

Contrasting inclusionary housing initiatives in Denmark, Sweden, and Norway: how the past shapes the present

Anna Granath Hansson, Janni Sørensen, Berit Irene Nordahl & Michael Tophøj Sørensen

To cite this article: Anna Granath Hansson, Janni Sørensen, Berit Irene Nordahl & Michael Tophøj Sørensen (12 Mar 2024): Contrasting inclusionary housing initiatives in Denmark, Sweden, and Norway: how the past shapes the present, *Housing Studies*, DOI: [10.1080/02673037.2024.2323607](https://doi.org/10.1080/02673037.2024.2323607)

To link to this article: <https://doi.org/10.1080/02673037.2024.2323607>



© 2024 The Author(s). Published by Informa UK Limited, trading as Taylor & Francis Group



Published online: 12 Mar 2024.



Submit your article to this journal [↗](#)



Article views: 118




View related articles [↗](#)



View Crossmark data [↗](#)

Contrasting inclusionary housing initiatives in Denmark, Sweden, and Norway: how the past shapes the present

Anna Granath Hansson^a , Janni Sørensen^b, Berit Irene Nordahl^c and Michael Tophøj Sørensen^b

^aNordregio and Department of Real Estate and Construction Management, KTH Royal Institute of Technology, Stockholm, Sweden; ^bLand Management & Governance Research Group, Department of Planning, Aalborg University, Aalborg, Denmark; ^cNorwegian Institute for Urban and Regional Research (NIBR), OsloMet, Oslo, Norway

ABSTRACT

Inclusionary housing policies, aiming at creating both affordable housing and mixed neighbourhoods through land use regulation, do not have a long history in Scandinavia. Although Denmark, Norway, and Sweden have traditional welfare state perspectives on equal opportunities and housing, the use of the planning system to implement policy is hesitant. This article outlines the diverse political backgrounds and influences from housing and planning systems that explain this paradox. Further, differences between the housing and planning systems in the three countries are well illustrated by the varying interpretations of inclusionary housing policies. Policy results, in terms of affordability and social mix, play out very differently in the given contexts. The article in this sense adds to the scholarly conversations about barriers and opportunities for IH policy implementation, by contextualizing the conversation with implications from within systems that are relatively homogeneous and aiming for redistribution and equity. This raises questions about when, if, and how IH policy is the appropriate approach.

ARTICLE HISTORY

Received 22 April 2022
Accepted 14 February 2024

KEYWORDS

Inclusionary housing;
affordable housing;
mixed neighbourhoods;
spatial planning;
Scandinavia

Introduction

In many European countries, there has been a general shift away from publicly led housing construction to more market-oriented development and private capital (Marom & Carmon, 2015). Simultaneously, most housing policy is implemented at the local level (Hoekstra, 2020). These policy trends have spurred a search for new tools and researchers have proposed a link between changes in housing and planning systems and the emergence of land models for affordable housing provided by private developers (Calavita & Mallach, 2010; de Kam *et al.*, 2014). In this vein, policies

that can be categorized as inclusionary housing (IH) have been implemented and tested in a variety of countries with different institutional systems. The common denominator of IH policies is that they utilize the land use system to include affordable housing in otherwise market-rate projects, contributing towards socially mixed housing areas (Calavita *et al.*, 1997). Governments have seen IH as an alternative or a supplement to public and social housing (Schuetz *et al.*, 2009).

Despite relatively large construction volumes, the larger Scandinavian cities increasingly struggle with housing affordability, not only for low-income but also moderate- and mid-income households. Commercial property developers and other non-public actors are expected to build the larger share of new housing (Tunström, 2020), while affordable housing vehicles (primarily public housing) are used less towards the overall goals. Although the Scandinavian states and many cities express a wish to promote affordability and social mix, the desire to use instruments that can be associated with what the literature has labelled IH has been hesitant to date. This paper explores attempts in the Scandinavian countries to use policy that could be categorized as IH with the aim to understand this hesitancy and why IH projects are implemented differently in the three countries. The study connects to the international literature on IH offering additional case studies highlighting political goals, legal foundations, organizational and economic prerequisites, and the potential of IH as an affordable housing vehicle, assisting in elucidating the role IH might play (or not) in different types of governance systems. The Scandinavian IH cases are especially interesting as they explore the transition from housing-centred policy to planning policy that ties together affordable housing and social mix. The three cases reveal the struggle to incorporate new fast-moving policy tools into slow-moving institutional settings (Roland, 2004) illustrating the tensions between the housing and land use systems despite the high relevance of IH policy aims in these traditional welfare states. In this context, the paper adds reflections on the intersection of affordability and social mix in planning in the three different institutional settings focusing on tenure mix in Denmark and Sweden and supported home purchase models in Norway. Further, the analysis adds insights on how the level of influence of municipalities and housing associations, respectively impacts response to new housing challenges.

In the following, we present the literature and methods before we turn to analyzing first Denmark, where policies associated with IH are longest standing. We then turn to Sweden where public-private partnerships are driving the models. Finally, we uncover the very different focus in Norway, where expansion of homeownership is the primary approach. The final part of the paper pulls together the collective lessons on the state of IH policy in Scandinavia.

IH in the literature

The main aims of IH policy are to extend affordable housing supply and create socially mixed neighbourhoods (Calavita *et al.*, 1997). Calavita & Mallach (2009, p. 15) defines IH as 'land use regulations that require developers of market-rate residential development to set aside a portion of their units, usually between 10 and 20%, for households unable to afford housing in the open market. Alternatively,

they can choose to pay a fee or donate land in lieu of a providing units. In a European context, de Kam *et al.* (2014) establish that IH policy might also include municipal land provision at below-market price, land situated in locations that create social mix, and the subsidy of projects out of development gains.

IH models have been used in certain states in the US since the 1970s (Calavita & Mallach, 2010), but internationally, most models have been created after the year 2000 (Thaden & Wang, 2017). In most countries, municipal land ownership is limited and IH policy often intends to complement or replace public investment in housing (Schuetz *et al.*, 2009) and is mainly implemented on private land. In countries with larger municipal landbanks, this land is activated for policy implementation. In general, policy demands tend to be larger when public land is involved. Often, IH models extend to a whole city or a share of it. This is usually motivated by competition neutrality between project developers and the intention to spread the resulting housing to different parts of the city (Granath Hansson, 2019).

Inclusionary housing models are implemented directly through enforcement of planning obligations and/or through incentives. When incentives are used, project developers are compensated for increased costs (loss of revenue) through changes to other project parameters, such as allowed project density or priority in the planning process (Schwarz *et al.*, 2012). Direct financial subsidy is also available in certain countries and cities. When the incentive model is used, it is often based on more comprehensive policy documents that are anchored in city politics (Granath Hansson, 2019). The results of negotiations between the municipality and the project developer are then confirmed in one or more of the documents that divide responsibilities for the development: the local plan, the development agreement, potential land sales agreements, etc. (Granath Hansson, 2020). IH models are market driven and dependent on the state of housing markets (Calavita & Mallach, 2010; Schwarz *et al.*, 2012). In general, IH models deliver best in times of good market outlook. At times of negative market developments, IH models are typically more difficult to implement, and the number of dwellings created might decrease (e.g. Mulliner & Maliene, 2013 on Great Britain). Research from the US, Germany, and China points to the importance of policy flexibility, inter alia that there is room for renegotiation in case project conditions change decisively (Drixler *et al.*, 2014; Granath Hansson, 2019; Yan *et al.*, 2021). Flexibility can even be seen as a prerequisite for models to survive over business cycles and political change (Calavita *et al.*, 1997).

IH policy aims to enlarge the supply of affordable housing and create socially mixed neighbourhoods. However, both these claims have been contested. As summarized by Li & Guo (2022), IH has been criticized for producing limited amounts of affordable housing and having a negative impact on housing supply (partly contradicted by Mukhija *et al.*, 2010), and to increase development cost (Kontokosta, 2014), and house prices (partly contradicted by Hughen & Read, 2014). Hughen & Read (2014) suggest that developers are likely to respond to policies by strategically altering decisions on where and how to invest. Li & Guo (2022) also point to developers' avoidance strategies when faced with mandatory IH policy and the need for better evaluation of potential alternatives as well as regional approaches to maximize effectiveness and minimize negative impacts on housing supply. Li and Guo, however, find it unlikely that voluntary, in contrast to mandatory, IH policy would

restrain housing supply. Further, socially mixed neighbourhoods are generally viewed as important in European housing policy (e.g. van Ham *et al.*, 2016) and this goal is especially underlined in the egalitarian Scandinavian policy environment. Musterd & Andersson (2005, p. 762) describe the underlying assumption: ‘the idea is that housing mix (a mix of housing types and tenure types) will create social mix (a mix of households according to their socioeconomic position) and that this will create better social opportunities for individuals’. However, this assumption is not always supported by research results, which might influence IH policy enactment. Some examples with Scandinavian relevance are especially noteworthy: The above-mentioned Musterd & Andersson (2005) find little correlation between the mix of housing type and social mix in a study using Swedish data. Arthurson (2002) questions the correlation between socially mixed neighbourhoods and social cohesion and Galster & Friedrichs (2015) state that it is mainly large concentrations of people with socioeconomic difficulties in the same neighbourhood that is problematic as it has a negative influence on development possibilities of individuals. In the same vein, Hedman *et al.* (2021) state that people’s exposure to various societal groups and different urban textures is mainly explained by mobility patterns, not housing location. Galster (2007, p. 35) claims that ‘the common policy thrust toward neighbourhood social mixing must be seen as based more on faith than fact’.

The choice of whether to implement IH will depend on the attractiveness, efficiency, cost, ease of implementation, and acceptance of alternative policies (de Kam *et al.*, 2014). Schuetz *et al.* (2009) point to the diversity of IH models and advocate that each model should be evaluated on its own merits. Efficiency depends on how the model is designed, the political will to implement the model, the extent of other land instruments that support the model, the attractiveness of the local housing market, and potential local resistance against construction (Kontokosta, 2015). Further, an entity with the capacity and competence to manage the affordable units is required (Nordahl, 2013), which may be a municipality, a not-for-profit organization, or private developers. Depending on the character of the entity, different incentives and restraints come into play. For example, municipalities must ensure legitimacy for their priorities. Kleit & Plage (2015) show how municipalities are split between prioritizing housing for the vulnerable anywhere or promoting affordable housing for a wider group of citizens in all parts of the city. According to de Kam *et al.* (2014, p. 397), IH ‘cannot be introduced without an appropriate definition of the types of housing and households that are eligible to benefit from it’ and an ‘important condition for acceptance and societal support of IH is usually the capacity of the housing system to retain the benefits of IH for eligible households exclusively, for a reasonable number of years’.

Relevance of cases and connecting to the literature

The premise of this paper is that the three countries have significant similarities in government form and welfare state traditions, as well as a historic bond between the nations. This approximation of sameness leads us to seek accumulation of knowledge across countries rather than a comparative analysis. We set out to balance the fine edge of justified expectations that knowledge accumulation is reasonable due to similarities in context, while at the same time, even a cursory review of housing policy

Table 1. Analytical framework.

Core topics to investigate	Connection to existing literature	Types of data used
1. Political focus and goals: How is the problem defined (including affordability for whom and the meaning of social mix)? What actors and policy tools were chosen to solve the problem?	Birk, 2017; Calavita & Mallach, 2010; de Kam <i>et al.</i> , 2014; Galster, 2007; Granath Hansson, 2019, 2020, 2021; Kleit & Plage, 2015; Schuetz <i>et al.</i> , 2009; Seemann, 2021; van Ham <i>et al.</i> , 2016	Governmental publications/plans/ reports at both state and local level found through structured web searches using key words (housing -policy, -cost, -financing, -tenure type, -developer type, -barriers, -mix, -affordability) (in the native language of each country), followed by 'snowballing' for other relevant sources mentioned in the first identified texts.
2. Regulation: How are the governance systems positioned to implement IH?	Calavita & Mallach, 2010; de Kam <i>et al.</i> , 2014; Granath Hansson, 2019, 2020, 2021; Li & Guo, 2022; Marom & Carmon, 2015; Thaden & Wang, 2017; von Fintel, 2021	Legislation (Planning legislation, housing legislation, housing finance rules, social housing support schemes based in law, local legally binding plans, proposals for law amendments in Norway) Other forms of regulation through planning and land allocation practises.
3. Organization and economy: What actors are involved in organization and financing? How is IH implementation financed and managed?	de Kam <i>et al.</i> , 2014; Drixler <i>et al.</i> , 2014; Granath Hansson, 2019, 2020, 2021; Hughen & Read, 2014; Marom & Carmon, 2015; Mukhija <i>et al.</i> , 2010; Schwarz <i>et al.</i> , 2012; Yan <i>et al.</i> , 2021	Local government documents containing demands on and incentives to developers Developer documents (state-, non-profit or private) that outline forms of ownership, housing type, target group. Interview with developers in Norway. Literature on participation of municipalities and developers
4. Outcomes: How is outcome assessed? Are there alternatives to IH?	de Kam <i>et al.</i> , 2014; Granath Hansson, 2020, 2021; Hughen & Read, 2014; Kontokosta, 2015; Mukhija <i>et al.</i> , 2010; Mulliner & Maliene, 2013; Nordahl, 2020; Li & Guo, 2022; Schuetz <i>et al.</i> , 2009; Yan <i>et al.</i> , 2021	Evaluation reports where available, otherwise based on information collected in topic 1–3. Websites and developer's shared account sheets in Norway.

in the Scandinavian countries points to significant differences. It is precisely this element that makes the selected cases interesting as a collective, providing an opportunity to describe the significant differences that exist at both national and local levels in regard to IH, even in contexts where the overarching value system is highly comparable. The intricacies of these differences are thus important to understand to expand knowledge of the different versions of IH. An accumulative case study involves 'studying multiple cases simultaneously or sequentially in an attempt to generate a broader appreciation of a particular issue' (Crowe *et al.*, 2011, p. 2). Parham & Jones (2021) illustrate well the ability of this approach to understand urban policies and practices in two national contexts (Australia and the UK) which were deemed comparable on account of a range of shared research-relevant characteristics, including close cultural ties and similar legal systems, not unlike the ties between our three case countries. In our effort to understand IH in Scandinavia, we wish to uncover critical elements, based on the process outlined in the following framework for analysis (Table 1). The analytical framework applied to each case has been developed in an iterative process

as we reviewed the current state of the art research on IH and began to investigate the topic in Scandinavia. As such the following questions emerged as important to describe to add new layers of knowledge to the IH conversation: political focus and goals, regulation, organization and economy, and outcomes. Each of these themes are used as headlines in the following country sections where the relevant documents and literature in the framework are referenced. Related to this, we would like to emphasize that we do not study social mix policies in detail, but rather how the concept of social mix relates to IH. Based upon this knowledge, we use Bengtsson and Ruonavaara's theoretical ladder of institutionalization (2011) to guide a discussion on the stability of the observed policy changes in the Scandinavian countries.

Denmark: a long path towards IH objectives in planning law

In Denmark, 57% of the population lives in owner occupied units and the other 43% is distributed on private rental, Non-Profit Housing (NPH, Almene Boliger), and cooperative ownership housing. In 2023, there was a total of 567,547 NPH units (Statistics Denmark, 2023) with close to one million residents, which is ~1/6th of the total Danish population (Dansk Almene Boliger, 2023). The work that led up to implementing NPH, dates back to the 1880s when goals that tie together social welfare and affordable rental housing were formulated (Martens Gudmand-Høyer, 2018). Historically, the establishment of NPH did not centre inclusivity but rather focused on affordability for the working class. This has resulted in some NPH areas over time developing a concentration of lower income tenants and people with immigrant background (Birk, 2017). In almost every housing policy till today NPH has been the central tool (Hansen, 2019; Transport-, Bygnings-og Boligministeriet, 2018). To promote NPH in cities, a purpose-provision was added to the Danish Planning Act in 2015 to promote versatility in housing composition through the option of planning for the establishment of NPH in cities. The land on which IH projects are built is mainly owned by NPH associations making them both developers and long-term operators post-completion.

Political focus and goals

Today, policy related to NPH has two main goals, first to promote affordability for low- and mid-income groups who are struggling to find housing in the larger cities in Denmark. Secondly, the law on NPH has been amended to particularly focus on desegregating certain vulnerable NPH areas, mainly by mixing forms of ownership (Seemann, 2021). This second element has been presented as striving towards mixed neighbourhoods which fits the IH narrative but at the same time, the policies reduce the total amount of affordable units in vulnerable areas and therefore work against IH goals. As a result of the law amendment, new NPH is only built outside of vulnerable areas.

Regulation

The legal foundation for NPH is mainly split between the Planning Act and the Law on Non-Profit Housing. Since 2015, the Planning Act includes a provision that

allows municipalities to require, that up to 25% of the housing stock in a new residential area must be NPH. While these units are assigned regardless of income and based on a waiting-list, municipalities have referral rights to typically 25% of the units with the aim of housing vulnerable households (Bolig- og Planstyrelsen, 2021). Additionally, an alternative option for municipalities with high growth in population is to subsidize land purchase expenses (which would otherwise be prohibitive). The first provision is currently proposed raised to 33% and includes a total of 14 strategies to ensure 'room for the schoolteacher, the carpenter and the young academic in Copenhagen' (Lauritzen & Vikkelsø, 2021). The tools are optional for the municipalities to apply as they see fit and if there is political will to do so. The two tools cannot be combined in one setting as to not overburden the municipality. These tools include economic incentives provided by the state and municipalities to make NPH development feasible in collaboration between private and non-profit stakeholders. The actual implementation of the laws at the municipal level is closely tied to local plan approval.

NPH is in general more affordable than private rental but not necessarily affordable for all lower or mid-income households in Copenhagen and a few other large cities. However, there are several housing subsidies that individuals can apply for based on household needs that in some cases make it possible for low-income tenants to live in higher rent units. Therefore, analyses of which households access NPH are complex.

Organization and economy

The NPH sector consists of member-owned housing associations set up for the purpose of constructing and administering affordable housing. Each development is independent both legally and economically. Non-profit housing is tightly regulated through the Law on Non-Profit Housing. Therefore, while not state-owned, the state has great influence and power over this part of the housing sector. The law requires a decent housing standard that centres cost and durability and does not allow for excessively costly extras. It has a maximum total cost set by the Minister of the Interior and Housing. Additionally, municipal interest- and instalment-free loans for 50 years, and government secured mortgage loans, are provided. Two percent of development costs are resident deposits. This package of regulations in terms of cost and subsidies results in stable, predictable, and relatively affordable housing. Despite these incentives, the cost of land makes it prohibitive to stay within regulatory limits for the cost of NPH in some areas of larger cities in particular, and it is here that the option for subsidized land purchase can come into play (Social-, Bolig-og Ældreministeriet, 2021).

The stakeholders involved in developing NPH vary depending on initial land-ownership. When private developers own land, they might be required by the municipality to transfer a part of it to an NPH organization such that NPH can be included in the development area. The Minister of Housing and Planning admits that it can have a negative effect on the incentive to invest in private housing if a local plan requires up to 25% NPH because it de facto implies that private property owners are required by the municipality to forcibly sell a piece of land to a

competing NPH association (Urban & Housing Committee, 2015). However, the rationale behind the entire regulatory setup is that the profit margin in some areas is large enough to motivate private developers to exchange land for an approved local plan. In this way, some of the increase in land value that a new local plan with profitable building opportunities gives rise to is repaid to the municipality.

Outcomes

A recently published evaluation of the 2015 Planning Act provides a summary of the use of the 25% regulation in local plans from 2015 to 2020 and shows that out of ~1700 local plans related to housing development, only 45 included a demand for a percentage of NPH (Ervervstyrelsen, 2021). Early indications point to local differences where the level of housing market heating could be determined. Aarhus municipality appears to get more non-profit housing implemented using the local plan provision than Copenhagen (von Fintel, 2021). A broader evaluation of implementation shows limited success. Within the 45 local plans with non-profit requirements, 10,400 new homes were built as of spring 2021, and of these 635 are non-profit units (6%). Thus, it can be concluded that while Denmark has a system to ensure affordable housing for both mid- and low-income families in the vast majority of cities, the new instrument in the Planning Act that provides the opportunity to force developers to build up to 25% NPH nevertheless has limited effect in the largest cities with heated housing markets.

Sweden: illustrating a focus on public-private partnership

Although the majority of Swedish households own their home, about a third are tenants and about half of rentals are owned by municipal housing companies (Statistics Sweden, 2023). Swedish housing policy from the 1930s onwards focused on public rental housing provision effected through municipal planning monopoly, extensive public land ownership, state financial subsidies, and municipal housing companies (Bengtsson *et al.*, 2013). A gradual change in policy towards market-oriented solutions took place in the aftermath of a financial crisis in the 1990s. For many years now, policy has focused on the construction of large volumes of new housing units by both public and private developers. Only recently, a discussion on what types of households have the economic strength to access this new housing has emerged. To counter critique, a few municipalities have started developing IH models with the aim of creating affordable housing and a greater socioeconomic mix in new housing areas (Granath Hansson, 2021).

Swedish municipal housing companies are expected to act in a business-like manner and do not have any explicit role as providers for low-income groups (Elsinga & Lind, 2013, Grander, 2018). Nonetheless, municipal housing companies have larger proportions of tenants with a less advantageous socioeconomic status compared to other tenures (Borg, 2018). In this context, IH policy provides the municipality with an alternative tool to extend affordable housing supply by inviting private developers to build socially mixed neighbourhoods in areas that are otherwise expected to be accessible mainly to higher income groups (Granath Hansson, 2020).

Political focus and goals

The intent of the Swedish IH approach is to create affordable rental housing targeting low- or mid-income households and thus generating social mix. The share of affordable housing in each project spans between 20 and 100%, with a 15-year time limit for reduced rents. The unitary housing system focuses on 'good housing for all', favours housing queue systems using time as selection criteria, and shuns means-testing. As time-in-queue has proven less efficient at reaching younger and lower income households, various alternative letting strategies are used. In some projects or parts of projects, strict time-in-queue rules do apply, but in others, a first sorting of applicants is made based on other parameters. Often projects target households that the municipality has some responsibility for under the social services act, and thereby work to reduce municipal spending (Granath Hansson, 2021). Explicit targeting of households with lower income from employment, such as key workers, is not on the agenda. However, the emphasis on time-in-queue solutions can be interpreted as a wish to also reach these groups.

Pilot projects are mainly located in cities and towns with a pronounced affordable housing shortage and/or an active housing construction agenda. The policy is restricted to a limited part of a development area or to single projects, which are seen as testbeds. On the local level municipalities adopt different strategies: one project is placed in an exclusive waterfront area, while another is used to link a deprived area to mid-income parts of the city. Effects on social mix will vary accordingly. To date, a handful of projects are under way or have been completed (Granath Hansson, 2020, 2021).

Regulation

IH is realized in a negotiation process between municipalities and developers where developers are invited to propose a project to be built on municipal land. The negotiations result in a development agreement and a land sales or lease agreement. Developers are not officially a party to the local plan, but in reality, it is in many cases developed to fit the negotiated project conditions.

Possibilities to keep rents low for a certain period of time have stirred some discussion. Swedish rental law is based on rents that are collectively negotiated between the Tenants' Union and property owners and does not foresee separately determined rents in single projects. However, in new buildings, rents may be set according to a separate rent system for 15 years which allows for higher rents that better match investment cost. In IH projects, this system is reversed to instead allow rents that are lower than regularly negotiated rents. In other projects, systems for rent reductions have been developed. Municipalities have expressed concern that they are not party to the rent negotiation and therefore do not have insight into negotiations or influence on the outcome. The legal certainty of rent regulation through development and land lease agreements has been questioned. To decrease uncertainty, one municipality has agreed with the developer that large fines apply should the developer raise rents or convert the apartments to ownership (Granath Hansson, 2020).

Organization and economy

Swedish municipalities adjust land prices and leases to the restricted economic potential of affordable housing projects. Compared to the most profitable land use, restrictions demanding affordable rental housing often result in significant losses of municipal income. Granting leaseholds spreads municipal income over a longer period of time and hence also impacts municipal income streams. Further, developers are as a rule expected to pay for technical infrastructure and green spaces related to the project, but since a change of law in 2015, not social infrastructure. Municipalities therefore must balance demands for affordable housing, technical infrastructure, and green space such that developers find the project interesting at the same time as the municipality gets its expenses covered.

To attract developers to participate in IH projects, municipalities offer incentives, such as priority in municipal processes, larger allocations of municipal land, and municipal land to build not only affordable housing but also standard rental housing or tenant-ownership apartments. Some regulatory relief is also granted. Further, the portion of affordable housing in each project is decisive for project calculus and municipalities have been open to suggestions from developers on portions deemed feasible (Granath Hansson, 2020).

Outcome

In Sweden, a limited number of municipalities have implemented IH models in a few testbed projects. Rents applied are considerably below standard rents in new-built rental housing. As follow-up studies of households moving into the created housing have not been made to date, and the question of whether the models reach lower and/or mid-income households cannot be answered, the efficiency of models can currently not be analyzed or verified empirically. As implementing projects has extensive impact on municipal economy, mainly tied to the use of municipal land, and include institutional uncertainties linked to the regulation of rents and allocation of apartments, municipalities might hesitate to scale up models, at least before a solid outcomes analysis can be made.

Should there be a wish to develop models, the most pressing issues are to decide on evaluation tools that can relate municipal outlays to outcomes, as well as to come to conclusions regarding acceptable allocation models and to find robust legal models for the time limited rent regulation of affordable units.

Norway: new affordable purchase models

Norway is a nation of homeowners. The post-WW2 rebuilding scheme activated local and central governments to provide homeownership in modest homes for all kinds of households. Cooperatives, condominiums, and detached houses were built and sold to the general public at prices reduced by state subsidies and price regulation on land acquired by the municipalities. When the housing shortage was overcome and politics became conservative in the 1980s, subsidies and price control were dismantled (Annaniassen, 2006), condominiums and cooperatives became

market housing and private developers took over the task of providing building land. In what Sørvoll (2011) terms the 'social turn', housing policy refocused on how to assist lower income households to purchase a home with the help of means-tested policy instruments, such as housing allowance and adjusted mortgages. The adjusted mortgages are means-tested and counselling is provided to the household before and after purchase (Holm *et al.*, 2020). Lenders' risk is shared between the municipality and the state, and default on payment is rare (Husbanken, 2020). The policy should be understood in the context of a tax system that favours home ownership, a small and expensive private rental market, and very limited council rentals. In this context, assisting lower income households with ownership has proven to decrease the annual cost of living of eligible households compared to renting (Husbanken, 2020).

Political focus and goals

Norway has seen an unprecedented rise in house prices in the last two decades, making centrally located homes unattainable not only for low income but also medium-income households (NHMW, 2020, 2022). When house prices rise, debt rates rise. With the argument of protecting national financial stability, the government instructed private banks to practise loan to income ratios of maximum five times gross annual income, with 15% down payments (Finansdepartementet, 2015). An unintended effect is growing inequality between home seekers with parents who help their offspring with equity and installments and those without (Halvorsen & Lindquist, 2017). Further, eligible households under the assisted purchase schemes have proven to purchase homes in areas where they get the most housing for the funds available (Barlindhaug, 2020). The result is growing spatial segregation. Oslo is now a 'divided city' (Ljunggren, 2017), and division is becoming notable also in smaller cities (Hernæs *et al.*, 2020). To counter the increasing spatial segregation, municipalities seek to accommodate rent-to-buy and shared ownership schemes to increase the housing supply attainable to mid-income households also in more centrally located areas. The state assists the development through initiatives to change the law to facilitate upscaling of these schemes.

Regulation

An underlying, but not so frequently mentioned factor adding to the rising prices is the Norwegian compact city policy (OECD, 2022). Supplying new homes through densification is interwoven with urban renewal and outdoor upgrading. Negotiating developers' contribution to public goods is practised in all growing municipalities. An amendment of the Planning and Building Law in 2006 streamlined the negotiations between developer and municipality and introduced a passage for municipalities to compensate developers at market rate if the municipality wanted to purchase new homes from developers for use in their social housing policy. Thus, the municipalities have the right to require developers' contribution to black, grey, green, and blue infrastructure, but not affordable housing. In 2008, a full revision of the planning and building law strengthened municipal strategic

planning, but never raised the question of whether the act should include measures to ensure social-economic mix in new urban developments. An evaluation of the revision ten years after concluded that the act is poorly adapted to social sustainability (Hofstad, 2018). Municipalities agree and lobby for changes that help them bridge the social housing policy and the general supply policy into a more holistic housing policy (KDD, 2021; KS, 2020). However, no explicit national policy has been implemented to date. Instead, the state and some municipalities back initiatives taken by private developers by amending the housing laws, as will be outlined below.

Organization and economy

To reach larger shares of the population in their marketing and sales processes, developers have introduced rent-to-buy and shared ownership models in new-build projects. Rent-to-buy is a rental agreement where the household signs an option to purchase the unit at a fixed price at a later stage. Shared ownership allows buyers to purchase a 50–90% share of the unit and the right to staircase up within 10 years. Models vary according to price setting, level of rent, and whether additional savings are obligatory (rent-to-buy). These affordable purchase schemes are offered to households who fail to get a mortgage in private banks, because of lack of equity, but have enough income to meet other requirements. Developers pepper sparkle affordable purchase schemes in the new centrally located housing projects. The units hold the same standard as units sold on ordinary terms. As close to all newbuilds in Norwegian cities are located in central areas, the affordable home-purchase schemes offer an opportunity to buy into areas that would otherwise be too expensive for eligible households (Christiansen & Nordahl, 2024).

The affordable purchase schemes are novel in Norway and attempts at upscaling reveal several organizational and institutional obstacles. First, some developers lack the organizational capacity to manage large numbers of units sold through affordable purchase schemes and therefore seek a possibility to transfer the units *en-bloc* to an entity better equipped to manage the units in the time from contract signing to full sale. However, this would require an amendment to housing and tax law. Both the Co-operative Housing Federation of Norway (NBBL, 2021) and the Ministry of Finance (Finansdepartementet, 2021) have proposed changes in these laws, as means to facilitate upscaling (KDD, 2023). Also, the Norwegian house-builders association (Norsk Eiendom) wants to contribute to upscaling by designing standard contracts which aim to balance buyers' and developers' risk.

The Ministry of Local Government and Regional Affairs recently tendered an *ex. ante* study of an eventual change in the planning law that would allow municipalities to require a share of new housing being offered through affordable purchase schemes. The study concluded that this would be fully aligned with the scope of the law but also identified hesitancy among planners to require affordable purchase schemes from developers, despite estimations indicating that affordable purchase is beneficial for medium to low-income households compared to ordinary purchase in the second-hand market or renting (Asphjell *et al.*, 2022).

Outcome

The initiatives that resemble IH in Norway, gained wind from market actors rather than from policy makers. Politics are in the process of catching up and streamlining institutions to facilitate up-scaling. At present, 20–30 developers are delivering affordable purchase schemes.

Some municipalities establish their own rent-to-buy models on municipal land with municipal entities constructing the new housing. Municipalities tend to set lower rents and include savings in the rent. Further, some require more than five years of residence in the municipality for applicants to be eligible (Christiansen & Nordahl, 2024). In 2020, the City of Oslo launched a private-public partnership with two private developers, targeting 1000 new units annually, over a period of 5–7 years.

Cumulative analysis and discussion on the three case analyses

Although Scandinavian countries follow many international trends in planning, IH policies are not widely used. Denmark introduced IH in the Planning Act in 2015, but implementation has been slow. In Sweden, a few pilot projects have been completed or are being planned, but municipalities have been hesitant and have not scaled up models. In Norway, affordable purchase schemes have emerged, and some institutional changes are being initiated. Planning and building laws that support IH are lacking in both Norway and Sweden. Table 2 summarizes the main features of Scandinavian IH. In the following, the drivers of IH policy are analyzed and discussed in relation to the three housing and planning systems with the aim to explain hesitancy as well as differences in policy implementation.

Political goals and the role of target groups

The two goals of IH policy, an increase in affordable housing supply and socially mixed neighbourhoods, play out differently in the three countries. As shown above, all models presented here do create more relatively affordable housing and include elements that point to goals for creating social mix. Scandinavian policy across all

Table 2. Main characteristics of Scandinavian IH models.

	Denmark	Norway	Sweden
Policy start	2014	2013	2011
Formal legal frame in the planning law	YES	NO	NO
Tenure	Rental	Ownership	Rental
Type of developer/provider	Private non-profit	Commercial (municipal)	Commercial (municipal)
Land	Private/municipal	Private	Municipal
Implementing rule	Planning law and municipal land subsidies	Private developers' initiatives, municipal initiatives and PP partnerships	Municipal land sale/lease
Target groups	Households with long time-in-queue, key workers and vulnerable households	Medium income to lower income buyers unable to get a loan in private banks	A mix of the vulnerable and households with long time-in-queue

three countries goes contrary to the statement by de Kam *et al.* (2014) that eligible households must be appropriately defined, and that policy acceptance is linked to the retainment of benefits for eligible households exclusively for a defined period of time. All three countries define the main target households loosely. In Denmark and Sweden, time-in-queue is the main decision criterion, but municipalities also use the IH policy to house vulnerable groups that are partly entitled to housing under social services acts. In the Norwegian case, a combination of low income and lack of required equity to get a mortgage is the main factor in the target group definition.

In Denmark, the political focus on segregation and lack of affordability for key workers seemingly have resulted in a larger willingness to allow state intervention in the market in the form of IH, compared to Norway and Sweden. Outcomes in terms of the numbers of affordable housing units are also the largest in Denmark. The fact that some of the affordable units produced under the new IH policy have lower rent than usual in the Danish NPH may be understood in this context: if the municipality is to make use of IH in market housing, targeting the neediest may legitimize the intervention. Still, the variation in outcome between Copenhagen and Aarhus, also reveals different incentives at the local level that play out in policy implementation reflecting the voluntary nature of the law. Also important is that rent levels in newly produced NPHs are not generally accessible for low-income tenants when built-in central locations in larger cities.

In line with the Swedish unitary housing system and the general reluctance to use income-testing, the main benefit of the IH policy is said to be the creation of housing with lower rents compared to other newly built housing in socially mixed areas. As allocation is mainly based on time-in-queue or made by municipal social services, outcomes in the form of improved housing market access by lower and/or median income households are hard to evaluate, which entails that effects on social mix are unsure. In parallel, the robustness of the rent-setting principles has been questioned. As the model requires reduced municipal land prices or lease payments, it is probable that municipal interest in the model will depend on political standpoints relating outlays to outcomes.

In Norway, developers identify eligible households within the large groups of home seekers that fail to get a mortgage but are able to service a credit. The assisted purchase models widen the customer base such that more households are able to buy new homes in their projects. There are also branding benefits, as providing affordable purchase models is claimed to point to corporate social responsibility. However, developers do not receive public subsidies and they earn slightly less and must postpone the full income on these units.

The limited scale of implementation in all three cases could be linked to loosely defined goals with initial drivers of the policy shift being both undesired spatial segregation and lower income groups being priced out from city centres, with a stronger focus on the former in Sweden and Denmark and a stronger focus on the latter in Norway.

IH in perspective of urban segregation and exclusion

The main motivation for IH initiatives in the Scandinavian countries is to reduce segregation and address the lack of access to some neighbourhoods. Danish and

Swedish cities have worked for lower rents than average but as shown in the previous section, they have not developed a clear picture of IH's ability to aid the diverse needs of people at different levels of income and family composition. If more intentionality was applied towards defining target groups and if there is political will, Danish and Swedish practices may over time and if upscaled, prove constructive to the efforts of reducing segregation. However, there is a certain reluctance against means-testing built into the Danish and Swedish housing systems which is probable to influence the scope and form of IH.

In Norway, developers' affordable purchase models mainly serve low- to mid-income households. The Norwegian commercial models may, if upscaled, aid key workers and other mid-income groups to buy into new housing projects in central and thus the more expensive parts of the city. Although other social housing policy measures include support mechanisms that aid also lower income households to secure home ownership (independently from the new purchase models), policy evaluation shows that eligible households tend to choose more peripheral locations where they can buy larger units within the scope of the support schemes. As such Norwegian policy related to affordable purchase models is limited but clear in its scope.

Scandinavian cities follow the assumption that mixed housing creates social mix. In this paper, this assumption has also been a critical component. Mixed housing can both relate to mixed housing types and mixed housing tenures. In Norway, mixed housing types have been expected to generate socially mixed neighbourhoods. What is new in IH policy is that it tries out a tenure mix in the form of intermediary tenures implemented through assisted purchase models. In Denmark, the tenure mix is already in focus: NPH is being built in areas where this form of housing is not already present in larger numbers, while NPH is not constructed in areas where this tenure dominates the housing supply. In Sweden, both housing type and housing tenure mix are used in policy to create social mix, but IH policy mainly works to introduce affordable rental housing in areas dominated by tenant-ownership thus focusing on tenure mix. Going forward, the effect tenure mix will have on social mix needs to be analyzed in each applied context, preferably in exchange also with the part of the literature that does not support claims of straightforward links between mixed housing and social mix.

Should Scandinavian IH policy be upscaled and easier to evaluate, future research on IH policy should investigate if policy manages to achieve goals connected to social mix both at the completion of construction and over longer periods of time. Such outcome evaluations are probably needed to motivate the institutionalization of models.

Path dependency and institutional change in regulation, organization, and economy

Path dependency (Bengtsson & Ruonavaara, 2010) is evident after uncovering the traits of each country's IH attempts, as these attempts are closely aligned with long-standing institutions in each country. The most pronounced differences between the countries are the choice of tenure and the mode of policy enactment. In Denmark, the long-standing NPH sector has been operationalized and policy enacted through

law. Swedish policy focuses on rental housing and, as there is no national IH initiative, municipalities formulate policy on the local level. In Norway, there are beginning discussions about introducing requirements related to lower-cost ownership schemes in the planning law, and specific suggested changes in the housing laws, which align with Norway's long history of extensive home ownership.

The institutional set-up of IH is clearest in Denmark. There, IH is linked to the long-standing NPH and the Planning Act and although implementation is not obligatory for municipalities, the mode of implementation is straightforward. Various forms of subsidies are also available. As policy has been in place for several years, first experiences can now be evaluated and built upon. Swedish IH has in contrast put the institutional setting to a test as it needs special arrangements related to rent-setting and allocation of apartments that are not standard in Sweden today. Moreover, models are seen as complicated and potentially time-consuming as they build on negotiations between developers and municipalities. The degree of subsidy through municipal land leases or sales is also a point of discussion. The Norwegian case demonstrates that IH is pushing edges in three directions: (i) by constructing entities that deliver market housing with affordable purchase schemes, (ii) by adapting legal frames for effective administration, and (iii) by adding legislative changes to the agenda.

Outcome in relation to institutional change and reproduction

In all three countries, societal challenges and the existing policies' inability to solve these have been identified, leading to an interest in IH policy. To better understand policy solidity Bengtsson & Ruonavaara (2011) theoretical ladder of institutionalization is used. The first of five steps in this ladder refers to whether society recognizes that there are societal challenges that the existing policy and institutions fail to address (step 1), the second step is reached if the discussion is elevated to the policy agenda (step 2). A third step is reached while on the agenda, existing policy makers decide against adopting it (step 3). When policymakers decide in favour of the initiative, policy implementation has reached step 4. Step 5 is evident if the new policy is seen as the only alternative. In a policy change perspective, resistance to change must also be considered. Institutions tend to reproduce themselves, deliberately through cost-benefit analysis or through actors' beliefs and intuitive distrust of the appropriateness of new policy. How the new policy aligns with the overall system of housing policy institutions also plays a role in policy change, as does direct power, especially the power of elite groups. Sweden and Norway are in the process of deciding for or against a policy change, being in between steps three and four on the ladder of institutionalization. Norway is making decisions in favour of law-amendments to facilitate voluntary upscaling. Like Sweden, they are not ready to integrate the required changes in planning and building law. Denmark has decided in favour and has formally implemented IH and thus reached step 4 on the ladder.

Denmark is different from the other two cases in that it has a provider that is capable of delivering affordable homes at a larger scale and could tailor the units to different target groups if desired. However, implementation is still far from being

seen as the only alternative (step 5). Most municipalities are resistant assuming that the municipal tax base could be negatively impacted and concerns that developers will choose to build elsewhere.

In Sweden, existing institutions are reproduced in standard land development processes on municipal land. Changes in sales and lease mandates based on IH policy decrease municipal income and hence are not likely to take place without a deep understanding of the societal benefits of the new policy. In parallel, institutional change relating to rent-setting principles and allocation of housing units is needed to make IH policy effective. Reluctance to deviate from the unitary principles of Swedish housing policy likely hinders IH initiatives. Further, the general focus on housing production volume over affordability might have led Swedish municipalities to avoid more complicated and costly models that could lead to longer processes or less interest from property developers. Should an analysis of housing shortage and market uptake indicate a need for more comprehensive IH schemes, municipalities might need more time to develop robust models.

The dominating dual policy in Norway has strong proponents in society. Macro economists and housing market experts claim that the only option to reduce urban housing unaffordability is to increase the housing supply, ignoring topics related to increased spatial segregation and the growing inequality between home seekers with and without help from their parents. The power of these experts should not be ignored in a 'deciding in favour' discussion (an eventual move from step 4 to step 5 in the ladder discussed above). Market actors, on the other hand, are divided in their view on a shift in the planning and building law (Asphjell *et al.*, 2022). Those who already provide affordable purchase models are in favour, and those who do not are reluctant. The law amendments discussed above might result in up-scaling of affordable purchase models. In addition to commercial developers, some Norwegian municipalities also supply affordable purchase schemes. There are however no thorough comparative calculations of whether assisting the lowest income groups through existing instruments is more effective than combining the existing instruments with the new affordable purchase models. Such calculations are complex but possible and could inform policy on the usefulness of applying IH models also to the lowest income groups.

Market dependency and outcomes going forward

As pointed out in the literature, IH models are dependent on housing market developments. Whereas the market outlook must be positive to implement larger volumes of IH, very positive outlooks might also mean large losses inflicted by IH policy as compared to standard housing alternatives. This might distract policy makers from enforcing policy and instead focus on facilitating large volumes of new housing, especially when municipal land is used.

Currently, housing development in many Scandinavian cities is in a transition phase where high levels of sales have been replaced by low sales levels and cancelled projects. In the years to come, there will probably be less new housing and municipalities might experience increasing difficulties to incentivize developers to take part in IH schemes which could severely hamper policy outcome. Low levels of

construction might also lead to price increases in growing cities. However, new market prerequisites might also lead to innovation driven by a need to act on housing shortage by municipalities and/or a will to stay in the market by developers. Land ownership might also motivate both private and public developers to find new ways to activate their assets. The ways in which these diverse incentives play out will be decisive for the availability of new affordable housing and social mix in new housing areas going forward. Scandinavian cities and towns are probable to continue to weigh costs and benefits of IH against perceived alternatives.

Conclusions

The Scandinavian countries are at an interesting crossroads when it comes to IH policies. All three countries have problems related to affordable housing supply and social mix and have attempted to introduce IH models as one tool to meet policy goals. Although IH policy seems to meet the dual goals of affordable housing and social mix in Scandinavian cities, it is clear that policy outcomes are limited. Hesitancy related to policy effectiveness is centred around efficient targeting, municipal cost, and related political incentives. Considering the complexity of models, both at the policy design and implementation level, more time is needed to develop models that can be implemented on a larger scale. It is deemed probable that policy development will continue in all the three countries and that more refined policy design and implementation strategies will be tested in the years to come. Such development will add new knowledge on weaknesses of the tools and ability to deliver on policy goals. This paper lays the groundwork to follow the implementation of emerging policies. It also adds a layer to the broader international conversation with stories of contexts that with their overarching narrative about equality seem to hesitate to acknowledge that different circumstances require different measures. The strict focus on homeownership in Norway and the Danish and Swedish insistence on primary focus on time in the queue are examples of this.

The study has shown that IH policy fits into housing regimes that are highly different, but rest on a common ground of egalitarianism and belief in social cohesion. Future research could continue to compare policy development and outcome in the three countries, and as policy unfolds, relate it to policy in other countries adding further to the international discussion.

Disclosure statement

No potential conflict of interest was reported by the author(s).

Notes on contributors

Anna Granath Hansson is a Senior Research Fellow at Nordregio and lecturer at KTH Royal Institute of Technology, Sweden. She holds a Ph.D. in real estate science from KTH Royal Institute of Technology. Her main research focus is housing, property development, land use policy and planning and she often takes a comparative perspective between cities and countries in Northern Europe. Before joining academia, Anna pursued a career in the real estate and construction industries.

Janni Sørensen is an associate professor in the Department of Planning and Sustainability at Aalborg University, Denmark. She holds a Ph.D. in Regional Planning from the University of Illinois, Champaign-Urbana, and has for many years worked on participatory neighborhood-scale planning with marginalized communities in Charlotte, North Carolina where she was an associate professor in the Department of Geography and Earth Sciences and the founder and director of the Charlotte Action Research Project. Today her work centers on research and teaching at Aalborg University with a focus on participatory planning processes, the non-profit housing sector and transitions in coastal communities.

Berit Irene Nordahl, is a sociologist and holds a Ph.D. in urban decision-making from NTNU in Trondheim, Norway. Nordahl is head of research at the Institute for Urban and Regional Research, Oslo Metropolitan University, and is an experienced researcher in housing policy and urban planning in Norway and internationally.

Michael Tophøj Sørensen is an associate professor in the Department of Planning and Sustainability at Aalborg University, Denmark. He holds a Ph.D. in planning, regulation and implementation from Aalborg University. His research focuses on sustainable spatial development and in particular legal and other tools to ensure and promote sustainable development in the broadest sense.

Funding

This work was partly funded by the Research Council of Norway.

ORCID

Anna Granath Hansson  <http://orcid.org/0000-0002-8036-2161>

References

- Annaniassen, E. (2006) Norge, det socialdemokratiske ägarlandet, in: B. Bengtson (Ed) *Varför så olika: nordisk bostadspolitik i jämförande historisk ljus* (Malmö: Egalite).
- Arthurson, K. (2002) Creating inclusive communities through balancing social mix: a critical relationship or tenuous link?, *Urban Policy and Research*, 20, pp. 245–261.
- Asphjell, M., Astrup, K., Liane, G. M. & Nordahl, B. I. (2022) *Wieslander, LH Utredning om sosial bærekraft og planbestemmelser om boligsammensetning*. NIBR/OE rapport 2021-74, Oslo: NIBR i sampublikasjon med Oslo Economics.
- Barlindhaug, R. (2020) *Veier inn og ut av dårlige boforhold* (Oslo: OsloMet).
- Bengtsson, B. & Ruonavaara, H. (2010) Introduction to the special issue: Path dependence in housing, *Housing, Theory and Society*, 27, pp. 193–203.
- Bengtsson, B. & Ruonavaara, H. (2011) Comparative process tracing in housing studies, *International Journal of Housing Policy*, 11, pp. 395–414.
- Bengtsson, B., Annaniassen, E., Jensen, L., Ruonavaara, H. & Sveinsson, J. R. (2013) *Varför så olika? Nordisk bostadspolitik i jämförande historiskt ljus* (Malmö: Egalité).
- Birk, R. H. (2017) Infrastructuring the social: Local community work, urban policy and marginalized residential areas in Denmark, *Environment and Planning A: Economy and Space*, 49, pp. 767–783.
- Bolig- og Planstyrelsen (2021) Analyse af almene boliger tilvejebragt ved brug af planloven. Bolig- og Planstyrelsen. Available at www.ft.dk/samling/20201/almudel/BOU/bilag/161/2432599.pdf (accessed 10 January 2024).
- Borg, I. (2018) Universalism lost? The magnitude and spatial pattern of residualisation in the public housing sector in Sweden 1993–2012, *Journal of Housing and the Built Environment*, 34, pp. 405–424.

- Calavita, N. & Mallach, A. (2009) Inclusionary housing, incentives and land value recapture, *Land Lines*, 21, pp. 15–21.
- Calavita, N. & Mallach, A. (2010) *Inclusionary Housing in International Perspective: Affordable Housing, Social Inclusion, and Land Value Recapture* (Cambridge, MA: Lincoln Institute of Land Policy).
- Calavita, N., Grimes, K. & Mallach, A. (1997) Inclusionary housing in California and New Jersey: A comparative analysis, *Housing Policy Debate*, 8, pp. 109–142.
- Christiansen, I. M. & Nordahl, B. I. (2024) Nye boligkjøpsmodeller – med eller mot det etablerte boligregimet? [New home ownership schemes – with or against the established housing regime], *Nordic Journal of Urban Studies*, 4(1).
- Crowe, S., Cresswell, K., Robertson, A., Huby, G., Avery, A. & Sheikh, A. (2011) The case study approach, *BMC Medical Research Methodology*, 11, pp. 100.
- Dansk Almene Boliger (2023) Hvad er en almen bolig? Available at <https://bl.dk/politik-og-analyser/temaer/hvad-er-en-almene-bolig/> (accessed 10 January 2024).
- de Kam, G., Needham, B. & Buitelaar, E. (2014) The embeddedness of inclusionary housing in planning and housing systems: Insights from an international comparison, *Journal of Housing and the Built Environment*, 29, pp. 389–402.
- Drixler, E., Friesecke, F., Kötter, T., Weitkamp, A. & Weiß, D. (2014) *Kommunale Bodenpolitik und Baulandmodelle-Strategien für bezahlbaren Wohnraum? Eine vergleichende Analyse in deutschen Städten*, DVW-Schriftenreihe, Band 76/2014 (Vogtsburg-Oberrotweil: DVW).
- Elsinga, M. & Lind, H. (2013) The effect of EU-Legislation on rental systems in Sweden and The Netherlands, *Housing Studies*, 28, pp. 960–970.
- Ervervstyrelsen (2021). Evaluering af planloven. Available at <https://planinfo.dk/landsplanlaegning/evaluering-af-planloven> (accessed 10 January 2024).
- Finansdepartementet (2015) Utlånsforskriften. Regjeringen.no, 2015. Available at www.regjeringen.no/no/tema/okonomi-og-budsjett/finansmarkedene/utlansforskriften/id2791101/ (accessed 20 November 2023).
- Finansdepartementet (2021) Høringsnotat-ændring i skattereglene for boligselskap – leie til eie, Saksnr 21/2545. 21.05.2021.
- Galster, G. & Friedrichs, J. (2015) The dialectic of neighborhood social mix: Editors' introduction to the special issue, *Housing Studies*, 30, pp. 175–191.
- Galster, G. (2007) Should policy makers strive for neighborhood social mix? An analysis of the Western European evidence base, *Housing Studies*, 22, pp. 523–545.
- Granath Hansson, A. (2019) Inclusionary housing policies in Germany and Sweden: The importance of norms and institutions, *Nordic Journal of Surveying and Real Estate Research*, 14, pp. 7–28.
- Granath Hansson, A. (2020) Land models for affordable housing: Drivers in the housing and planning systems in Sweden, in: E. Hepperle, J. Paulsson, V. Maliene, R. Mansberger, A. Auzins & J. Valciukiene (Eds) *Methods and Concepts of Land Management: Diversity, Changes and New Approaches*, European Academy of Land Use and Development (Zürich: vdf Hochschulverlag).
- Granath Hansson, A. (2021) *Krav på bostäder med lägre hyra och sociala kontrakt i nyproduktionen [Demands for Lower Rents and Social Contracts in Newly Built Housing]*. Report TRITA-ABE-RPT-2135, Stockholm: KTH Royal Institute of Technology.
- Grander, M. (2018) *For the Benefit of Everyone? Explaining the Significance of Swedish Public Housing for Urban Housing Inequality* (Malmö: Malmö University).
- Halvorsen, E. & Lindquist, K. G. (2017) Getting a foot on the housing ladder: The role of parents in giving a Leg-Up, Research Paper 19/2017 Norges Bank.
- Hansen, R. (2019) BL Bygger Videre På En Tradition for Bæredygtighed, Boligen, 2019. Available at <https://fagbladetboligen.dk/alle-nyheder/2019/maj/bl-bygger-videre-pa-en-tradition-n-for-baeredygtighed/> (accessed 10 January 2024).
- Hedman, L., Kadarik, K., Andersson, R. & Östh, J. (2021) Daily mobility patterns: Reducing or reproducing inequalities and segregation? *Social Inclusion*, 9, pp. 208–221.

- Hernæs, Ø., Markussen, S. & Røed, K. (2020) Økende inntektssegregering i norske byregioner, *Tidsskrift for Boligforskning*, 3, pp. 111–129.
- Hoekstra, J. (2020) Comparing local instead of national housing regimes? *Critical Housing Analysis*, 7, pp. 74–85.
- Hofstad, H. (2018) Folkehelse – proaktivt grep pbl i 2008, hva er status ti år etter? in: G. S. Hanssen & N. Aarsæther (Eds) *Plan-og bygningsloven - en lov for vår tid?* (Oslo: Universitetsforlaget).
- Holm, A. M., Owren Nygaard, A., Bråthen, H. I., Løyland, L., Asphaug, & M., Krogstad Asphjel. (2020) *Evaluering av Barna først: Husbankens virkemidler for å få barnefamilier fra leie til eie* (Oslo: Oslo Economics). Oslo Economics rapport 2020-386-1060 (ISBN ISBN 978-82-303-4614-3).
- Hughen, W. K. & Read, D. C. (2014) Inclusionary housing policies, stigma effects and strategic production decisions, *The Journal of Real Estate Finance and Economics*, 48, pp. 589–610.
- Husbanken (2020) Husbankens årsrapport 2020. Available at www.regjeringen.no/contentassets/6ed06d0c878446889f5d59c96feb3fe6/husbankens-arsrapport-2020-final-web.pdf (accessed 20 November 2023).
- KDD (2021) Alminnelig høring av forslag til endringer i plan-og bygningsloven (fortetting, transformasjon, utbyggingsavtaler mv). Available at www.regjeringen.no/no/dokumenter/alminnelig-horing-av-forslag-til-endringer-i-plan-og-bygningsloven-fortetting-transformasjon-utbyggingsavtaler-mv/id2864252/ (accessed 20 November 2023).
- KDD (2023) Forslag till endringer i borettsloven og eierseksjonsloven. Available at www.regjeringen.no/no/dokumenter/horing-forslag-til-endringer-i-borettslagsloven-og-eierseksjonsloven-for-a-legge-bedre-til-rette-for-boligkjopsmodeller/id2986755/ (accessed 1 August 2023).
- Kleit, R. G. & Page, S. B. (2015) The changing role of public housing authorities in the affordable housing delivery system, *Housing Studies*, 30, pp. 621–644.
- Kontokosta, C. E. (2014) Mixed-income housing and neighborhood integration: Evidence from inclusionary zoning programs, *Journal of Urban Affairs*, 36, pp. 716–741.
- Kontokosta, C. E. (2015) Do inclusionary zoning policies equitably disperse affordable housing? A comparative spatial analysis, *Journal of Housing and the Built Environment*, 30, pp. 569–590.
- KS (2020) Styrking av kommunenes rolle som boligpolitisk aktor. Available at www.ks.no/fagomrader/velferd/bolig/styrking-av-kommunenes-rolle-som-boligpolitisk-aktor/ (accessed 20 November 2023).
- Lauritzen & Vikkelsø (2021) Se udspillet: Sadan vil regeringen sikre 22.000 nye almene boliger. *Altinget.dk*. Available at www.altinget.dk/artikel/se-udspillet-sadan-vil-regeringen-sikre-22000-nye-almene-boliger (accessed 31 October 2021).
- Li, F. & Guo, Z. (2022) How does an expansion of mandatory inclusionary housing affect housing supply? *Journal of the American Planning Association*, 88, pp. 83–96.
- Ljunggren J. (Ed) (2017) *Oslo – ulikhetens by* (Oslo: Cappelen Damm Akademiske).
- Marom, N. & Carmon, N. (2015) Affordable housing plans in london and New York: Between marketplace and social mix, *Housing Studies*, 30, pp. 993–1015.
- Martens Gudmand-Høyer, S. (2018) *Værdibaseret udvikling af Danmarks almene boliger* (Aarhus: Arkitektskolen).
- Mukhija, V., Regus, L., Slovin, S. & Das, A. (2010) Can inclusionary zoning be an effective and efficient housing policy? Evidence from los angeles and orange counties, *Journal of Urban Affairs*, 32, pp. 229–252.
- Mulliner, E. & Maliene, V. (2013) Austerity and reform to affordable housing policy, *Journal of Housing and the Built Environment*, 28, pp. 397–407.
- Musterd, S. R. & Andersson, R. (2005) Housing mix, social mix and social opportunities, *Urban Affairs Review*, 40, pp. 761–790.
- NBBL (2021) Høringsuttalelse NBBL - Skatteloven § 7-3. Ref. 9875-14530/LB. Available at www.nbbl.no/media/ij0fd2dl/2021-08-20-skatteloven-7-3-leie-til-eie.pdf (accessed 20 November 2023).
- NHMW (2020) Norwegian Housing Market Watch. Available at housinglab.oslomet.no/wp-content/uploads/2020/03/NorwegianHouseWatch_digital.pdf (accessed 1 June 2020).

- NHMW (2022) Norwegian Housing Market Watch. Available at housinglab.oslomet.no/wp-content/uploads/2022/03/NHMW2022-FINAL.pdf (accessed 20 June 2022).
- Nordahl, B. I. (2013) Convergences and discrepancies between the policy of inclusionary housing and Norway's liberal housing and planning policy. An institutional perspective, *Journal of Housing and Built Environment*, 28, pp. 489–506.
- Nordahl, B. I. (2020) Newbuilds and households in the market periphery – Norwegian housing and planning policy at a glance, in: M. Tunström (Ed) *Building Affordable Homes. Challenges and Solutions in the Nordic Region* (Stockholm: Nordregio). Nordregio report 2020:2.
- OECD (2022) *OECD Environmental Performance Reviews: Norway 2022*. <https://www.oecd.org/environment/country-reviews/> (accessed 20 December 2023).
- Parham, S. & Jones, A. (2021) Exploring sustainable urbanism in masterplanned developments: A collective case study of slippage between principles, policies, and practices, *Journal of Urbanism: International Research on Placemaking and Urban Sustainability*, 14, pp. 97–124.
- Roland, G. (2004) Understanding institutional change: Fast-moving and slow-moving institutions, *Studies in Comparative International Development*, 38, pp. 109–131.
- Schuetz, J., Meltzer, R. & Been, V. (2009) 31 Flavors of inclusionary zoning: Comparing policies from San Francisco, Washington, DC and suburban Boston, *Journal of the American Planning Association*, 75, pp. 441–456.
- Schwarz, H., Ecola, L., Leuschner, K. J. & Kofner, A. (2012) *Is Inclusionary Zoning Inclusionary?* (Santa Monica, CA: RAND Infrastructure).
- Seemann, A. (2021) The Danish 'ghetto initiatives' and the changing nature of social citizenship, 2004–2018, *Critical Social Policy*, 41, pp. 586–605.
- Social-, Bolig- og Ældreministeriet (2021) Bekendtgørelse af lov om almene boliger m.v. (LBK nr 1877 af 27/09/2021). Available at <https://www.retsinformation.dk/eli/ta/2021/1877> (accessed 10 January 2024).
- Statistics Denmark (2023) Statistikbanken. Available at <https://www.statistikbanken.dk/20064> (accessed 10 January 2024).
- Statistics Sweden (2023) Hushållens boende 2022 and Nästan 5,2 miljoner bostäder i landet. Available at <https://www.scb.se/hitta-statistik/statistik-efter-amne/hushallens-ekonomi/inkomster-och-inkomstfordelning/hushallens-boende/pong/statistiknyhet/hushallens-boende-2022/> and <https://www.scb.se/hitta-statistik/statistik-efter-amne/boende-byggande-och-bebyggelse/bostadsbyggande-och-ombyggnad/bostadsbestand/pong/statistiknyhet/bostadsbestandet-31-december-2022/> (accessed 10 January 2024).
- Sørvoll, J. (2011) Den boligsosiale vendingen. Nordisk boligpolitikk fra midten av 1990-tallet i historisk perspektiv, Trykket Vedlegg Til NOU 2011, pp. 15.
- Thaden, E. & Wang, R. (2017) *Inclusionary Housing in the United States: Prevalence, Impact, and Practices* (Cambridge, MA: Lincoln Institute of Land Policy).
- Transport-, Bygnings- og Boligministeriet (2018) *Udbud af byggeprojekter i alment boligbyggeri: Nybyggeri Vejledning til almene boligorganisationer om den gode udbudsproces* (Copenhagen: Transport-, Bygnings- og Boligministeriet).
- Tunström, M. (Ed) (2020) *Building Affordable Homes: Challenges and Solutions in the Nordic Region* (Stockholm: Nordregio).
- Urban and Housing Committee (2015) Betænkning afgivet af By- og Boligudvalget den 17. februar 2015 over Forslag til lov om ændring af lov om planlægning og lov om almene boliger m.v., 2014/1 BTL 89, from <https://www.retsinformation.dk/eli/ft/201414L00557> (accessed 10 January 2024).
- van Ham, M., Tamaru, T., de Vuijust, E. & Zwiers, M. (2016) *Spatial Segregation and Socio-Economic Mobility in European Cities* (Bonn: IZA Institute for the Study of Labor).
- von Fintel, F. (2021) Flere almene boliger i nye og eksisterende lokalplanområder? Available at <https://jurainfo.dk/artikel/flere-almene-boliger-i-nye-og-eksisterende-lokalplanomraader> (accessed 10 January 2024).
- Yan, J., Haffner, M. & Elsinga, M. (2021) Inclusionary housing: an evaluation of a new public rental housing governance instrument in China, *Land*, 10, pp. 305.