

# Convergences and discrepancies between the policy of inclusionary housing and Norway's liberal housing and planning policy: an institutional perspective

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**Abstract** *Inclusionary housing* brings together housing supply policies and social housing policies. This article contrasts this combination of policies to a situation where the two policies *are kept separate*. Drawing on theory of institutional change, the article highlights constitutional, organisational and cultural aspects of inclusionary housing policy and compares this with the features of a policy where inclusionary housing is *not* adopted. The article seeks to assess similarities and discrepancies between the English version of inclusionary housing and Norway's housing and planning policy. The planning law and practices, the policy for housing affordability, financial support systems, actors and organisations are assessed and compared. The article concludes that if Norway wanted to implement ICH, it would be possible to customise the planning practices and finance schemes, but new organisations would have to be established. On top of that, there are also cultural divergences between the policy regimes that would need to be regarded.

**Keywords** Conditioned planning permission · Development control · Housing policy · Institutions · Market housing · Organisations and policy change

## 1 Inclusionary housing: principles and applicability

The idea of *inclusionary housing* (IH) has been around for decades. It is well tested as a means of providing affordable housing in many European countries and in the US,

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Liberalism refers to economic liberalisations, open markets, privatisation, deregulation and the increasing role of the private sector in modern society. In this context, it refers to the division of labour between the market and the state in housing and planning.

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although practices vary from country to country. Inclusionary housing basically links policy on housing affordability to planning permission to ensure that a certain percentage of new housing units are available to low-income households at less than the market price. To this end, a contribution is extracted from private developers in exchange for planning permission (Calavita and Mallach 2010).

This article compares a policy of inclusionary housing with this linkage between planning permission and affordability measures, and a policy without. The purpose is to identify what constitutional and organisational changes are needed for the latter to accommodate inclusionary housing, and to assess cultural and political dimensions of an eventual policy change. This comparison is structured by the help of institutional analysis. It reviews constitutional, organisational and cultural aspects of inclusionary housing policy on which the *English version* of inclusionary housing rests, and compares this to Norway's housing and planning policy. While countries with very different housing policies and different housing histories find a common ground in linking planning, general housing supply and affordable house measures, this linkage appears almost taboo in Norway's official national housing policy. Despite the fact that escalating house prices for many years has been regarded as the most serious housing policy challenge in Norway, no current policy documents discuss instruments aiming at increasing the number of affordable houses. This is striking because local authorities in larger cities urge the state to define a more social-oriented housing supply policy (Nordahl et al. 2007; Haga 2013). It is striking also because Norway has a history where affordability measures used to be linked to planning and supply of new houses. Norway liberalised its housing policy in the late 1980s and has since then practised a market-based housing policy. The question is whether the constitutional and organisational configurations that the last 25 years have been tailored to accommodate a liberal housing policy, incapacitate inclusionary housing policy, and whether there is a cultural and political basis for assessing such IH as future instrument in the Norwegian housing policy.

The article draws on an institutional perspective. It starts with a short presentation of North's discussion of institutional change. The next sections present the planning policy characteristics that enable inclusionary housing in England (1), the funding arrangements (2) and the organisations and actors employed in IH in England (3), and compares this to core features of the Norwegian housing policy field. Part 4 sums up the analysis in the light of institutional change, change drivers and change resistance.

## 2 Institutions and institutional change

The comparison between the English version of inclusionary housing and Norway's planning and housing policy is structured by the framework of institutional analysis. Institutions constitute and regulate collective human actions. Ostrom addresses institutions as products of shared understanding and shared rules that prohibit and permit certain actions under certain conditions (Ostrom 2005). Institutions are necessary to ensure predictability and coordination of social life and create predictability in society. As important as they are for coordination and continuity, they are also pervasive and change resisting. Ostrom underlines that it is the task of an institutional analyst to dig under surface behaviour to obtain a good understanding of what rules participants in a situation are following (Ostrom 2005, p. 19).

The economist Douglass North sees institutions as socially created, and thus amenable to change: 'Institutions are a creation of human beings. They evolve and are altered by

human beings; hence, our theory must begin with the individual. At the same time, the constraints that institutions impose on individual choices are pervasive' (North 1990, p. 5).

North draws a distinction between institutions and organisations. Institutions consist of the formal framework established by society to enable the execution of certain tasks. In addition, institutions embody a wide range of informal assumptions that are difficult to identify in documents or formal regulations. Cultural factors and traditions are examples of such informal constraints. The institutional constraints create predictability and continuity; they are complex and resistant to change. Within these institutional constraints, organisations are created; organisations are designed to exploit whatever opportunities happen to emerge. They come into being and are wound down in quick succession, and when organisations grow, institutions change. Organisations might also grow rich and powerful conditional on an institutional arrangement. If new emerging organisations threaten their existence, they will use that power to prevent that kind of institutional change that will diminish their power. In this sense, then, the way society is organised includes both resistance to change—inertia—and readiness to change. Institutional change, North suggests, tends to occur when the institutional framework is unable to perform important social functions. Institutional change is gradual and comes as a result of changes in people's perception and attitudes. If people come to believe that certain operations can be done better under different institutional conditions, the ground is already laid for organisational and institutional change. The same reasoning applies to organisations that come up against new challenges for which the existing frameworks are not well adapted. In this way, the underlying conditions will allow for an incremental process of change. But institutions also limit the choices people can make. In the context of housing policy, institutions are understood as the legal and organisational premises on which housing developments and social housing policy unfold. Institutional change also takes place in situations where there are multiple ways of solving a problem, and there is no obvious, common and shared understanding of which of them is best. The different approaches to organising housing supply for lower income households are an example. The best policy will, among others, depend on how housing policy interact with other policy fields. It is a case of multiple equilibria where many solutions are possible, but policy makers do not know which of them will actually produce the best result. In these situations, according to North, there will be a *high potential* for change, as the effectiveness and accuracy of the institutional environment might be questioned (North 1990, p. 81). If Norway's housing policy fails to solve problems in ways that are perceived as reasonably satisfactory, that in itself would be a spur to change. At the end of the day, a malfunctioning market is a major cause of institutional change.

What in the opinion of the involved parties constitutes an *optimal approach to affordability problems* is determined by what they know and how they use that knowledge. The way people process information is culturally determined and will eventually narrow the set of options and strengthen tendencies of path dependency. Culture—in the sense of established forms of understanding—tends to sustain patterns of behaviour even where new practices are possible. That same inertia may come from formal rules and constraints. This is why the inherent inertia of society's institutions can slow down or prevent change. In this situation, policy instruments which are consistently better might lose out because organisations and parties fail to make a convincing case for the excellence of the new technologies. North also discusses lock-in situations in which traditional solutions stand in the way of alternative solutions.

The set of opportunities whereby a policy of inclusionary housing can be adopted will be determined by at least three factors: first, there need to be recognition among

policymakers and stakeholders that the current policy is not feasible in tackling affordability problems. Second, there need to be awareness among policymakers and stakeholders about alternative policies and a willingness to assess new instruments. Thirdly, how far current policy incentives and instruments deviate from those of the new policy also play an important role. Policy changes requiring fundamental institutional changes are more unlikely than changes that can be reached through amendment of existing instruments.

The purpose of this article is to compare the core features on which inclusionary housing relies—as exemplified in the case of England—with the design of the same features in the Norwegian housing and planning policy with a view to answering the following questions:

1. What are the differences and similarities between the legal options under the Planning and Building Acts which, respectively, enable and prevent the planning authorities from requiring developers to make a contribution to affordable housing?
2. What are the differences and similarities of stakeholders, organisational configuration, financial instruments and decision-making procedures required to acquire and administer homes procured by means of developer contributions to the organisations and stakeholders in the Norwegian housing system?

As North emphasises, cultural factors should not be ignored in institutional change processes. The article therefore comments on the political discussions that preceded policy changes and reflects on the underlying mindset.

### 2.1 Design and data sources

Inclusionary housing comes in many forms. For the purpose of this article, the *English version* is chosen for comparison. The institutional arrangement of ‘section 106 policy’ in England is compared with the institutional arrangement of the Norwegian planning system and housing policy. Both planning systems and development control polices differ largely between countries (Needham et al. 1999; Booth 2007), the same do housing markets, housing systems and approaches to the affordability problems (Nordvik 2007; Nordahl and Barlindhaug 2010; Barlindhaug and Astrup 2010). The ambition of this article is in no way to give a full comparison of the systems, but to present and analyze the institutional principles on which inclusionary housing rests.

The data for this article were generated by desk-based policy analyses and in-depth studies. A review of the legal, organisational, procedural and economic aspects of inclusionary housing in England was undertaken and compared with practises of the Norwegian local authorities (Barlindhaug et al. 2012). The study builds on two preceding in-depth studies designed to ascertain how the local authorities in Norway practise development control and how their practices relate to the use of *development agreements* (Nordahl et al. 2007, 2011).

## 3 Planning policy and inclusionary housing

In Norway and England, building land is mostly in private hands. In both countries, it is the developer that acquires the land, drafts the zoning plan and submits them to the local authority for approval. Both countries have a ‘bottom up’ planning system, neither have public planning monopoly, both make use of conditioned permission and both systems are

well configured to respond to initiatives from the market<sup>1,2</sup> According to de Kam, Norway's planning system is regulative, the English discretionary (de Kam et al. 2013). In the Norwegian case, however, it is actually difficult to determine exactly whether the system is indeed regulative. Zoning plans authorise the development of land for housing, and the zoning plans must conform to the municipality's general plan, but politicians have considerable discretion in the interpretation of the general plan and in approving or rejecting of submitted zoning proposals.<sup>3</sup> There is a large element of discretion in both the Norwegian system and the English (Nordahl 2006).

### 3.1 Conditioned development permission and inclusionary housing

An inclusionary housing scheme is designed to recover part of the increased value of the property resulting from a zoning decision and put it to use for the good of the public in the form of affordable housing (Calavita and Mallach 2010). The idea is that when the scheme is institutionalised—and recognised by all developers as one of the conditions of planning permission—the developer in consequence will pay less for the land. And since the price of the land is supposed to fall, the imposed conditions will not increase the net building cost. Inclusionary housing (IH) mechanisms have many facets in different countries, but they all share an active use of the planning system. The English version is extensively described and analysed elsewhere; (see for example Monk et al. 2005, 2006, 2010; and Whitehead 2008). It requires a planning system which can issue *conditional planning permission*, and in England, this is enshrined in section 106 of the Town and Country Planning Act. The Home and Community Agency (HCA) has drawn up guidelines explaining how local authorities should implement this provision (Home and Community Agency (HCA) 2011a).<sup>4</sup> Among other things, local authorities need to demonstrate a need for affordable housing in the area where the developer wants to build (Crook et al. 2002).<sup>5</sup> Also the development project must meet some criteria: The projected development must contain a minimum number of units (Monk et al. 2008).<sup>6</sup> The thresholds are defined in the national Planning Policy Statement (PPS), which also includes provisions on the size of the

<sup>1</sup> There is clearly and consistent boundary between systems with and without public planning monopoly. Comparisons of the Swedish system (with planning monopoly) and the Norwegian also show strong similarities at the practical level (Kalbro and Røsnes 2012).

<sup>2</sup> Where the Norwegian and the English systems, diverge is in the legally binding nature of the Norwegian zoning plans. In Norway, the zoning specifications become legally binding once the plan is adapted. The municipality cannot refuse a building application which conforms to the zoning plan unless unforeseen circumstances tell against building permission. (Planjuss nr. 1, 2012 s.13.)The *approved planning permission* in England is not as binding (Nordahl 2006).

<sup>3</sup> If the local municipal or city council wants to approve a planning proposal which is not consistent with the general plan, it can do so and subsequently amend the general plan.

<sup>4</sup> The Homes and Communities Agency (HCA) is the national housing and regeneration agency for England <http://www.homesandcommunities.co.uk/aboutus>.

<sup>5</sup> The Homes and Community Agency (HCA) has constructed a four-component index setting out various ways of identifying needs. The four components are (1) number of temporary housing units (per 1000 households); (2) number of housing benefit recipients (per 1000 households); (3) a deprivation index in which growth in the area is ranked in relation to a 2007 'baseline'; (4) an overview of ratios between income and average house price in the lowest quartile, that is a list showing the number of annual household incomes per average home price for households in the lowest income quartiles, compared with house prices in the lowest price quartile (Homes and Community Agency).

<sup>6</sup> According to the latest available information, the minimum is 15 units. Rural areas are exceptions, where the number can be lower.

community where the housing will be constructed (Crook et al. 2005). The number of affordable housing units as a proportion of the total number of units build will vary from project to project. A study suggests that affordable units usually make up between 10 and 30 % of the units in the development (Crook and Whitehead 2011). In England, the national guidelines emphasise the importance of informing developers whether they will be required to contribute to affordable houses and what form the requirement is likely to take in different areas. Standardisation has not proved useful in practice, and there is no common ‘starting point’ for the negotiations. The local authority appraises the developer’s financial assessments of the housing projects that are to be built, and the assessment forms the basis for the negotiations (Monk et al. 2008). Then, the local authority either

- stipulates the number of residential units it wants for economically deprived households, but leaves it to the developer and the organisation charged with running the negotiated units later on to discuss how much the developer should be paid for each unit;
- or the local authority demands a percentage of the lots or parcels, with necessary infrastructure in place, and leaves it to a local organisation to build the units under discussion.

Either way the purpose is to ensure that an agreed number of the new houses are made available *at below market price* for eligible households. In many cases, the organisation charged with running these units also applies for state social housing grant, in order to further lowering the price for the end user. The processes of deciding developers’ contributions, the application for state grant (if any) and designating the characteristics of eligible households for the particular units in the particular development project are subject to negotiation.

The Norwegian Planning and Building Act defines the type of purpose and specification a local authority may avail itself when conditions for a development are set. A zoning plan consists of specifications such as ‘number of homes in an area’, ‘maximum/minimum floor space’ and ‘building- lines’ (PBA section 12.7 subsection 5). The local authority is not empowered to make specifications that require the developer to sell units to specific groups (senior citizens, young adults, low-income households, etc.). It is at liberty to require parties to *sign a development agreement* that may specify the terms given in the zoning plan in greater detail. The content of the agreements is regulated by the Planning and Building Act, and the law prohibits local authorities to extract development gain. This ban is relatively new.

In Norway, the idea of development gain was on the agenda in the post World War 2 (WW2) rebuilding period (Aase 1967). From 1950s to the 1970s the prevailing housing supply policy in Norway used a model whereby the local authority purchased the land before it was zoned for housing. The local authority zoned, subdivided and provided the land with roads, water, electricity, etc., and sold it to housing associations and commercial developers at cost-cover price (Aase 1967). In that period, the local authorities also provided the end purchasers with subsidised loans. In order to ensure that the subsidies (land at cost price and low interest mortgage) were not cashed in by the first occupier, the policy was accompanied with price clauses on resale. The wording of the clause varied for different tenures. In the 1980s, the price clauses were gradually phased out (see next section). This was followed with a boom in house price—and shortly after: a heavy blast. The downturn in the housing market in the early 1990s in Norway puts many of the land trusts owned by local authorities into bankruptcy and many local authorities faced heavy losses. When house prices started to rise again ten years later, the local authorities had

build down their engagement in land acquisition, especially in urban areas. Then, the private developers took on a more prominent role both in land acquisition and in the detailed planning (Nordahl 2011). Local authorities were reluctant to start up new ‘risky’ land purchases. Many local authorities even found it hard to fund the necessary infrastructure costs needed to facilitate new developments. It was in this situation that *conditioned development permission* control took off.

In 2006, limitations were introduced regarding what local authorities might ask (or require) the developer to contribute. The authorities are not allowed to accept contributions from the developer to the provision of schools and childcare facilities (FOR 2006 KRD). The local authorities are required to announce in the master plan what they expect from the developers (requirement of predictability), and any contribution from developers must be necessary for the proposed development to go ahead (requirement of relevance) and developers’ contribution must be proportionate to the sum investments (requirements of proportionality) (Nordahl 2012). The 2006 revision also regulated local authorities’ right of first refusal to a given number of housing units. If the municipality uses this right, it must compensate the developers at market price (PBL S 17.3 subsection 2). The law opens up for exception of the market price principle only if the acquired land is to be used for public services. Institutions such as nursing homes and caring institutions would qualify for ‘public service’, but *affordable houses* do not. The argument was to avoid that severe development conditions would constrain building of new houses (Ot.prp. no. 32, 2007–2008 p. 233). The amendments must be understood in its context, as briefly explained below: In the years before, more local authorities had required developers to make contributions which the developers saw as unjust. There were stories in the press about ‘greedy’ and ‘erratic’ local authorities, though the empirical evidence of such actions was sparse (Ruud and Nordahl 2005; Nordahl 2006). In fact, a study found that local authorities in general were *not* eager to require developers to enter into development agreements in a ploy to prize contributions (Sunde and Medby 2004). The 2006 restrictions were passed on principal arguing, despite the findings in the Sunde and Melby study. The amendments can be seen in the light of a situation with population growth, rising house prices and low new-build rate. The political wish to reduce planning constraints was based on an assumption that *planning* caused low supply. Obviously, in a situation with growing demand, low supply will increase house prices. It is, however, *not* obvious that increased supply will solve affordability problems. If the complex causality between increased supply and affordability would have been deeper explored, the amendment of the law most likely would have been different. What happened was that an established ‘truth’ was not questioned. Table 1 sums up this section by simplified comparison of similarities and differences in land use planning and development control.

The first row shows the conspicuous difference in the English and Norwegian local authorities’ right to require land from the developer and compensation rules. Row two shows system similarities regarding the role division between the local authority and developers. Row three deepens the material conditions in both countries. The planning systems are built along fairly similar lines in important respects. Apart from the obvious difference, the comparison also displays that in England, the housing situation in the neighbourhood is a part of the evaluation of the project’s contributions. In Norway, this is not the case.

One underlying dimension behind the differences displayed in row one may relate to the fact that the discussions on what local authorities can demand of a developer have been going on for much longer in the UK than in Norway. In the UK, discussions such as ‘wind-fall gain’, ‘planning gain’ and ‘cost recovery’, for instance, date back to before WW2



**Table 1** Similarities and differences in the options available to authorities in England and Norway with respect to the use of planning conditions to require developers to make a contribution

	England	Norway
Row 1: Main differences	Local authority holds permission to require land for affordable houses without compensating developers	Local authorities are obliged to compensate at market price if land is required for any purposes except public services
Row 2: System similarities	Legal basis: Developers propose projects, local authority grants conditioned planning permission Decision process: Negotiated and project specific General condition: Requiring predictability regarding legality of conditions put forward by local authorities	Legal basis: Developers propose projects, local authority grants conditioned planning permission Decision process: Negotiated and project specific General condition: Requiring predictability regarding legality of conditions put forward by local authorities
Row 3: System similarities, material differences	Conditions: Restrictions regarding legality of requirement What kind of housing project (threshold/minimum number of units) Local area characteristics (threshold, minimum community seize) Local area housing needs	Conditions: Restrictions regarding legality of requirement Developers cannot contribute to fund social infrastructure Relative seize of sums transferred from developer to local authority: sum adjusted to total investment Any contribution must be relevant for the development project

The English system also uses cost recovery, but—as a rule—not in section 106 negotiated developments. The contributions are negotiation based where the sum costs are balanced against estimated income

(Healey et al. 1993). A curiosity worth mentioning is that for a short period after WW2, 100 % of development gain was nationalised. This proved to be an efficient stop for any development and was quickly modified (Healey et al. 1993).

Table 1 indicates planning gain versus cost recovery as a dichotomy with England as an example of the former and Norway as one example of the latter. The difference between ‘development gain’ and ‘cost recovery’ is that cost recovery refers to what it costs the local authority to provide roads, water and other utilities to ensure compliance with the zoning specifications and the right of local authorities to recover these outlays. In contrast, planning gain refers to the idea of extracting parts of the land value increase generated by the development permit and using this for the good of society. The ‘cost recovery’ mindset lies at the bottom of Norway’s planning policy today, and the UK practice of section 106 is more analogous to the planning gain approach (Monk et al. 2010).

In practical life, there might be in between solutions that allow for extracting gain for a very narrow set of purposes or practises. The cost recovery approach also may allow for indirect gain extraction: For instance in Norway, there is a registration fee on all sales of housing units, fees for the handling of planning application and building control, etc.

#### 4 Systems of housing subsidies and price control

An important feature of the inclusionary housing scheme is its flexibility regarding choice of tenure; the units can be offered to households as rented units or as home ownership.



In England, three categories of renting/ownership appear to be the most common for section 106 houses: social rented; affordable rented; and variations of shared ownership/shared equity. In *social rented housing*, rent levels are subject to governmental controls (national rent regime), whereas *affordable rented housing* mainly apply a cost-cover principle. Variations of shared ownership/shared equity refer to homes offered for eligible households to purchase at below market price. For example, FirstBuy is now a part of the affordable housing programme (Homes and Community Agency 2011b). FirstBuy is designed to help first-time buyers into affordable home ownership by means of an equity loan scheme which enables the household to purchase the negotiated unit. Housing built in consequence of S106 negotiations is in principle eligible for governmental social housing grant. The grant is allocated according to a national housing investment programme (NAHP 2012a, b). Support is granted on application and on the basis of discretion. What each housing project receives is related to the estimated construction cost (including the cost of the land) and local needs. Subsidies allocated under the this grant are made conditional on the property remaining affordable on resale for households in the future independent of forms of tenure (PP3 2011, p. 9). In brief, the financing of inclusionary housing in the UK is divided among residents, the government via grant from the Homes and Community Agency and the developer. There is a voluminous literature on the schemes' configuration, risk and reward for homeowners which is outside the scope of this article. The essential point here is simply to show that the developers' contribution in most of the cases comes in addition to funding from other sources.

The intertwining of inclusionary housing with other supply-oriented measures corresponds poorly with the demand-oriented measures in the market-based housing policy in Norway. The Norwegian housing policy is highly home-ownership oriented, also for economically deprived households. The affordability policy is to support low-income households to enter into home ownership with instruments such as 'start-up loan' and housing allowance. The start-up loan is a mortgage loan provided by the State Housing Bank with more lenient creditability requirement and (slightly) lower interest rate than market rate (Barlindhaug and Astrup 2010). If the household that have received loans wants to move, they sell their home on the free market, and the remaining loan has to be cashed in. The start-up loan can be combined with housing allowances. In Norway, the housing allowance is indifferent with regard to forms of tenure, but it is means tested and has a 'ceiling' in regard to housing costs. The ceiling varies between regions; however, it is not fine-grained enough to account for price variations within a city region. In addition to these instruments, Norway is now discussing the introduction of new shared equity scheme to further promote the provision of more low-income households with home ownership (NOU 2011:15). The rental market in Norway counts for approximately 20 % of all houses and council renting constitute only 4.5 % (Statistics Norway 2012). In the private rental market, rents are set on market basis, in Norway as in England. In contrast to the English practice, even the rent charged in council houses are encouraged to be 'market rent' (Medby et al. 2012). Housing allowances are (in principle) designed to cover any gap between the 'market rent' and the income. Because of these decisions, it is difficult to imagine a non-profit rental sector for the medium- to lower-income groups, as long as the lowest income groups are supposed to pay market rent (and to receive benefit in order to manage the cost). Table 2 sums up the characteristics of the supply-oriented and demand-oriented policies.

Norway is not without experience in supply-oriented funding schemes—nor in price controls mechanisms related to resale. As briefly described in the previous section, the

**Table 2** Differences between the funding mechanism used in the English version of inclusionary housing and the funding mechanisms used in relation to housing affordability in Norway

Supply-oriented	Demand-oriented
Funding mechanism used in relation to S 106 in England	Prevailing funding schemes in Norway
Free land from developers	
Construction grant	Subsidised mortgages with mild assessment of households creditworthiness ('start-up loans')
Subsidised rents (council rent and cost-cover rent <sup>a</sup> )	Market rent with means-tested housing allowance to bridge the gap between income and living expenses
HomeBuy and similar products where the purchase price is below market price	Some municipalities use shared equity products where the purchase price is market based

<sup>a</sup> Subsidies rent might be combined with housing allowance if necessary

supply of building land and subsidised mortgages was how Norway's housing stock was rebuilt after WW2.<sup>7</sup> There are also examples of contemporary housing programmes based on subsidies and systems of clauses on resale. These programmes are few in number but are nevertheless important in a cultural perspective as by familiarising stakeholders in the housing policy fields with subvention of homes—and, not least, with price clause on resale to upkeep the revolving of the subvention. One example is the State Housing Bank programme from 1987 designed to speed up the supply of rental housing for young adults. Norway's second largest city, Bergen, used the scheme in collaboration with the local housing association. The association used the grant to construct new, affordable rented housing for young adults. The municipality of Bergen retained a right to allocate 30 per cent of the units to households on their social housing waiting list. The housing association allocated the rest to their members. Over a ten-year period, the scheme at national level resulted in 12,000 new units (St. Meld. Nr 49 (1997–1998)). Another example is the low-deposit housing programme in which the housing associations tried to design a product where a subsidised loan (like start-up loans) and housing grants were combined in order to facilitate the building of affordable homes. Setting resale terms and controlling the resale price was an essential element of the package (St. meld. Nr 49 (1997–1998)). A pilot scheme got under way, but the funding was limited. There was also confusion as to how the rules on length of residence and price control should be interpreted and practised. In fact, the scheme only resulted in a few hundred units. Low-deposit condominiums have been built in recent years, but they are not subsidised and therefore not subject to government price control (Arntsen et al. 2006; Barlindhaug et al. 2009). Barlindhaug points out that the resale price regulation appears to have been the most significant factor behind the short life of these programmes (Barlindhaug et al. 2012).

Price control on resale has a particular history in Norway, which might be of importance for understanding the preference for market price principles. During the period of reconstruction following WW2, subsidising housing for ordinary people was common policy in Norway as there were price controls on resale, calculated on basis of the size of the subsidies. During the 1960s and 1970s, the price control had evolved differently for

<sup>7</sup> See, for example, Ananniassen 1999 for an in-depth study of the history of the housing cooperation, Kjøsterød 2009 for the history of the State Housing Bank, Nordahl 2011 for a summary of the use of subsidised land in the post-WW2 rebuilding phase.

different kinds of ownership. Individual home owners enjoyed as good as no price control. Condominiums, where a part of the equity was shared between owners, faced a stricter price control. Condominiums that were *not* member of Housing Associations could circumvent this by organising sales directly between seller and buyer: frequently, the official regulated price was ‘topped’ with a considerable amount paid ‘under the table’. Housing condominiums which were members of Housing Associations had to comply with a rule of first refusal for members—which broke this direct relation and made ‘black money’ less of an option (NOU 1972:4). In the 1980s, there were heavy political debates between those in favour of abandoning price control and those in favour of keeping it but breaking direct seller–purchaser relationship in all housing transactions involving price control (Sørvold 2011). The abolition of price control on condominiums in 1988 was de facto the abolition of a *duty* to control resale prices, not the right to. There are contemporary examples of local authorities and private companies imposing resale conditions on condominiums—if the units have had some subsidises. Nowadays, the public know little about resale conditions and reasons behind it. An example that can illustrate the misunderstandings and disputes is the Norwegian Supreme Court judged of a case in which the heirs to a price-controlled condominium flat attempted to void the housing association’s right to put conditions on the resale. The association believed it was justified in doing so because the municipality of Oslo had leased the land to the housing association at an extremely reasonable price when the houses were built. The heirs claimed that the housing association no longer had the right to invoke the price control mechanism, and argued in favour of selling at the market price, or (at least) of a more moderate interpretation of the price control principles. The Supreme Court found that the housing association’s principles of price setting were valid. The judgment is fundamentally important in that it establishes a right to invoke principles of price formation in cases where a percentage of the total construction cost is subsidised. The judgment is interesting in a cultural perspective. If price control had been considered a legitimate mechanism, the case would not have been taken to the court in the first place.

To sum up, the financing and administration of subsidies invested in the units are important features of the institutional premises of inclusionary housing. Norway is experienced with resale clauses on subsidised houses, but this experience is highly ambivalent. The ambivalence might very well contribute to ‘sustain the pattern of behaviour’ and work against change and against willingness to any careful assessing of IH. Also, the current practice of state-led means-testing the housing allowances and the clearly defining target groups for particular state financed housing programmes, empowers the state to control access to the limited good of house subsidies. Inclusionary housing practised in England seems to give the local level more influence in access control than the Norwegian system does. It is an open question whether the Norwegian state would front policy changes that empower the local level on the cost of the state.

## **5 Stakeholders and organisations in inclusionary housing and in the Norwegian social housing policy field**

The third element of inclusionary housing regards the entity that manages the affordable houses. These entities work on behalf of or in close cooperation with the local authority. They manage developers’ contributions, link the contribution with other funding sources and they manage the subsidised units. In England, the local authority can play this role, or it can be given to an entity which has specialised in this type of support scheme and this

type of housing. Local authorities manage around 25 % of all properties negotiated under section 106. Private developers, housing associations and other NGOs manage the remaining 75 %. In England, the *registered provider scheme* is used to standardise the characteristics of the organisations entitled to manage the affordable units. Registered Providers (RPs) are independent housing organisations registered with the Homes and Communities Agency under the Housing Act of 1996. Most are housing associations, but there are also independent trusts. Some commercial house builders have formed their own trusts in order to manage the subsidised units (registered as ‘for-profit’ providers (HCA 2012)). Whatever the model, the body assigning and supervising affordable houses has to be *certified* to do so. Only certified RPs can apply for grants from the national fund (social housing grant). In 2011, the list of accredited providers counted 146 developers and housing companies (Housing and Community Agency (HCA) and NAHP, 2011b), representing a wide variety of stakeholders. The variety of RPs gives local authorities a great deal of latitude. In reality, the local authority can put affordable housing out to tender, inviting different registered providers to compete for the assignment and tailor the solution to the local needs<sup>8</sup> (Monk et al. 2006, 2008).

Norway has a much smaller stakeholder pool compared to England. As shown, local authorities are particularly prominent in the supervising of the (few) subsidised housing schemes that do exist. Housing associations, which in Norway are run on commercial basis, are also involved, if only to a limited extent. Were Norway to adopt a system of inclusionary housing, developer contributions would be managed either by the local authorities or by a new type of entity would have to be created. Judging by the interest of private developers and housing associations in the affordable housing schemes discussed earlier (low deposit and subsidised rental housing), a role such as this might well appeal to them.

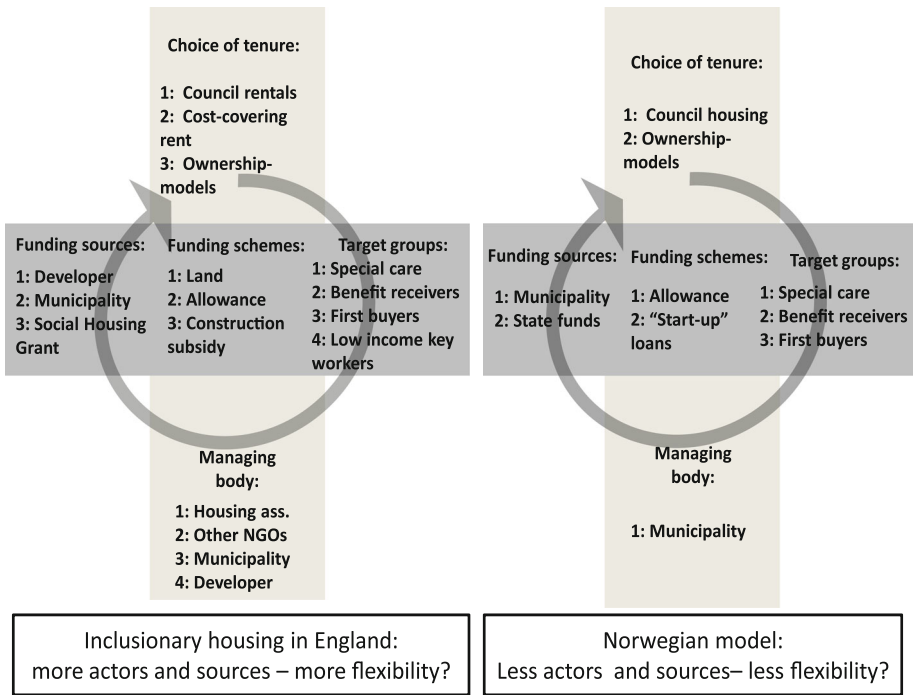
In general, inclusionary housing seems to be a flexible housing policy instrument and has so far survived major criticism (see, i.a. Audit commission 2006, Report GOT 3362). Its strength lies partly in its adaptability within the system’s parameters. The system allows for funding from different sources and different tenures, and so, the negotiated houses can be tailored to local conditions and prioritised groups. The developers also enjoy wider options because their contribution can be adapted to skills, corporate identity and project-specific factors. Figure 1 sums up the differences in actors and schemes and displays the richness that Inclusionary Housing brings to the bouquet of social housing policy instruments:

Norway has fewer stakeholders, fewer funding sources and less subsidising schemes. Grant schemes are essentially managed by local authorities, including subsidies for rental housing or shared equity schemes. The Norwegian approach appears less flexible than the English, with fewer schemes aimed at helping individuals and families into home ownership or rented accommodation, consequently also with less target groups.

## 6 Summing up system adaptability and change promoting challenges

This article has compared the English version of inclusionary housing with a linkage between affordable housing and the planning system and the Norwegian system without

<sup>8</sup> Documents presenting the government’s ideas on reforming and improving practices relating to Section 106 negotiations were issued by the Office of Deputy Prime Minister (ODPM). In May 2006, the office became the Department of Community and Local Government.



**Fig. 1** Differences in the choice of options to tailor housing support to low-income households in a system which include ICH and the Norwegian system

this link. I have assessed the compatibility of the Norwegian planning system to include arrangements similar to the English section 106, and the Norwegian social housing funding schemes capability to support an eventual Norwegian version of inclusionary housing.

With regard to the differences in the legal framework, there are fundamental similarities in the development control policies in England and Norway. In both systems, the land for development is (mainly) in private hands. In both systems, commercial developers produce most of the homes and sell them on the market at running prices. Both systems make use of conditioned development control, and development decisions are made project wise, on basis of negotiation and political discretion. If Norway would want to add inclusionary housing to its policy instruments, the wording in the planning and building act would have to be changed. In Norway, local authorities have to operate on the basis of *market price* when right of first refusal is used to acquire building land (or houses) from the developers. The requirement of market price compensation was introduced by central government in 2006 in a bid to provide a more predictable environment for developers by tightening the reins of local authorities' use of the development agreement, but strikingly little research has been done on the effect of the 2006 amendments. The one study that is conducted clearly shows that the policy has failed *in creating predictability* for the developers (Plathe and Jørgensen 2009). A 'fixed fee' appears to be more welcomed among developers that the requirements of predictability, relevance and proportionality. This is at least a *latent thrive* for change in the legal arrangement and a change in the direction required for IH.

The idea behind the amendment of this provision is that rising prices is driven by scarcity where demand exceeds supply and that constraints that lower rate of new houses

will fuel this development. Obviously, lowering the build-out rate in a growing market might increase prices. It is far less obvious that, in a growing market, affordability problems will be solved through increasing the number of new market houses. However, if the authorities should change the wording in the law towards fixed fees, it skews the principles from 'cost recovery' into the direction of a 'development fee'. This would be a move with cultural dimensions. In Norway, a property right normally includes full development rights, and it is more than 25 years since local authorities' 'creamed off' land value increase created by urbanisation and planning permission and used it for housing purposes. It is hard to predict what impact such a change will actually have on landowners and developers. It *might* increase predictability for developers and subsequently shift the burden over to the landowners.

North (1990) argues that how far current policy incentives and instruments deviate from those of the new policy play an important role in institutional change. The analysis has shown that the policy changes towards IH does not require fundamental changes in the planning policy as both systems are well familiar with the use of conditioned development. The fact that the 2006 amendment of the Norwegian Planning Act imposed a principle of compensation to market price does not change this. Wording of paragraphs can easily be changed if it is a shared understanding among policy makers that this will improve policy performance. The organisational configuration in the policy field and the prevailing funding schemes appears more difficult to compare and adjust to the ICH policy. Inclusionary housing as practised in England gives the local authority a prominent role versus the national state in defining and ranging eligible beneficiaries. As explained, in the prevailing Norwegian system, the state has a prominent position in defining housing allowances thresholds and housing programmes target groups (like programme for constructing houses for elderly). Housing subsidies is what Ostrom term 'a subtractable good' (Ostrom 2005) as the consumption of the one beneficiary in principle reduces the available subsidies for another. It is also difficult to delineate this good against potential beneficiaries. Changes that alter the established order of beneficiaries are likely to evoke resistance. A step away from the existing (strong) means-tested housing allowance scheme towards an in-kind subsidy might be too big for Norway, especially if the policymakers have not familiarised themselves with alternative systems. If they also have the collapse of the post WW2 in-kind subsidy schemes in their minds, the cultural dimension might counter change.

North identifies another main engine of institutional change, namely *market inefficiency*. A crucial question is therefore if the housing market problems in Norwegian cities are perceived by policymakers and stakeholders to be *severe enough* to animate policy makers to look for new instruments. According to North, this will depend on how well the contemporary policy functions, and the character and scale of housing market problems in Norway. A short dive into this might fill in the picture.

Although Norway's economic situation is extremely favourable, the housing market remains a source of concern to the individual and to the national authorities. Summarised, the problems are rapid price growth coupled with segregation and exclusion mechanisms, especially in the major cities. In 2010, Oslo was the fastest growing capital city in the Western world (UN 2011), the five largest cities in Norway saw their population grow by 15 % between 2002 and 2011. Population growth has run parallel with sharp rise in house prices (Astrup 2012). Affordability calculated as the number of average yearly salaries needed to purchase an average house has risen from 4 in 1993 to 10 for Oslo in the year 2009. Despite low interest rate, the average cost of an average mortgage has risen significantly (Barlindhaug and Astrup 2012, p. 32). It is a major concern that young adults and low-income households are facing severe difficulties in purchasing a home. As Norway is a

country of home owners and the rental market so small, renting is no sustainable option for households without means to purchase a home. As the rent is deregulated,<sup>9</sup> rent levels in the cities reach new heights every year. Consequences of rising house prices are alarming also for the labour market. Norway's main cities face high immigration rates. In 2009, as many as 7 out of 10 immigrants settled in Oslo. The large majority of future population growth will be caused by labour immigrants. Many of them have low income and no accumulated capital and many have low paid jobs (Søholt 2012). The situation challenges the country's financial stability as it stimulates low-income household lending. Almost every fourth mortgage has a loan-to-value ratio of 90 or more (St. melding 24 2011–2012 chap. 2). In short, rising prices and housing affordability problems are at the political agenda. Also the other driver behind inclusionary housing policies, the segregation, is now rising and higher on the agenda in the capital area and other large cities. In a deregulated housing market where new and used homes are sold on market terms, the price differences will be maintained and segregation tendencies will increase over time, unless local government interferes (Kvinge et al. 2012; Barlindhaug et al. 2011).

It appears that the housing policy in Norway has pursued over the past 25 years has reached a crossroads. Both national and local authorities are trying to diagnose the problems. This is reflected in the two recent white papers which the Ministry of Local Government and Regional Development (KRD) has compiled. (St. melding 28 (2011–2012) and St. meld 17 (2012–2013).<sup>10</sup>).

In his analysis of institutional change, North refers to Ronald Heiner and his analysis of obstacles to institutional change. Heiner points out that a systems' likeliness to change rests heavily on competence of the agents, to identify problems and to analyse complex causalities. The gap between the agent's competence to decipher the problem and the difficulties in selecting the preferred alternatives is described as a competence—difficulty gap. The greater the gap the likelier the result will be continuation of the status quo: '(...)the greater the gap the more likely the agent will impose regularised and very limited pattern of response, to be able to deal with the complexity and uncertainties associated with the gap' (North 1990, p. 23). Research and information with a broader perspective than the mere evaluation of instrument performances could be a valuable contribution to building competence on the complex causality of housing affordability and planning practises. Over time, a great deal of energy has been spent on fine tuning and streamlining the existing systems. Considerable less energy has been spent in addressing alternative policies and in particular in critical reviews of the appropriateness of the current policy in dealing with new problems: For instance, proper addressing of the housing challenges that arise from centralisation and immigration or the *long-term effect of market housing on segregation*. If politicians, policy makers and citizens come to believe that affordability problems could be solved better under different institutional conditions, for instance under a policy that also facilitates inclusionary housing, the ground would have been laid for organisational and

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<sup>9</sup> Statistics Norway conducts annual surveys to oversee the price development of rents. The results are supposed to be guiding principles when rents are set. (Statistics Norway 2008: <http://www.ssb.no/boligstat/>). This is also the case for council housing: the Municipalities are setting the rent based on market price and households which cannot afford to pay market rents are eligible to apply for allowances.

<sup>10</sup> The final report of the Housing Inquiry (NOU 2011:15) was not overly concerned with general housing supply, affordability also for low income households or segregation in the housing market. This was a matter several local authorities were indeed quick to point out in their comments to the report. Some local authorities urged the government to devise '*incentives which linked measures available under the Planning and Building Act much more closely with social housing policy*' (Sandnes municipality, a response to NOU 2011:14).



institutional change. The obstacles to policy change in Norway that lie in the formal regulatory, organisational and financial arrangements are in a form that could easily be amended. The major obstacle appears rather to lie just as much in the competence to review the complexity of the field and the cultural mindset in a frank and rational assessing of alternative approaches to affordable housing.

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