same status.¹⁸⁹

2. Give a 'Collective Right to Buy' to social renters

- As we have seen in the US and Canada, social housing tenants can band together to claim more control over the place that they call home. This is not a common practice, but the government should encourage a pilot to study the results of this in a UK context.
- Experts recommend a staged process:
 - Stage 1) Tenant Management Organisation: Residents elect a board, which takes control of managing household services, from repairs to rent collection on behalf of the landlord. Ownership and rent agreements remain with the Housing Authority/Council.
 - Stage 2) Non-Ownership Co-operative: A co-operative is set up. Members of the co-op now contract with the co-operative for their rent. The co-operative board gains greater control over the management of the building, including input into how units are allocated. Ownership remains with the local authority/housing authority, but the co-operative receives a long-term leasehold agreement.
 - Stage 3) Ownership Co-operative: Ownership of the property is transferred from the housing authority/council to the co-operative. It is asset locked to ensure that its affordable housing provision will be maintained (or grow), and to prevent sell offs of stock if that is desired.
- Each stage would only progress if it aligns with the majority opinion of those social renters in the property.
- As with the TMO programme, high levels of education would be provided to the residents and board, and community engagement and building support would also be required.

- During the pilot programme, and in any expansion of the scheme, local authorities/housing associations would be expected to monitor quality of provision and financial stability in the new co-operatives.
- Once properties become cooperatives, any surplus made during their running would be contributed back into the revolving fund for social housing.

3. Give a 'Right to Co-operate' to private tenants

- Private renters should have the right to bid for their own property if it comes up for sale, and have priority over other bidders.
- As in Washington D.C., tenants should then have the right to determine whether the property is managed as a co-operative or if rights are transferred to a different landlord.
- 4. Improve understanding of co-operatives among regulators and local authorities
 - The co-operative sector is currently small in the UK, and some regulators and local authorities are unfamiliar with the model. Guidance should be provided from the central government to these bodies that co-operative housing developments should be eligible to become registered providers of social housing.

Funding

- 5. Establish a Co-operative Housing Lender, backed with a state guarantee, or give access to the Public Works Loan Board
 - Acquiring capital is one of the greatest challenges for co-operative housing projects.
 - Where the projects are small, and run by community groups or SMEs, borrowing costs can be several percentage points higher than those that a housing authority could attain this can make projects unviable.
 - A lender, focused on co-operative housing projects, and able to borrow in the bond markets could funnel financing to these groups. If the lender had a state guarantee, the borrowing rates would be even more attractive.
 - An independent co-operative market monitor should be established to ensure that the projects being funded are viable, and that the Co-operative Housing Lender is on a sustainable footing.
- 6. Re-establish the Community Housing Fund to give revenue funding to projects
 - This was a grant programme that provided revenue funding for housing projects. This is necessary to enlist the planning consultants, architects, solicitors and anything else that is crucial when stepping through the design, planning and launch processes.

The fund ran from 2018 to 2022 and was then discontinued. By 2021, it was supporting over 650 different projects which would result in more than 10,000 more homes, according to a report from the Community Land Trust Network and Community Led Homes.¹⁹⁰ Revenue funding is critical for these projects, and the report calls for around £50m to provide further revenue funding to projects.

Land

- 7. Build a national database of state-controlled land that is suitable for housing
 - London has a 'small sites' database this should be offered by every local authority/regional authority.
- 8. Give a first right of refusal on derelict buildings and publicly owned land to community groups or those building social housing

Awareness and Education

- 9. Make people and community groups aware of their rights, and the co-operative model
 - The co-operative model is not well established in the UK, and many people are not aware of it, or do not understand it.
 - Once the financial and legal frameworks are there, rights should be publicised clearly to members of the public, and community organisations.
 - Campaigns should focus on particular subgroups for example to make older people aware of co-operative housing as an option, and a potential alternative to retirement homes.

10. Expand the network of community housing support hubs

- Invest £6 million in strengthening the network of support hubs established through the Community Housing Fund. This would enable a hub similar to that in London, which has budgeted around £100,000 for admin and event costs, to be established in each region of the UK for five years.¹⁹¹
- These will help to educate interested parties in how to set up and manage co-operatives, foster networking and best practice sharing.

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