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**A comparative analysis**

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# HOUSING ORGANISATIONS IN AUSTRALIA AND THE NETHERLANDS: A COMPARATIVE ANALYSIS

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## Abstract

Dutch housing associations are private organisations with a public responsibility which are managed effectively to fulfil the social objectives of providing affordable rental housing. In the Australian system, community housing organisations are categorised as not-for-profit organisations and are mostly characterised by small organisations with very limited resources. This study aims to identify the strengths and weaknesses of the Australian and the Dutch housing association models. A series of interviews with representatives of community housing organisations in Brisbane, Australia, will be compared with the results of similar interviews with representatives of social housing associations in the Netherlands. In addition to differences in management structure, the second principal variation is that of government financial involvement: in the Dutch system, a social housing guarantee is provided by the state government, which reduces the risk of borrowing and, hence, the interest rate accordingly. Furthermore, the encouragement of mixed-housing types in the Netherlands avoids an undesirable concentration of low cost housing in one locality as well as allowing residents to have more housing options and continue to live in the same neighbourhood throughout their life. Adapting the highly subsidised Dutch housing model to fit the Australian context is an opportunity considered in this paper.

**Keywords:** Affordable rental housing, housing association, community housing, Australia, the Netherlands

## 1. Introduction

Australian and Dutch housing policies have contrasting approaches to intervention in housing (Milligan, 2003). The Australian housing system places strong emphasis on home ownership and low density suburbanisation supplemented by public housing. In stark contrast, the Dutch housing system provides for more mass social housing and is public investment focussed and the growth of housing associations in the Netherlands is far greater than in Australia.

A comparative study of housing policies and housing affordability consequences for low income households in Australia and the Netherlands has found some general differences (Milligan, 2003). Given the geographic size and three-tier political system of government

in Australia, the practices and policies of housing associations which have evolved are far more diverse than those of the Netherlands. Moreover, the differences in affordability within the low income segment are more extreme between tenures and age groups in Australia than those in the Netherlands, as are the cost differentials between inter- and intra- urban housing markets.

Interestingly, there are some strong similarities between Australian and Dutch housing outcomes such as the deterioration of housing affordability and the same focus on attracting private funding for supplementing the reduction of government direct funding. Some research and discussion papers have been published on the opportunities for supplying affordable housing in the future (Berry, 2001; Berry, 2003; Seelig, 2004). In the community housing sector, the Australian community housing peak body – the National Community Housing Forum (NCHF) - which has published a discussion paper on some new delivery proposals such as affordable housing initiatives, new joint ventures, social developers and private investments (Brian Elton and Associates and NCHF (A), 1998).

The social housing associations in the Netherlands have long experience of being social developers. Dutch housing associations are categorised as not-for-profit organisations with market orientation and have a public responsibility to provide affordable rental housing (Ouweland and Daalen, 2002). This sector contributed about 35 per cent of all dwellings nationally in 2002 which is the largest social housing sector in Western Europe (Bisset and Milligan, 2004, p.20). In the Australian system, community housing organisations are categorised as not-for-profit organisations and are mostly characterised by small groups with very limited resources.

The study reported in this paper aims to identify the strengths and weaknesses of Australian and Dutch housing association models and to discuss the potential for considering opportunities for adopting Dutch housing association approaches in the Australian context. The following sections compare the Dutch housing associations and the Australian community housing organisations from the literature and from a series of in-depth interviews with representatives of housing organisations in each country. Each section commences with a discussion of Dutch housing associations, followed by the Australian community housing organisation, then concludes with a comparison between the two systems from previous studies.

## 2. Dutch Housing Associations and Australian Community Housing Organisations

Traditionally, social housing has been supplied by government but, progressively over the last twenty years or so and in many countries, direct financial support for social housing from the government has been reduced (Larkin, Lawson and NCHF (A), 1998). For that reason, the social housing sector which has emerged needs to be self-sustainable in its activities or find alternate, private, financial resources. In this study, the social housing system is defined as housing associations which manage social housing stocks from

government funding or public subsidy for housing assistance and are bounded in legislation (Gruis and Nieboer, 2004; Larkin, Lawson and NCHF (A), 1998).

The Dutch social housing sector is organised through a network of large not-for-profit housing associations (Errigo, 2003). The not-for-profit organisations are driven by their mission to meet the affordable housing needs of low income people. In order to achieve the most appropriate housing outcomes a shift in policy approaches was initiated which moved control from a legislative framework to one where the housing organisations are able to make their own strategic decisions to encourage flexible and responsible management. Thus, housing associations in the Netherlands are encouraged to manage the not-for-profit housing associations with a more 'business-like approach' (Gruis and Nieboer, 2004, p.186). This supportive environment has allowed housing associations to have decades of experience to operate independently and obtain private funding for their development (Larkin, Lawson and NCHF (A), 1998, p.8). Moreover, the housing associations initiated mergers which reduced their number by a third from 824 in 1990 to 552 in 2002 to achieve better financial security (Bisset and Milligan, 2004, p.21). As a result, the sector has a favourable financial position with increased solvency ratios, higher liquid reserves and average surpluses per dwelling of Euro240 per annum in 2000 (Priemus, 2003).

The peak body for Dutch social housing associations (Aedes vereniging van woningcorporaties or 'Aedes' as the short form) plays a strong role in the social housing sector. The solidarity and mutuality principles between not-for-profit housing sector associations provide financial support for 'needy' associations (Bisset and Milligan, 2004, p.2). Thus, redistribution of resources between associations ensures viability (Larkin, Lawson and NCHF (A), 1998, p.8).

In the Netherlands, housing associations have a financial guarantee system backed by the central government to minimise the financial risk for private financial institutions (Errigo, 2003; Ouwehand and Daalen, 2002). The financial institutions are willing to discount the interest rate by an average of one per cent below market rates (Bisset and Milligan, 2004). In addition, there is a three-tier model in the Dutch guarantee system for financial social housing. The primary security is the financial position of social housing organisations and the Central Housing Fund (CFV); the housing associations formed a Building Guarantee Fund (WSW) as the secondary security replacing government guarantees; and the state and local government provide ultimate back-up - the so-called 'safetynet' (Aedes, 2003, p.15).

As mentioned above, the Dutch housing associations are granted autonomy to arrange their own business. However, the housing associations have to be accountable through a set of performance criteria which are agreed between municipalities and the housing associations. Wolters (in Bisset and Milligan, 2004, p.23) mentions a 'housing covenant' as a new tool that was introduced to address a set agreement on a range of issues between the municipality and the housing association. Moreover, Clough, et al. (2002) stated the new Housing Act (2002) has introduced a stronger emphasis on accountability requirements and responsibilities.

The BBSH (Besluit Beheer Sociale Huursector) regulates the operations of the social housing sector which include six performance indicators:

- the prioritisation of appropriate accommodation for the target group, so that low-income households receive priority in the allocation of inexpensive dwellings;
- the qualitative upkeep of the housing stock: maintenance, renovation, and new construction of social-rental dwellings;
- the involvement of tenants in the management of their dwellings and the development of new policy;
- the guarantee of the financial continuity of the housing association;
- a contribution to the quality of life in the neighbourhoods where the housing associations' dwellings are situated;
- the combination of housing and care.

(Ouweland and Daalen, 2002, p. 27)

Aedes (2003, p. 11) added a seventh task for social housing associations of promoting home ownership.

The Dutch government regulates the social housing sector by evaluating housing associations regularly. The government's issues of concern include financial and organisational effectiveness as well as the overall housing portfolio and market position (Errigo, 2003). Since 1<sup>st</sup> January (2005) the state government no longer provides subsidies for the operational deficits for building and managing new social rental housing. In the transition periods, government provided 'incentive contributions to build in good and expensive locations' (Aedes, 2003,p.10). This partnership model between government and not-for-profit housing associations provides a better relationship than an 'adversarial relationship or principal and agent relationship' where the government has the power to terminate funding and controls the performance of the not-for-profit organisations.

Dutch housing associations supply a mixed-housing product which provides accommodation for a range of income-group clients. The profit from the higher end product subsidises the low income housing which demonstrate the dual roles of the associations. Moreover, the mixed-housing developments provide wider housing options to clients over their life cycle. People can continue to live in the same neighbourhood throughout their life. In addition, such mixed-income housing avoids low cost housing concentrating in one location.

Rental affordability is a very important aspect of the Dutch social housing system. The regulations cover rent policy (maximum rent fee and rent increases) and rent subsidy to lower-income households. The calculation of the maximum fair rent is based on the house rating system. However, the rating system was reviewed recently (from 1 July 2005) to reflect the location and popularity of the neighbourhood more heavily (Ouweland and Daalen, 2002, p.43-45). In addition, the current rent subsidy policy does not provide incentives with respect to price, because it will also subsidise more expensive rent fees.

A strong relationship between stakeholders has supported social entrepreneurialism and the emergence of hybrid organisations providing a suitably broad housing market for a diverse

range of clients. For the next decade, the Netherlands' government has decided to maintain these current 'hybrid organisations' status which pursue market activities for a social purpose and maintain their status as private organisations but with public accountability (Bisset and Milligan, 2004; Priemus, 2003). This powerful status of Dutch housing associations has resulted from long established experience of working collaboratively with the government as not-for-profit organisations with effective entrepreneurial management practices over the last decade (Bisset and Milligan, 2004).

On the other hand, in Australia, where the system of social housing is less highly evolved from the perspective of public provision, the government has more control over funding and program levels, target groups and the ownership of the housing stock (Larkin, Lawson and NCHF (A), 1998, p.7). A lack of trust regarding the capability of community housing organisations has been the major impediment to reducing the government's control through legislation. Accordingly, community housing organisations have limited experience of working independently and managing their housing stock more efficiently (Susilawati, Armitage and Skitmore, 2005).

Most community housing organisations have a limited technology and human resources capacity. To build the expertise and accountability of not-for-profit housing associations, a series of activities needs to be undertaken by the government and the peak organisation bodies in areas such as training, performance monitoring, sector support, infrastructure and risk management approaches (Larkin, Lawson and NCHF (A), 1998, p.8). Community housing organisations need to build their capacity to manage larger affordable housing stocks (Susilawati, Armitage and Skitmore, 2005).

Whilst not-for-profit housing organisations in Australia are well established to provide for temporary crisis accommodation - with the churches being amongst the leaders of this group - the role of private finance in community housing is less highly evolved. Brian Elton and Associates and NCHF (A) (2000) provides a discussion of a range of recent initiatives across Australia which gives an indication of the diversity of projects in this field, such as joint ventures, debt finance, low cost finance through social/ethical investors and affordable housing initiatives.

The Queensland Department of Housing provides a range of support and funding for community housing organisations including:

- boarding house program, community rent scheme, crisis accommodation program,
- long term community housing, community housing resource worker program,
- home assist secure, home and community care home modification services, same house different landlord, study assistance?

(Queensland Department of Housing, 2005)

Elton categorised private financial options which have been suggested by community housing research papers, into four models: joint venture, debt options, low cost finance through social/ethical investors and affordable housing (Brian Elton and Associates and NCHF (A), 2000). A report on private financing models suggested social developers and social/private landlord model as new delivery model for social and affordable housing

(NCHF (A) and AHURI, 2003). This model has similarities to the Dutch housing association model.

Although such private finance initiatives have been proposed, there is little evidence of the implementation of any of these initiatives. Therefore, many community housing organisations are still highly dependent on government funding and the government retains and exercises power and control in the Australian community housing model.

One major constraint on the development of private investment is the rental structure of social housing. It uses a combination of targeting low-income groups and income-related rent fees which has led to a lack of financial feasibility for most social housing project proposals. Other alternative rent-setting mechanisms that have been used in some community housing organisations include fixed rents based on cost rents or market related rents (NCHF (A), 2002, p.3). Discounted market rents or market rent plus subsidy implemented by some community housing organisations have also been suggested (NCHF (A), 2002, p.4).

Some of the bigger community housing organisations have mixed social housing in their portfolios. However, they only manage not-for-profit generating housing, hence the organisation will not be able to cross-subsidise the income they receive from their portfolio.

In summary, Table 1 compares conditions between the Dutch housing associations and the Australian community housing organisations. The key attributes are classified into four categories: financial resources, organisation, products and regulatory context.

As discussed in Table 1, a key lesson which may be drawn from Dutch housing associations is that of government financial involvement: 'The provision of new and existing social housing is now all privately financed in the Netherlands, supported by a range of direct and indirect subsidy mechanisms' (Kennedy, 2001, p.38). In the Dutch system, a social housing guarantee is provided by the state government which reduces the risk of borrowing and, hence, the interest rate accordingly. Municipalities are responsible for monitoring of housing associations based on annual plans, performance agreements, annual and financial reports. Furthermore, the encouragement of mixed-housing types in the Netherlands avoids an undesirable concentration of low-cost housing in one locality as well as enabling residents to have more housing options and continue to live in the same neighbourhood throughout their life.

Adapting the highly subsidised Dutch housing model to fit the Australian context is an opportunity considered in this paper. A number of researchers have already underlined the key features of financial viability in the social housing systems as broadly relevant in the Australian context.

- Social housing provider has control over the assets, ... hold title to the assets, which are protected against inappropriate disposal through regulatory measures. ... In the Netherlands acquisition and disposal is subject to municipal approval (Clough, et al., 2002 p. 23)

- The government bonds option as (interim) use of government funds to attract and support private investment through a capital injection of funds in new financing structures (NCHF (A) and AHURI, 2003)
- Implementing financial risk management strategies to facilitate private investment (Kennedy, 2001, p.40)

Implementation and further experience-based outcomes from two Dutch housing associations are discussed in the next section.

Table 1. Dutch housing associations and Australian community housing organisations compared

<b>Classification</b>	<b>Dutch housing associations</b>	<b>Australian community housing organisations</b>
<b>Financial resources</b>	<ul style="list-style-type: none"> <li>- Strong asset base as security for borrowing</li> <li>- Government guarantees funds to secure private finance at the least cost</li> </ul>	<ul style="list-style-type: none"> <li>- Government funding as major sources</li> </ul>
<b>Organisation</b>	<ul style="list-style-type: none"> <li>- Capacity building through commercial/ market orientation</li> <li>- Strong role of peak bodies</li> <li>- Redistribution of resources between associations to ensure viability</li> </ul>	<ul style="list-style-type: none"> <li>- Social orientation</li> <li>- Strong role of peak bodies</li> <li>- Sharing information between organisations</li> </ul>
<b>Products</b>	<ul style="list-style-type: none"> <li>- Mixed-housing development to serve different client groups</li> <li>- Cross-subsidise from profit-generating rental and profit-sale projects</li> </ul>	<ul style="list-style-type: none"> <li>- Community housing developments which serve the same client groups</li> <li>- Government subsidy</li> </ul>
<b>Regulatory context</b>	<ul style="list-style-type: none"> <li>- Strongly regulated rent-setting</li> <li>- Land-use regulatory powers to generate opportunities for social housing</li> </ul>	<ul style="list-style-type: none"> <li>- Strong regulated income base rent-setting</li> </ul>

Source: Larkin, Lawson and NCHF (A) (1998, p.10); Susilawati, Armitage and Skitmore (2005)

### 3. Dutch Housing Associations and Australian Community Housing Organisations: case studies

This study discusses two Dutch housing associations based in Leiden and Woorden and two community housing organisations in Brisbane, Queensland. A series of interviews with representatives of community housing organisations in Brisbane, Australia, is compared with the results of similar interviews with representatives of social housing associations in the Netherlands. It is recognised that some of the information will be specific to the local area so may not be the same for the whole of Australia. In order to conform to the preferences of the participants in the Australian case studies their names and affiliations have not been disclosed.



Given the relatively recent emergence and very limited number of community housing projects in Queensland which have a partnership arrangement with the private sector, it is recognised that the sample size is inevitably small. Access to information is also difficult as partnership arrangements are not a characteristic by which such organisations are classified hence their identification and subsequent approaches for inclusion in the sample was achieved by reference to the industry peak body (QCHC) who nominated conforming projects and contacts. Similarly for the Dutch case studies, the peak body (Aedes) was approached to nominate representative organisations from their very much wider pool.

The first case study (A) is a community housing organisation based in Brisbane. Its products, which are mainly boarding houses, are located in the inner-city of Brisbane and are for occupation by people on a low income. Its board of directors is selected by shareholders which comprise representation from two government agencies, ten community-based organisations and five property related professional organisations. The second case study (B) is a community housing organisation based in Brisbane which provides a range of crisis accommodation, transitional and long-term accommodation for low income people. The third case study (C) is a housing association based in Woorden which supplies mixed-housing development. The fourth case study (D) is a housing association based in Leiden. It has a range of housing products including accommodation for singles, families and the aged in a range of different locations.

Government grants to build up inner-city boarding housing stock are the major source of finance for case A. It has implemented a discounted market rent which still falls within the limit for not-for-profit organisations and is still 'affordable' for some groups of people. Unlike Organisation A, Organisation B operates under a different form of government grants and subsidies plus a partnership with the private sector as their financial base for the management of a range of social housing types. The majority of its stock has a combination of income-based rent and government subsidised operational and maintenance cost. The government provides funding to fill the gap between the market rent and the income-based rent when it uses the private stock to accommodate people on low incomes.

Both Dutch housing associations (C and D) discussed in the study have built up their capital progressively over the years as discussed in the previous section. They now have a strong financial and asset base to expand new mixed-housing development.

In Brisbane, the two community housing organisations in this study have a small executive team with different skills. Organisation A believes that recruiting a small team which includes the best professionals and paying them a suitable salary will increase the team's productivity. Organisation B has a small team with limited skills but who are very highly dedicated and very committed to working towards effective outcomes. On the other hand, the two Dutch housing associations have big professional teams which run the associations like business companies. Association D needs a large team to manage a range of products in different towns.

Organisation A develops and manages social housing stock for the medium to low income sector. Although the housing stock is barely affordable for some tenants, they like their

new accommodation due to its better quality. The organisation has the benefit of government grants to develop this new affordable housing supply. The organisation contracts out the management and construction aspects of their supply.

Organisation B has developed different strategies to increase their affordable housing supply. It is difficult to expand their social housing stock from the limited government subsidy they receive for a community housing program. Thus, it seeks and attracts collaboration with other not-for-profit organisations and the private sector for managing new affordable housing stock. Their successful partnership initiatives involve a synergetic effort to bring forth success. Some community service organisations have housing stock but limited housing management skills; therefore, Organisation B offers to manage the housing stock. The similar principle is used to manage low income private rental housing. The cost of management is thus reduced because of the tax benefit facilities of not-for-profit organisations. Meanwhile, the private organisations utilise their financial and human expertise to develop a more efficient housing stock.

As mentioned above, Association C develops mixed-housing projects comprising non-social housing (commercial housing) and social housing in one building. A typical floor plan of its projects has a combination of size and price for commercial housing and social housing as well as owner-occupier and rental accommodation. The feasibility analyses of the overall projects have been undertaken as commercial development exercises which need to satisfy a required rate of financial return. Thus, the income received from the commercial component subsidises the cost of the social housing stock (the rental income from the social housing stock is only 70 per cent of market rent). Another benefit of this arrangement is the social mix of the residents which avoids the development of a ghetto-like conformity.

Association D has implemented mixed-housing but in different buildings in the same neighbourhood. One complex has a mixture of tenure and different family ages and stages in the life cycle. It provides the opportunity for clients to move to different properties based on their family needs in the same neighbourhood, so they are able to maintain their network and social capital. They might need to move to a different house nearby to match their current needs for the number of households, family size, level of income and ages. They can have the choice between renting or buying when they have sufficient income. In addition, Association D has integrated its housing development with other services provided by different organisations such as age care, nursing home and hospital accommodation. Thus, it is not only optimising the use of current services but also increasing the effectiveness and efficiency of their financial and human resources.

#### 4. Comparison of Key Issues

The main differences between the Australian and Dutch case studies are that they have different target groups of clients and provide a varying range of housing stock options. Dutch housing associations have a wider client profile, not just those in the lowest income brackets like the majority of tenants of Australian community housing organisations. In the

Netherlands, they fulfil a broader role of social developer and do not just manage the low rental housing stock, as do their Australian counterparts, but also deal in commercial rental housing and residential property for sale.

Dutch housing associations have to meet their performance agreements with local government as the key government control of the social housing stock. This permits the flexibility to develop a variety of housing types to accommodate a wider range of client need.

Table 2 summarises the key comparative conditions of Australian community housing organisations (A and B) and Dutch housing associations (C and D). Government has a strong role in providing initial financial resources in all organisations. However, the form and size of grants and/ or subsidies varies for different programs.

Moreover, under the same government and regulatory settings, different organisations have different strategies for collaborative arrangements, product differentiation, market segmentation, pricing and cost strategies. From the four case studies, it is evident that commercialisation aspects have some good influences on social housing development. Performance-based control provides room for innovation and improvement to their organisations.

Table 2. Comparative conditions of Australian community housing organisations (A and B) and Dutch housing associations (C and D)

<b>Classification</b>	<b>A</b>	<b>B</b>	<b>C</b>	<b>D</b>
<b>Financial resources</b>	Government grants	Government grants and subsidies for variety of social housing program, plus partnership with private sector	Strong asset base as security for borrowing	Strong asset base as security for borrowing
<b>Organisation</b>	Small professional team	Small dedicated team	Big professional team	Big professional team
<b>Main products</b>	Inner-city boarding houses	Community housing and low private rental housing	Mixed-housing development: commercial and social housing in the same building	Mixed-housing in the same neighbourhood
<b>Rent</b>	Discounted market rent	Income-based rent	Strong regulated rent-setting	Strong regulated rent-setting

Given one of the aims of this paper is to investigate the application of the Dutch model to the Australian situation, this comparison of key issues was identified systems at very different scales of operation but with self-evidently comparable underlying need. In order to advance consideration of the strengths of the highly developed Dutch system it is now considered appropriate to pursue further study of the genesis of the Dutch model as such an historical perspective may provide a greater insight than the very specific illustrations drawn from the current survey of practice and associated perceptions of the respondents

## 5. Conclusion

The Dutch housing experiences provide important hints into 'how to build and maintain a cohesive, more independent social housing sector that achieves financial sustainability, strong social outcomes and a robust division of private responsibility and public accountability' (Bisset and Milligan, 2004, p.24). Their current strong financial position is based on a long history of government financial involvement in the Dutch housing system, whereas, the Australian community housing organisations need to build up a strong asset base as the major financial resource for the expansion of social housing development.

Being a social developer, Dutch housing associations have flexibility to achieve performance-based social housing outcome criteria. For example, mixed-housing projects allow cross-subsidy within the housing stock which improves the viability of social housing projects. Moreover, the clients gain advantages to access a wider range of accommodation to fit their income and family life cycle.

In Australia, private sector funding of social housing offers an opportunity to address the needs of the specific target group of people who are otherwise excluded from the dominant paradigm of housing ownership in Australian society. It continues to offer the potential for extending housing choice for those who cannot access the full range of housing options available to those on higher incomes.

Finally, there is no single solution which could increase the social housing stock within one country. In addition, those solutions are unlikely to be directly applicable across different government and regulatory settings. Just like any other business organisation, a social housing organisation may call upon different strategies to address specific aspects of market segmentation within the low income group by employing techniques from the business world such as product differentiation, tiered pricing and diverse cost strategies.

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