

## The rise of collaborative housing approaches in England, France and The Netherlands (How) are national housing policies responding?

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**Publication date**  
2016

**Published in**  
ENHR 2016: The European Network for Housing Research Conference

**Citation (APA)**  
Czischke Ljubetic, D., Zijlstra, S., & Carriou, C. (2016). The rise of collaborative housing approaches in England, France and The Netherlands: (How) are national housing policies responding? In *ENHR 2016: The European Network for Housing Research Conference: Governance, Territory and Housing* (pp. 1-22)

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European Network of Housing Research - ENHR

Working Group on Collaborative Housing

Belfast, 27 June – 1 July 2016

**"The rise of collaborative housing approaches in England, France  
and The Netherlands:  
(How) are national housing policies responding?"**

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**Abstract**

*The current development of collaborative housing in a number of North-Western European countries responds, to a large extent, to a series of failures of both housing policies and housing markets, which have accumulated over the last decades. The latter represent the inability of 'formal' housing institutions (stretching across market, State and third sector) to satisfy the housing needs and demands of increasingly large and diverse groups of the population. In particular, a structural housing affordability crisis is broadening its effects to include not only the so-called 'traditional' housing poor, but also a variety of middle-income groups, especially following the 2008/09 recession and ensuing austerity measures. This begs the question on whether, and to what extent, national and local (housing) policies are connecting with bottom-up housing initiatives. To shed light on this question, this paper will critically assess recent policy developments in England, France and the Netherlands.*

Keywords: Collaborative housing, policy responses, housing institutions, self-organisation, collective action.

## 1. Introduction

Since the turn of this century many European countries are witnessing the (re)emergence of a range of alternative, self-organised collective housing forms. These take a wide variety of shapes, including Community Land Trusts (CLTs), co-housing, residents' cooperatives, ecological housing communities, etc (Carriou, 2012; Czischke, 2014; Lafond, 2012; Minora, Mullins & Jones, 2013; Moore & McKee, 2013; Moore & Mullins, 2013; Tummers, 2015). Common features include high levels of user/resident participation spanning the conception, development and management of the housing project, and the establishment of reciprocal relationships, mutual help and solidarity. The multi-dimensional nature of these projects requires the establishment of long-term collaborative relationships not only amongst residents but also between the latter and a wide range of external stakeholders. Hence, in this paper we adopted the umbrella term “collaborative housing” (Vestbro, 2010; Fromm, 2012) to encompass the wide variety of shapes that these projects can take internationally.

We posit that the current wave of collaborative housing responds to ever growing difficulties to access housing that have accumulated over the last decades and worsened by the Global Financial and Economic Crisis (GFEC), notably structural affordability issues, the long-standing trend towards socio-economic and tenure polarisation of the housing stock, mounting environmental challenges, demographic transition and the rising need for care, etc. In a situation where neither classical housing policies nor market supply have succeeded to respond efficiently to demand, some of these groups portray their action as alternative ways of providing housing, different from the institutional social and private housing sectors. While (still) modest in numbers, evidence shows that these initiatives matter in other ways, notably the potential for social innovation, greater democratisation, accountability, local environmental outcomes and social cohesion.

Because their common main feature is to include residents' participation, these experiences are often studied to analyse their practices. The trend in the literature is to focus on the social processes that involve new ways of conceiving, producing and designing their housing, on the intentions of these initiatives and on the different ways of living that are invented in the housing project (Jarvis, 2015; Labit, 2015; Korpella, 2012; Vestbro & Horelli, 2012). These initiatives are, for the most part, studied from the point of view of the inhabitants. But the way in which they interact with the public policy arena is rarely analysed and remains poorly researched. This paper aims to reverse the scope, not only to see how these residents' groups and associations try to link with public actors, but also to examine how public policies respond (or not) to these initiatives. To this end, this paper presents an empirical exploration of the types of policy initiatives that may enable, directly or indirectly, contemporary collaborative housing, as well as their shortcomings.

The paper compares three countries: England, France and the Netherlands. These countries are interesting to study because of two main reasons: First, in all three of them there are long-standing well-established systems of institutional social housing providers, who own and manage in the range of 17 to 32 per cent of the total housing stock in their respective countries. Second, while in none of these countries has there been a tradition of self-organised collective housing initiatives – unlike, for example, in Scandinavian and German-speaking European countries –, in all three of them a recent emergence of these types of initiatives can be observed. Table 1 provides a comparative overview of these features. In France, the law “ALUR” of 1 July 2015 gives legal recognition to “residents' cooperatives”, while in England, The Big Society and Localism agendas, and the Empty Homes Community Grants Programme have been adopted. In the Netherlands, the new Housing Act effective as of 1 July 2015 introduced new legal opportunities to form residents' housing cooperatives. We look at these policies and assess whether any meaningful differences and commonalities can

be found between the three countries. Methods include a review of academic and policy literature, and interviews with key informants.

Table 1 – Overview of the three country case studies

	<b>France</b>	<b>England</b>	<b>The Netherlands</b>
Mainstream institutional housing actors (regulated housing)	HLM organisations (cooperatives, public companies, social enterprises)	Housing Associations and Local Authorities (ALMO's?)	Housing Associations (hybrid organisations between state and market)
Relative size of social rental housing sector <sup>1</sup>	17%	18%	32 %
Trends in social and/or affordable housing	<ul style="list-style-type: none"> <li>• Trend towards residualisation of social rental housing</li> <li>• Increasing difficulties for middle-income households to</li> </ul>	<ul style="list-style-type: none"> <li>• Strengthening of longstanding residualisation of social rental housing</li> <li>• Increasing difficulties of middle-income households to</li> </ul>	<ul style="list-style-type: none"> <li>• Trend towards residualisation of social rental housing</li> <li>• Increasing difficulties of middle-income households to afford housing.</li> </ul>
Recent policy and/or legal tools for self-organised housing	Law ALUR (2015): "residents' cooperative"	<ul style="list-style-type: none"> <li>• Big society, Localism Act (2011)</li> <li>• Empty Homes Community Grants Programme (2012)</li> </ul>	Housing Act (2015): introduces the possibility of a "housing cooperative"

Following this introduction, section two presents the three country cases studies, structured in three sub-sections: point 2.1. gives a short introduction to the situation in each country; point 2.2. details the policy tools and frameworks that we have identified as possibly enabling the emergence and/or development of the collaborative housing sector in each country; lastly, point 2.3. provides an analysis of the interactions between the social processes (or collective action) and the respective policy frameworks. Section three presents a comparative analysis and section four provides a brief conclusion and possible directions for further research.

<sup>1</sup> Proportion of social rental housing out of total housing stock in the country.

## 2. Three country case studies

### 2.1. National contexts

In this section the case studies are presented. First the general background and development in each country is discussed. The following section addresses the framework that enables and the tools that support collaborative housing in each country. A third subsection discusses the interaction between the policies, framework and tools provided and the actual use that is made of them. In the last section, we use an analytical diagram that classifies stakeholders or actors in these developments in four types: the upper-left quadrant contains the government actors and the key laws and policies dealing with collaborative housing in that country; clockwise from there, the upper-right quadrant presents the market or commercial actors; the lower-right quadrant contains the third sector actors and the lower-left quadrant, the grassroots actors.

#### *England: Community-led housing and the ambiguous meaning of Localism*

The term ‘community-led housing’ is most frequently used in England to refer to a wide variety of collectively self-organised housing forms. Gooding and Johnston (2015, p.18) refer to community-led housing as a term commonly used to describe homes that are developed and/or managed by local people or residents, in not-for-profit organisational structures. The HCA - Housing and Communities Agency, the national body responsible for administering regeneration and housing programmes - defines community led housing as “a range of models and approaches with varying aims and aspirations. This includes Community Land Trusts, mutual and cooperative, cohousing, self build and others” (Homes and Communities Agency, 2011).

**Table 1**

#### **Community-led housing activity in 2015**

	Number of housing organisations active	Number of homes provided (total extant)	Number of new homes in development pipeline to 2018	Homes to be renovated/ brought back into use
CLTs	170	532	718	c.30
Cooperatives	836	169,000	≈ *	-
Co-housing	20	266	291	41
Self-help	170	2,750	0 **	n/a
* Some co-operatives are in the process of planning or developing new homes. However, numbers are small and data is not available. ** Some self-help groups interviewed referred to plans to develop new homes as opportunities arrive.				

*Source: Heywood, A. (2016)*

While the existence of co-operative housing in England dates back to the late XIX century, and the origin of large parts of the today housing associations is linked to community groups, some new forms have proliferated in the last couple of decades, such as self-help housing, CLTs and co-housing. Co-housing started to develop in the UK at the end of the 1990s. The movement has gradually built up momentum and there are now 20 built cohousing

communities, having produced 266 homes<sup>2</sup> and there are more in the pipeline (see Table 2). In the early 2000s in England the CLT movement, stemming from the US, took hold in England. Today there are 170 CLTs in England, half of which formed in the last two years. In 2006 to 2008, a National CLT Demonstration programme, led by Community Finance Solutions, with support from Carnegie UK Trust and Tudor Trust, supported a number of pilot projects. In 2010 the National CLT Network was established to support the growing CLT movement and advocate on behalf of CLTs. The National CLT Network launched as an independent charity in June 2014.<sup>3</sup>

As Heywood states, “(t)he profile of community-led housing has risen over the past decade, helped in part by the growing interest in localism, community activism and alternative housing ideas.” (2016, p.6). Indeed, the above developments coincided with the emergence of the Big Society and Localism political agendas in England in the 2010s. These have translated into policy approaches seeking to involve ‘communities’ in the delivery of social services at local level as part of the aforementioned trend towards State withdrawal from direct provision and/or funding. Localism consists of the devolution of political power to a range of ‘local’ organisations (including Local Authorities, Combined Authorities and Local Economic Partnerships) as well as renewed efforts to engage groups of citizens in aspects of government (e.g. Co-operative Councils, free schools and neighbourhood planning). Commentators (Jarvis, 2015; Moore & McKee, 2014; Mullins, 2012; Lang, 2015) have acknowledged that since the Localist Agenda was first coined in 2010, there has been a growing cross-party support for localism in England. However, Jarvis (2015) identifies two competing perspectives in the localism discourse. One is a generally positive view suggesting that new localism opens up new spaces for democratic practice (Healey 2007). A different, less positive view highlights the ambiguities of localism supporting neoliberal goals through an emphasis on citizen participation. This resonates with Lang’s view that localism reforms under the 2010-2015 Coalition Government in England “reveals two contradicting understandings of localism and decentralisation: On the one hand, there is a focus on efficiency and cost reduction, which is evident from the Localism Act itself. On the other hand, the localism agenda provides useful guidelines for strengthening local accountability”. (2015, pp.7-8).

### ***France: A convergence of interests between grassroots movements and political arena***

In France, public support toward what is called « habitat participatif » (participative housing) is plural, although the ALUR law (2014), which allows the creation of participative housing societies, is one of the most symbolic and visible measures. This public support has to be understood as the result of several logics, concerning not only the political sphere but also the civil society.

The adoption of this law takes place in a context of extending influence of citizens’ initiatives and ideas of participatory democracy. To respond to the “crisis of politics” which institutions are facing since the end of 1990’s (Bacqué, Rey & Sintomer, 2005), measures have been adopted to reform the democracy by introducing more transparency in the decisions and favouring the direct expression of the citizens. Their effects have been particularly clear in the field of urban and housing management, where institutions and housing associations have had to organise citizens’ participation (Blatrix, 2002, Blondiaux & Sintomer, 2002; Nonjon, 2003). Several political tools were set up such as the creation in 2002 of ‘neighbourhood councils’ in agglomerations with more than 80,000 inhabitants (Bacqué et al., 2005). Resident participation was also included in new procedures of urban planning and in urban renewal projects (2003). These ideas of democratisation still reach a large consensus in the political sphere although their political aim is interpreted in various ways. Depending on the issue concerned, it can be to democratise and modernise the State apparatus, favour the social link,

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<sup>2</sup> See <http://cohousing.org.uk/cohousing-uk>

<sup>3</sup> See <http://www.communitylandtrusts.org.uk/what-is-a-clt/history-of-clts>

introduce methods of management inspired by the new public management in the case of social housing institutions or guide the realisation of eco-districts (Blondiaux, 2008; Rui, 2010).

The growing interest toward participation in housing has also been triggered by the growing (and relatively new) difficulties faced by the middle classes to have access to a chosen housing, in a context of increasingly unaffordable market housing offer in big cities (Paris, Lyon) since 2000 and progressive residualisation of the social housing stock. These difficulties, combined with new environmental demands, contributed to the rise of alternative initiatives within anti-globalisation and environmental grassroots movements and activists, defending new forms of non-speculative, participative and ecological housing (Maury, 2009). Among these various and dispersed initiatives, two main associations have gradually emerged during the 2000s; one promoting the idea of self-development (building without the help of a professional developer), and another the idea of residents' cooperatives, which purpose is to create a new anti-speculative housing model (d'Orazio, 2012). However, lacking financial subsidy or access to land, these initiatives have often failed to build housing and have then tried very early to contact public authorities to gain support (Bacqué & Biau, 2010; Carriou and al., 2012).

Since the end of the 2000's, representatives of both the political sphere and (more or less organised) the grassroots sphere have begun to meet and discuss, first at local level thanks to municipalities' initiatives and then at a national level. The adoption of the ALUR law and the other political tools encouraging participative housing is the result of a long process of negotiation. It can be considered as a short-term convergence of interests between main grassroots associations on the one side and the Green Party, which came to government in 2012 for the first time (Carriou & d'Orazio, 2015). These new political actors gave militants of collaborative housing a hand-up to reach recognition and public support, in exchange of what they could legitimate themselves as new political leader able to manage the country and reform it with the help of citizens. In that sense, the law ALUR is not directly the expression of a neoliberal criticism against the Welfare, but that of a specific political group to modernise and democratise the institutions by inventing innovative insurance tools including civil society (for example the renewal of the cooperative principle).

### ***The Netherlands: a tradition or discourse***

Self-provision of housing is defined in the Netherlands, for example, as “where first occupants arrange for the building of their own dwelling and, in various ways, participate in its production” (Duncan & Rowe 1993; p. 1331), or by Priemus as “De particuliere opdrachtgever is een particulier die de woning voor eigen gebruik laat bouwen, in tegenstelling tot de private opdrachtgever” (the private commissioner is, contrary to a private enterprise, a private individual who has the construction of a house being done for its own occupation, own translation, Priemus, 1984, p. 7). Priemus adds that this can be done as a group and both from the private commissionership as from this “pooling of resources” many advantages are expected. To name a few: increase of control, increase of involvement, positive effect on environmental planning, lower project costs, create specific housing demands, raise quality level of of housing and of the area, etc. (e.g. Provincie Noord Brabant 2007).

The Netherlands has a history of participation in housing and stimulating participation in housing projects. Some (e.g. De Vreeze 1993) have argued that the origin of social housing in the Netherlands can be found in collaborative housing projects. The housing sector emerged from the collaborative approach towards a privatised and later a state organised system (Van Kempen en Van Velzen 1988, Priemus, Dieleman and Clapham 1999). Nowadays the

housing system can be described as a hybrid between state control, private institutions (housing associations) and tenant consultation (Czischke, 2014).

Tenant influence and participation in the state organised system has known different stages. The origin of social housing provision might have been collaborative, but shortly after WWII the state took full control over housing (De Vreeze, 1993). A focus on tenants returned with the stimulation of low-income ownership in 1953 (Elsinga, 2004). The attention shifted to “democratisation” in the 1970’s with collective private commissioned homes and restructuring leading to several additional measures and subsidies to stimulate home ownership for (mostly) low-income households. The management of (social) housing becomes the focus in the 1980 to 1990 period. The discourse addressed the options to buy and intermediate ways of managing housing: between rental and ownership (Elsinga, 2004). In 2001 the national government explicitly addresses freedom of choice in housing (VROM 2001), which should be reached with alternative management models (self management), and new variants in ownership contracts (Elsinga, 2004; Zijlstra, 2011). From the early 2000’s onward empowerment (Vos & Van Doorn, 2004) and/or emancipation (Bobbe & Leimerink, 2006) became the topic of discourse (Zijlstra, 2011). Empowerment was understood as including freedom of choice leading to increased control over one’s life. Tenure choice models such as “Te Woon” and alternative contracts were introduced (Gruis et al., 2005; Zijlstra, 2011). Around 2012 the topics were replaced by a discussion in parliament about the right to buy (Zijlstra, 2012, 2013; Zijlstra & Gruis, 2013).

More recently, a similar trend to English Localism can be observed in the Netherlands, with the political discourse emphasising the need to move away from a welfare society towards a ‘participation society’ (*participatiesamenleving*). In addition, there has also been substantial political interest for stimulating individual or collectively commissioned housing, partly in response to the dominant position of professional housing developers and associations. The discourse is gradually moving away from large-scale housing developments, and an aim for empowerment, self-provision, promotion and collaboration.

## **2.2. Policy frameworks and tools**

In this section we present the main policy frameworks and tools that have been developed over the last couple of decades, which can be seen as potentially or actually enabling collaborative housing forms in the three countries, respectively.

### ***England: Positive ‘soft’ impact but low ‘hard’ numbers***

The main tool of the Localism Agenda has been the Localism Act, which came into effect in 2011. As part of this, The Department for Communities and Local Government (DCLG) outlined a series of policies aimed at giving local communities new rights. These rights were expected to give community, voluntary and charity groups the opportunity to take the initiative on how local public services are run and planning decisions are made. These policies included the following: Community Right to Bid, Community Right to Challenge, Neighbourhood planning, Community Right to Build, Community Right to Reclaim Land and Design support for communities (see Box 1 for more details).

**Box 1****Localism community-led policies in England (2010-15)****Community Right to Bid**

The Community Right to Bid will give community groups the right to prepare and bid to buy community buildings and facilities that are important to them. It came into effect on 21 September 2012.

**Community Right to Challenge**

The Community Right to Challenge allows voluntary and community groups, charities, parish councils and local authority staff to bid to run a local authority service where they believe they can do so differently and better. This may be the whole service or part of a service. It came into force on 27 June 2012.

**Neighbourhood planning**

New neighbourhood planning measures allow communities to shape new development by coming together to prepare neighbourhood plans. They came into force on 6 April 2012. Neighbourhood planning provides a powerful set of tools for local people to ensure they get the right types of development for their community. Using these new tools, communities will be able to:

- choose where they want new homes, shops and offices to be built
- have their say on what those new buildings should look like
- grant planning permission for the new buildings they want to see go ahead

Parish and town councils or neighbourhood forums will lead the creation of neighbourhood plans, supported by the local planning authority. Once written, the plan will be independently examined and put to a referendum of local people for approval.

**Community Right to Build**

The Community Right to Build allows local communities to propose small-scale, site-specific, community-led developments. It came into force on 6 April 2012.

**Community Right to Reclaim Land**

The Community Right to Reclaim Land helps communities to improve their local area by giving them the right to ask that under-used or unused land owned by public bodies is brought back into beneficial use.

**Design support for communities**

We're supporting an industry-led review to help in putting together a cross-sector package of design support for communities.

*Adapted from: <https://www.gov.uk/government/publications/2010-to-2015-government-policy-localism>*

Despite the intention of the above measures to empower communities, in practice there has been limited take-up. Amongst the reasons for this, Lang (2015) posits that these community rights are not well known and local communities often lack the skills to use them effectively. Furthermore, Heywood (2016) found that these measures are limited by numerous external requirements such as the need for a referendum (for neighbourhood plans, for instance), or the right of the secretary of state to make an assessment. In addition, the umbrella organisations representing different types of community-led housing have also been crucial of these measures:

*The community right to build (CRTB) has been criticised by the UK Cohousing Network and the National CLT Network as overly complex and actually posing a 'disincentive' to community groups. In fact, by September 2014 only three community right to build orders had passed their independent examination. Many in the sector claim that the 2011 Localism Act misunderstands the way community-led housing groups emerge and evolve. Furthermore, it is said that the act does little to help build the capacity and expertise needed to prepare business plans in the first instance."*

(Heywood, 2016, p. 20).

Also as part of the Localism agenda, in 2012 the Department for Communities and Local Government (DCLG) made funding available to organisations involved in self-help housing through the Empty Homes Community Grants Programme (EHCGP). Self-help housing in England is defined as "involving local organisations procuring housing by means of bringing back into use empty properties to live in, organising whatever repairs are necessary to make them available" ([www.self-help-housing.org](http://www.self-help-housing.org)). The EHCGP ran from April 2012 until March 2015 and enabled community-led organisations to gain the finance needed to access and refurbish empty properties, either by leasing the properties from their owners or by acquiring them if that's an option.<sup>4</sup> The EHCGP targets organisations that are not registered providers of housing and that have much in common with community-led housing groups. The EHCGP has allocated just under GBP 50 million to 110 community-led groups over two EHCGP funding rounds.

Mullins and Sacranie (2014) conducted an evaluation of this programme and found that EHCGP funding has made a modest but key contribution to the need for some working capital to invest in acquiring properties and renovations to bring them into use. They found key to the success of the self-help housing sector in securing this funding was linking the aims of the sector with those of the incoming Coalition Government to promote 'localism' and to tackle empty homes. Furthermore, they highlight the role played by the organisation Self-Help-Housing.Org in mobilising and promoting solution to empty homes by non-registered providers since its creation in the 1990s. Another key policy lesson they draw is the need for a policy framework and funding practices that 'fit' with smaller organisations.

Overall, Lang (2015) as well as Mullins & Sacranie (2014) highlight a positive 'soft' impact of both the Localist and Big Society discourses in the field of community-led housing in England, while on the negative side, numbers have been rather disappointing. Amongst the criticisms are: the co-optation of community-led housing by political ideologies (both left and right), structural flaws in the wider housing system (are they enabling or hindering collaborative housing?) and the incoherence between different policies pulling in different directions. Another problem is the uncertainty created by policy discontinuity, which happens when different governments take sharp U-turns in their policy and funding objectives. Given the local and small-scale character of community-led housing projects, as well as their long-term characters, these policy discontinuities have a major impact on their outcomes.

### ***France: Many tools for little effects***

In France, before the ALUR law, the ways of supporting collaborative housing were very dispersed and diverse, depending mostly on the demands on local groups and on the specific actions of local authorities. The tendency is now to share experiences and build collective references to accompany the impulse given by the law. The main idea is to scale-up these experiences and create a more mainstream "way" to develop housing.

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<sup>4</sup> Source: [www.hact.org.uk/self-help-housing](http://www.hact.org.uk/self-help-housing)

Pioneer municipalities (Strasbourg, Lille, Montreuil, Grand Lyon...) have experimented with tools and new types of actions, often reinvented each time and tailored to local needs. The tools used more frequently are: providing land at low prices, call for building proposals on earmarked land and provision of professional advice to residents' groups. Faced with the growing interest on collaborative housing shown by other local public authorities (even at regional level), these municipalities are engaged in a process to federate their action in a dedicated network called "réseau national des collectivités". Their lobbying was instrumental in the process of adopting the ALUR law.

At a national level, following intense lobby by citizens and municipalities, the law ALUR<sup>5</sup> came into effect in July 2015 providing statutory recognition to this type of housing. It offers a juridical recognition to two new types of collaborative societies: the self-development societies ("sociétés d'autopromotion", people who develop themselves the production of their housing, without a professional to lead the building) and the cooperative societies, which open the possibility to create a new sort of tenure, which is neither social nor private (Devaux, 2015). The law also aims to provide greater clarity on the role that social housing organisations can play alongside residents' groups, by facilitating the possibility to produce the building.

This law means an important recognition of these experiences, but criticisms have already been formulated about its effectiveness (d'Orazio, 2012), in the sense that this text hasn't (yet) provided the funds or the insurance tools that could facilitate the boom of collaborative housing. Until now, grassroots associations and representatives of the housing ministry and local authorities have failed to convince the national bank dedicated to the funding of social housing ("Caisse des dépôts et consignations") to grant loans to residents' associations. Because they can't borrow for themselves, these groups have no other choice than to delegate the development of the housing to other housing providers. Social housing providers, and especially the historical cooperative branch specialised in social ownership, are the most often involved in these experiences. Results of these arrangements have to be balanced: although the commitment of these traditional providers is today the main way to build collaborative housing, it also questions the role left to inhabitants in the process. Some of the most publicised tools set up by the municipalities have also been criticised because of their reduced degree of effectiveness. The calls for citizen proposals on special plots of lands such as these launched in Paris, Lille or Strasbourg are very well known, but at the end of the process, only a few inhabitants are chosen.

### ***The Netherlands: finally a cooperation***

Few of the aforementioned discussions have led to actual policy changes or implementations of a framework or tools in the housing system. However, an important change in legislation with respect to tenant participation was the 1998 "Act on tenant-landlord deliberation" or "Tenant and landlord consultation act" (*wet op het overleg huurders verhuurder*, Staatsblad 1998). The act was evaluated by Kruijthoff (2008) and adjusted in 2009 by adding further aspects for deliberation (VROM 2009). In 2015, after the discourse addressing intermediate ownership contracts, emancipation, empowerment, the right to buy and the right to manage, the revised "housing law" (*woningwet*, Min. BZK 2015b) was introduced. The housing law became effective on the 1<sup>st</sup> July 2015 and contains new regulations concerning the core task of housing associations, housing allocation, governance and supervision, performance agreements (*prestatie afspraken*). It enforces the position of tenants by enlarging the influence on decisions beyond the deliberation act (Woonbond 2015). New opportunities for tenant organisations to be more involved in the general management of the housing

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<sup>5</sup> Law no 2014-366 of 24 March 2014 'Accès au Logement et un Urbanisme Rénové' - ALUR (Law for the access to housing and renewed urbanism, author's own translation).

associations as well as new legal opportunities to form residents' housing cooperatives are introduced in the housing law (Min. BZK 2015a). To enable the tenants to do so, the law introduces several tools. The Housing association has to provide the tenants that are willing to start a cooperation a "research" fee of 5000 Euro and 6 months of time to come up with a cooperation plan (like a business proposal). The tenants have to be with a group of at least 5 households within a physical structure that can be seen as a group. If the cooperative is established, the housing association has to provide a dowry of 5 years' worth of maintenance costs. This dowry is a "drawing right" and not a gift. The owners within the cooperative can claim maintenance costs during the first 5 years, but have to agree on the conditions with the housing association in the deed of purchase. Boxes 2 and 3 provide the translation of the relevant articles of the housing law.

### **Box 2 - Article 18a from the Housing Law 2015**

1. A housing cooperative is an association with the objective to support their members to provide autonomous management and maintenance of the dwellings they occupy (and their direct surroundings). In case the estate is divided in property divisions (as defined in artikel 106 van Boek 5 van het Burgerlijk Wetboek), the management and maintenance entails solely these living areas which are meant to be used by the members of the cooperative as a separate entity (unabated a regulation as in artikel 112 lid 4 van dat boek).
2. A cooperative can be started by at least five owners or renters of dwellings in each other's vicinity which can be seen as one entity either based on financial, administrative, constructive, urban or otherwise.
3. A cooperative puts a mechanism in place to deal with complaints and disputes.
4. A by-law (algemene maatregel van bestuur) provides further precepts for cooperatives.

*Source: Woningwet 2015 artikel 18a (translation by authors)*

The housing law (see Box 2) provides a first framework describing the nature of the cooperative. The "decree of accredited Housing Institutions" (*besluit toegelaten instellingen*, see Box 3) further defines the interaction between the housing association and the cooperative. The decree contains the provision to support the formulation of a business plan, and prohibits sale of the dwelling to others than the prospective cooperation members. The cooperatives' business plan has to include details on how the cooperative contributes to the maintenance and management of the housing complex and provisions for re-sale.

### **Box 3 - Article 2 from the Law of Accredited Housing Institutions**

1. At the time of establishment of the cooperative, the income of the majority of the members does not exceed the social rental income limit (article 16, first section, sub b.)
2. The cooperative has a business plan, which was put up for consultation with the housing association. The plan contains at least a description of how the cooperative will contribute to the maintenance and management of the dwellings occupied by their members. And, in case the cooperatives' objective is to contribute to maintenance and management after the dwellings have been bought by their members, a description of the sale mechanism of the dwellings.
3. The housing association provides when requested to the prospecting members of the cooperative (with the need to mention their addresses), once-only a financial contribution of at least 5000 Euro to draw up the business plan. If more than one housing association is involved, the request has to be made by the associations at the same time and each association will contribute its relative share of the 5000 Euro.
4. The housing association sends requests as indicated in sub-3 to the minister. The minister grants any

request to consult on the business plan.
<i>Source: Besluit toegelaten instellingen volkshuisvesting, artikel 2 (translation by authors)</i>

The cooperative's structure is based on individual ownership of the individual homes. For the prospective owners/cooperative members the same income limitations as for access to the social housing sector apply. For 2015, the income limit is set at 34.911 Euro annual income (Min. BZK 2015). With an income below 34.911, acquiring a mortgage is considered difficult and the mortgage height is limited (maximum 4.6 times the income, being 160.000 Euro, Nibud 2015). Due to need to become owner within a cooperative, the subjects upon which the cooperative can decide are limited. For dwellings that are part of one structure (that means that share (at least) a roof (e.g. multifamily homes) and/or are organised based upon a division deed) it is compulsory to have an owners association. This mandatory owners association has a legal standing (obligation) to manage and maintain the collective parts of the building (staircases etc., but structural elements as the roof, façade etc. as well). The collective parts of a housing complex are collectively owned by the members of the owners association, the owners of the deeds of division. As a result, the cooperative's members are obliged to be part of the owners association as long as they own the dwelling. This raises the question how the housing cooperative differs from the owners association: the cooperative doesn't necessarily contain all owners and is thus a subset within the owners association.

### 2.3. Interaction between policies and collective action

In this section we present a brief overview of how the above-described policies and tools have interacted with grassroots movements pursuing the realisation of collaborative housing in each country.

#### *England: Unintentional alignment?*

Despite the relatively high level of activity in the field of community-led housing over the past years in England, literature on the nature and role of collective action or social movements is rare. There are implicit and/or oblique references to the wide diversity of the sector, which hold different (and at times conflicting) aims and agendas. Heywood, for example, recognises that “[c]ommunity-led housing models and groups are by their nature local and disparate” and cites evidence from his report to show that “the sector and the four subsectors within it are diverse and have different histories and ambitions.” (Heywood, 2016: p.48).

This situation has made it difficult for a unified community-led housing sector to act on a united front vis-à-vis the policy landscape. Despite the attempt to create an ‘umbrella of umbrellas’ in the shape of the Mutual Housing Group, a clear and consistent common agenda has taken time to take shape.

With regards to partnerships with other institutional actors, Figure 3 attempts to show the wider policy and practice landscape, according to our four illustrative domains. Figure 1 provides an overview of the main types of community-led housing groups (and estimated numbers of) currently active in England, namely CLTs, co-housing groups, cooperative housing and self-help groups. We have located these in the “grass-roots quarter” of the diagram. Each of these types has an umbrella organisation that provides information to their members and represents their interests vis-à-vis external stakeholders. In our diagram, we have located these umbrella bodies in the “civil society” quarter of the diagram. Other actors in this quarter include vested institutions operating in the third sector, such as housing

associations. In the public sector quarter is central government (which has been a crucial actor framing community-led housing in the last couple of decades within the Localist agenda), and local authorities. Overall, there seems to be wide consensus in the sector in that “(...) the interest in localism and empowering communities creates new opportunities and allows for innovation and stronger alliances with local partners, including local councils and housing associations.” (Heywood, 2016, p. 3). However, there are a number of barriers for the sector to grow. For example “(...) many of the support agencies and partner organisations, such as local authorities, are struggling themselves [in a context of austerity measures and continuous funding cuts to local government]” (Heywood, 2016, p. 48). With regards to commercial actors such as banks and other lending institutions, there are different views about the relative merits of ‘ethical’ banks versus commercial banks when it comes to funding community-led housing projects. Mullins, for instance, found that in the case of the EHCGP lenders with a social purpose were not seen as particularly beneficial compared to commercial ones, as the former tended to be more risk-averse and required backing assets that community organisations didn’t have<sup>6</sup>. On the other hand, the fact of having government support did help the risk profile of the community groups vis-à-vis commercial lenders.

**Figure 1 - Collaborative housing actors in England**

STATE SECTOR	MARKET
(Localism, Big Society Agenda)  <b>Central government: DCLG</b>  - Localism Act (2011): guidelines and funding  - Empty Homes Community Grants Programme – EHCGP (HCA)  - Community Right to Build  <b>Local authorities</b> – Land, planning permission...	<b>(Ethical) lenders, banks</b>
<b>Community housing groups</b>	<b>Housing associations:</b> management and financial expertise, access to funds/subsidies, partnerships, etc.  <b>HACT:</b> ‘think-and-do tank’ promoting community-led housing through partnerships  <b>Locality:</b> lobbies and supports community groups with business model, financial viability, etc.  <b>Umbrella organisations:</b> Mutual Housing Group (Cohousing Network, the Confederation of Co-operative Housing, the Community Land Trusts Network, the Community Gateway Network, the Development Trusts Association, the National Federation of Tenant Management Organisations and the National Association of Self-Build Associations...)
GRASSROOTS	THIRD SECTOR

<sup>6</sup> Mullins, D. (2016) Intervention at the ESRC seminar on Collaborative Housing. London, 21 June 2016.

### *France: a tendency to institutionalisation and professionalisation of participative housing*

One of the best ways to understand the interactions between the different stakeholders involved in participative housing today is by focusing on the tendency to its institutionalisation and professionalisation, as it has been commented by scholars (Bresson & Tummers, 2014; Devaux, 2015; Carriou & D’Orazio, 2015). This new way of providing housing often associates professionals and public actors and tends to be modelled on “classical” housing providers’ practices. Although originally arising from bottom-up dynamics, participative housing in France has diversified, including also top down or “hybrid” initiatives, experimented by municipalities or housing providers like the earlier social cooperatives. This trend can also be noticed in the projects led by grassroots associations, who tend to put aside practices coming from the activist sphere (such as self-management, informal funding mutualisation etc.) and replace them by more professional ways of doing things. This development responds to the will to extend these experiences to a larger scale, but also to the difficulties in accessing land and funding. As explained above, groups of inhabitants have to seek for public help, what implies speaking the same language and asserting their expertise with local situations.

Due to these necessary partnerships with institutions, a double process can be noted in the way the grassroots associations of participative housing are now acting and interacting. First, we observe growing competences among the groups themselves. Mobilising skills that are close to those used by professionals appears as an implicit condition not only to be considered as a serious partner by funding institutions but also to keep control on the decision process and to better understand the public arena (Sintomer, 2008). Residents’ groups work also to ensure consistency between their arguments and those of public action, especially regarding general interest. Secondly, residents’ groups often reach out to professionals to enter into a dialogue with institutional partners. These professionals play an intermediary role and have just founded a specialised network. They are indeed playing an important role nowadays in the development of participative housing in France. This reflects the growing number of partnerships between institutions and grassroots movements and, as a consequence, the high dependency of these groups to gain support.

Frontiers between interests and practices of the citizen sphere, the public sphere and the professional sphere tend to become more and more mixed – without disappearing. But this convergence has also been severely criticised by stakeholders from each sector, who see it as a kind of distortion of the genuine nature of actions, interests and ideals of each of these spheres. Some of these criticisms concern the opposition of principles between social housing providers and grassroots movements, for example on the incomes limitations (obligatory in the social housing sector and not wished in most of collaborative housing projects), on the selection process of the inhabitants (allocation principle in social housing and co-optation in collaborative housing), or on the purpose of the project (do social housing projects and collaborative housing projects follow the same general interest?). This institutionalisation trend also tends to put aside the most militant amongst the residents in these groups (Sazama, 2000; Ganapati, 2010), who do not recognize themselves anymore as part of a movement that seems to them domesticated (Mathieu, 2007) and far from their day-to-day concerns.

**Figure 2 - Collaborative housing actors in France**

STATE SECTOR	MARKET
<p><b>Central government: housing ministry</b></p> <p><b>- ALUR Law (2015)</b></p> <p><b>Local authorities</b> – Land opportunities (mostly through competitions), planning permission, local subsidies (discounts)...</p>	<p><b>Banks:</b> French bank of public investment : Caisse des dépôts et consignations</p> <p><b>Other banks : credit coopératif...</b></p>
<p><b>Umbrella organisation:</b> coordin’action des associations</p> <p><b>Community housing associations :</b> Eco-habitat groupe, Eco-quartier Strasbourg, Les colibris, Eco-habitat nord pas de calais...</p> <p><b>Lobby associations:</b> Habicoop</p>	<p><b>Professionals</b></p> <p>Architects and intermediates specialised in guiding the groups (organised in a network RAP)</p> <p><b>Housing associations:</b></p> <p>social housing cooperatives (ownership)</p> <p>social housing associations (rental housing)</p> <p>. financial development</p> <p>. assurances</p>
GRASSROOTS	THIRD SECTOR

### *The Netherlands*

Since the 1990’s the topic of ‘self-provision’ and collaborative housing are only some of the focal points of national housing policies. The policy aim to move away from mass-produced housing opened a debate about ways to stimulate self-provision and provided the opportunity to experiment with alternative processes of housing promotion and delivery. The ministry of housing (VROM, 2000) aimed to increase the amount of self-provided housing in several years from 14% in 1998 to 30% in 2005. In fact the percentage dropped to 10% in 2009 (Boonstra, 2015, p.152) and as far as is known from studies remained at that level in the following years (Worms, 2016). The collaborative housing projects are seen as a part of the self-provided projects and thus take up less than 10% of the new construction. The introduction of a legal opportunity to become a housing cooperative in the housing law is a success for the main advocate (Duivesteijn, 2013) of the collaborative model. However, the amount of successful initiatives has been modest (if known at all) compared to policy ambitions so far. The regulations seem to precede the examples and can thus be regarded as “top down” implementations rather than “bottom up”.

In the subsection on framework and tools, three main issues were raised that might directly influence the creation of cooperatives:

1. Because the cooperative is based on ownership, both the income limit and the mortgage lending limitation impede the number of possible participants in the cooperative (Rozema, Meier & Van Dam, 2015). Rozema et al. further note that the housing association is not allowed to provide a loan backing to the cooperative or to sell below 90% of market value (ibidem, p.42).

2. The maintenance dowry isn't a gift, and cannot be used as a capital asset for the cooperative. Thus, the dowry doesn't help to fund a mortgage or pre-finance any other investments. In relation to the first issue, this raises the question if the cooperative members have enough financial capacity to do effectively manage the estate.
3. Overlap between housing cooperative and the owners association generates tension between topics and power division (or, identical subsets rendering one of the two useless).

Pointing at the limitations of a cooperative based on ownership, a group of scholars, practitioners and tenants (Bakker et al., 2015) describe two possibilities for cooperatives in addition to a housing cooperative based on member-owners, as established in the housing law, namely:

1. Management cooperative with housing association as owner and tenant members as part of the management structure, this can be compared with the English Right to Manage (#); and
2. Housing cooperative as owner of the properties and leasing occupancy rights owners or renting out to tenants, what could be compared with the Danish model (#).

Bakker et al. (2015) appeal on one of the recommendations of the parliamentary inquiry commission "experiment with alternatives for housing associations" (own translation of advice #18, Van Vliet et al., 2014, p.39). They point explicitly at other governance structures wherein tenants have more influence and the possibility to remodel housing associations. Experiments with other forms existed already. Van Grunsven a Noordegraaf (2014) are tenant-managers of the self-managed project "De Teil" in Rotterdam. Van der Ven (2015) describes the trials of three housing associations that delegated rental tenants in some of the owners association in which they have a stake. And Platform 31 (former SEV, who orchestrate housing experiments) has a programme on housing cooperatives that started in 2014, but progress is unknown (Platform 31, 2015).

#### **Box 4 – On Adri Duivesteijn and stimulating intermediate or collaborative projects**

One of the initiators of incorporating the housing cooperation in the housing law, former member of the senate Adri Duivesteijn, is driven towards enlarging possibilities for individuals to control their living environment. He wants to provide alternatives in between the traditionally bipolar housing market of owner-occupiers and rental tenants. His proposals go back to the mid-nineties when he proposed the parliament to "make home ownership possible for low incomes" (Duivesteijn & Van der Ploeg, 1996). And later places the possibilities for low incomes within a broader scope of "self-built and self-managed" housing (Duivesteijn, 2013). Duivesteijn draws on experience from the municipality of Almere, which has been experimenting with self-built housing as well as with collective private commissioning (CPO). For both, a financial scheme of backing loans for low incomes has made self-building as an individual or collective more achievable. The system of backing a loan had been found in earlier experiments with low-income ownership as well (Elsinga, 2004; Zijlstra, 2011). Zijlstra (2016, to be presented at this conference) presents some project descriptions (including several examples from Almere) that have been tried as intermediates. The descriptions illustrate that the experiments aim to encourage self-provision in various forms, be it self-promotion, client orientation, catalogue building, or self-built.

To conclude, the new housing law enables starting a housing cooperative for tenants. However, the cooperative form based on ownership and regulations about access, limit the aspects that the cooperation can control and the number of tenants that can join. Further limitations are found in the form in which the dowry from the housing association is arranged. The trajectory of the discussion of low-income ownership and participation in housing might explain the choice for a cooperative based on ownership. Considering the limitations, further experiments and changes in the law could improve the possibilities of collaborative housing

beyond ownership. So far, the implementation has known a slow start due to some limitations. These blockages need to be removed first in order for the framework to prove its added value.

### Figure 3 - Collaborative housing actors in the Netherlands

STATE SECTOR	MARKET
<p>(Participation society)</p> <p><b>Central government: ministry of BZK</b> (former VROM)</p> <p>-consultation act (1998)</p> <p>-Woningwet (2015)</p> <p>-legal opportunity to form a housing cooperative</p> <p><b>Local authorities</b> – Land dispersal, planning permission, local subsidies (discounts), ...</p>	<p><b>(Mortgage) banks, project management and support firms, real estate agents,</b></p>
<p><b>Owners association</b> (obliged by law for apartments)</p> <p><b>Social housing tenants organisations:</b> Woonbond, local organisations</p> <p><b>Social rental tenants</b></p> <p><b>Housing cooperatives</b> (tenants who bought a dwelling)</p>	<p><b>Housing associations:</b> support, subsidy, time, dowry, ...</p> <p><b>Locality</b></p> <p><b>Umbrella organisations:</b> Aedes, VvE belang, ...</p> <p><b>Experiment organisation:</b> SEV/Platform 31</p>
GRASSROOTS	THIRD SECTOR

### 3. Cross-case analysis

The information presented for our three country case studies shows different dynamics in each case. Table 3 provides a comparative overview of our main findings in terms of context, types of policies and tools and type of process.

On the one hand, in France and England policies that can potentially enable collaborative housing are the result of a confluence of developments in the political and grassroots arenas, respectively. In both countries, as we have seen, since the early 2000s certain aspects of their respective political discourses have aligned closely with the agendas of social movements seeking greater user involvement in housing. However, the nature of these alignments shows distinct features in each case. In France this is the result of a pragmatic convergence of interests between the citizen's groups and some newly elected representatives of political sphere towards strengthening democratization, mutualism and social innovations. In England the alignment responds to a more ambivalent situation. As explained earlier, the Localism discourse carries a double meaning, mixing a Neo-liberal agenda to reduce the scope of government through responsabilisation (Foucault, 1991) with a stated aim towards citizen's empowerment and decentralization. In other words, the opportunities that Localism presents for collaborative housing to flourish are not (necessarily) purposely geared towards greater democratization, but rather respond to an economic-technocratic rationale.

In the Netherlands, on the other hand, opportunities for the formation of cooperatives provided in the new Housing Law was the result of a political discussion, which took place within the framework of a wide-ranging drive towards the modernisation of the housing sector and the dynamics on the housing market. This stems from a long lasting discourse about (individual) empowerment, increase of control, and democratisation. The housing market as a whole is being “pushed” towards providing more choice and control for individuals since the 1990’s. Within this context, one politician led the specific initiative on cooperatives with a ‘vision’ for greater empowerment of social housing tenants. Hence, it could be said that while this can be seen as a tool to widen the options of tenants it is disconnected, at least in its origins, from a grassroots movement.

**Table 3 - Overview of policies supporting collaborative housing in England, France and the Netherlands**

	France	England	The Netherlands
Context / Origin	<ul style="list-style-type: none"> <li>• Democratization, mutualism, social innovation</li> </ul>	<ul style="list-style-type: none"> <li>• Big Society, Localism Agenda</li> </ul>	<ul style="list-style-type: none"> <li>• ‘Participation Society’ discourse</li> </ul>
Type of policies / tools	<ul style="list-style-type: none"> <li>• Law ALUR (2015)</li> <li>• “Residents’ cooperative”</li> <li>• Local tools: call for proposals, land disposal, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• Localism Act: Community rights</li> <li>• Empty Homes Community Grants Programme (EHCGP)</li> </ul>	<ul style="list-style-type: none"> <li>• Legal opportunity to “claim” a cooperative in social housing estates</li> <li>• Additional support to start up consisting of a “investigation” subsidy, 6 months of ‘organisation’ time, and a dowry for future maintenance</li> </ul>
Type of process	<ul style="list-style-type: none"> <li>• Convergence of interests between citizens’ and political arena</li> <li>• Public tools do not respond to practical difficulties: funding, assurance and land</li> <li>• Tendency to institutionalisation</li> </ul>	<ul style="list-style-type: none"> <li>• Top-down and bottom-up struggle to align</li> <li>• Availability of various policy instruments and funding but piecemeal policy approach</li> <li>• Fragmentation of collective action due to multiple agendas, recent unification efforts</li> </ul>	<ul style="list-style-type: none"> <li>• Top down: no “real” cooperatives have been found preceding the legislation</li> <li>• New cooperatives to be initiated by social rental tenants and (compulsory) supported by housing association</li> </ul>

Linked to the above, policies and tools in each country also pursue different aims. In France there is a drive from the social movement, supported by some politicians, to build a new sector of housing called as “third sector”. This represents a radical critique to the classical housing system, including both to the social and commercial (private) sectors, which are seen as failing to resist to growing housing speculation and to respond to the current housing needs of larger groups of the population. Neither private nor social housing are as accessible for the middle classes as it was in the past - the percentage of social rental housing out of the total

housing stock in France still increases (17% today), but indicates a steady trend towards residualisation. In this context, grassroots movements try to reinvent new ways of developing housing, for instance through “residents’ cooperatives”, besides the ‘historical’ social cooperatives.

In England, as seen earlier, the community-led housing sector is still in the process of taking shape as a ‘movement’ with a coherent and unified voice and identity. However, there have been some joint efforts to lobby government for the establishment of a framework that recognizes different forms of community-led housing as a viable alternative in the housing market and provides the necessary policy and legal tools to enable citizen groups to realize their projects. Like in France, the search for alternative housing solutions besides commercial (private) and social housing is a key driver for many of these initiatives. However, the critique of the housing system is less radical than in the French case.

While in England the new community-led housing tools provide the basis for the potential growth of the sector, in the Netherlands there is a lack of actual rights or duties i.e. a housing association is by no means obliged to hand over management or property rights. Furthermore, in the Netherlands institutional providers (i.e. housing associations) are fully part of the process required to form a cooperative. This responds, to a large extent, to the dominant position that housing associations have in the Dutch housing market, accommodating 32% of the population across a wider variety of income brackets.

A common tension we found in all three countries, albeit in different forms, was the double meaning that is attributed to the policy discourses framing policies that may support the emergence and development of collaborative housing. On the one hand, these discourses are linked to a drive towards co-decision and democratization; on the other hand, they are strongly connected to a neoliberal agenda of State withdrawal from welfare and service provision. In the French case, this second tendency doesn’t exactly concerns “collaborative housing” but rather the management of social housing. Furthermore, the specific meaning that these policies take will depend, to a great extent, on the perspective of each actor.

Lastly, questions emerge regarding the effectiveness of these tools vis-à-vis their respective aims. For example: the difficulty to access land in all three countries, albeit to different extents (e.g. in England and France most collaborative housing initiatives seek for plots of land for new construction, while the cooperatives in the Netherlands are most likely dealing with existing stock owned by housing associations); the lack of engagement from the civil society actors in the Netherlands (both residents and housing associations); the difficulty to access finance in all three cases; the unsuitability of the set of policies and tools in England.

### **3. Conclusions and directions for further research**

In this paper we have tried to shed light on the types of policies that have emerged in recent decades, in parallel and/or as a response to the re-emergence of different forms of collaborative housing in England, France and the Netherlands. We have looked at these three countries as all of them present a combination of three concomitant factors: first, in all of them middle income groups are increasingly struggling to find housing which is affordable and meets their needs; second, in all three countries there is a well-established institutional housing providers, that is facing a process of residualisation and is failing to respond to the needs of the aforementioned households; third, in all three countries there has been a re-emergence of different forms of collaborative housing, which seeks to fulfil the gap left in housing supply for these groups.

Our study has been empirical and exploratory, aimed at scanning the context, policies and key players and interactions between these, which may enable or hinder the successful alignment

of policy and grassroots developments. Our comparative analysis throws some hints; out of our three case-study countries, only in France has there been an explicit debate between the citizen and the political spheres, which has sought to address the demands from the collaborative housing movement in a systematic manner – the (main) outcome so far, being the law ALUR. Although far from resolving all the technical and practical requirements for collaborative housing to flourish, the law is underpinned by a relatively robust social movement and an open dialogue with the public actors, including social housing providers. In England, policies supporting community-led housing have been rife under the banner of the Localist Agenda, but there are doubts as regards the long-term support for this type of housing, should the political priorities change. This is because, unlike in France, these policies and tools have not been the result of a concerted dialogue with the community-led housing actors, but rather the result of a parallel political agenda seeking other aims. Last but not least, in the Netherlands the process has been entirely top-down, and its implementation is struggling to take place. This is clearly the result of a lack of grassroots and stakeholder involvement from the beginning.

On the basis of the above, we can hypothesize that policies that engage grassroots stakeholders from the beginning and throughout the process are more likely to be successful, for at least two reasons: first, they respond to real needs and demands of the citizen groups, and integrate their ideas and solutions as part of the policy design process, thereby ensuring its effectiveness. Second, by involving users from the beginning and throughout the policy design process, these will take ownership of the policy and see it as legitimate. This hypothesis is in line with a large body of literature about the benefits of public participation in policy formulation. However, it is important to consider that the end result of collaborative housing policies is not clear yet; even in France, where the process has been most participative (out of our three countries), the law ALUR still requires the publication of the decrees which will enable grassroots groups to realise their projects. The policy formulation process is still underway and has proven a complex endeavour.

A number of questions for further research arise from the above, such as: How can collaborative housing movements sustain momentum in the face of political discontinuity? (e.g. French case) Are top-down policies to enable participation in housing doomed to failure? (e.g. Dutch case) Is a coalition viable in the longer term when they are motivated by different goals? (e.g. English case).

In order to explore these questions and others, it would be necessary not only to conduct more research (both in-depth and longitudinal), but also to elaborate a theoretical framework that enables a meaningful interpretation and comparison of these developments. Concepts and theories that may be useful include, for example, institutional theory, agency and structuration, civic entrepreneurialism, policy arenas, policy games, policy fit, and resource dependencies, amongst others. We expect to develop such a framework for analysis in a future version of this paper.

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