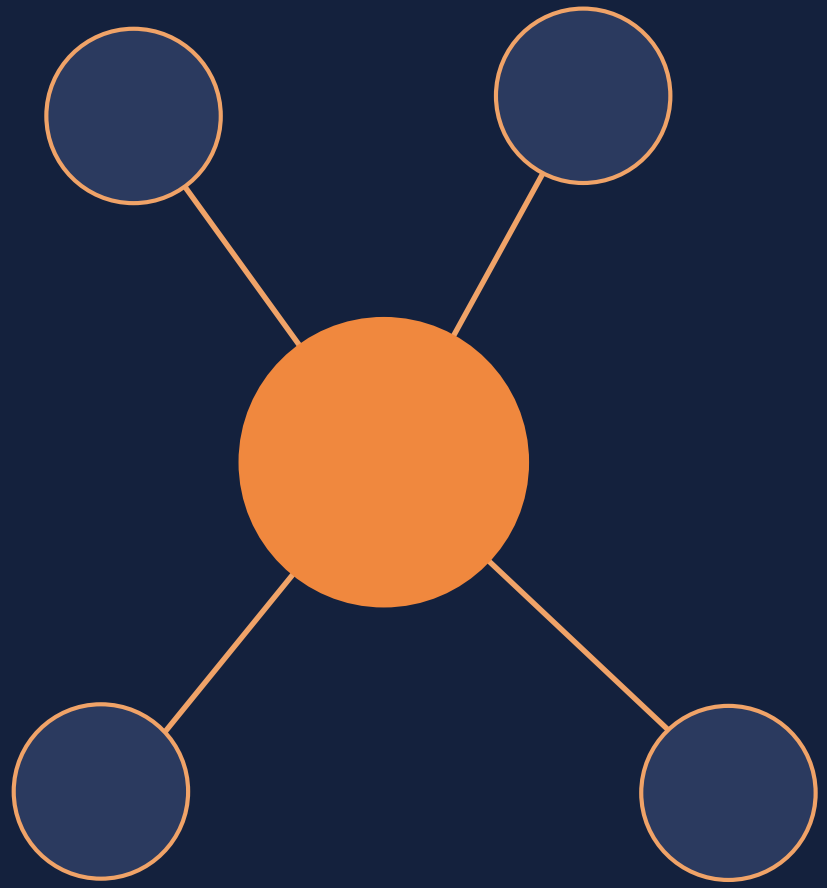
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Rethinking Housing Policies Through Policy Transfer



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Housing policy in a global context

Shared challenges

Challenges are prominent on policy agendas worldwide.

- Tenure,
- Finance,
- Land,
- Social cohesion,
- Building materials, quality….

Distinct frameworks

- Country specific / unique financial and legal frameworks,
- Various definitions of social / affordable / low-income / public housing, terminology.

Learning across borders

- One nation’s experience can serve as an example for other countries and cities.
- Experiences within the country from it’s past.

Aim and method

Aim

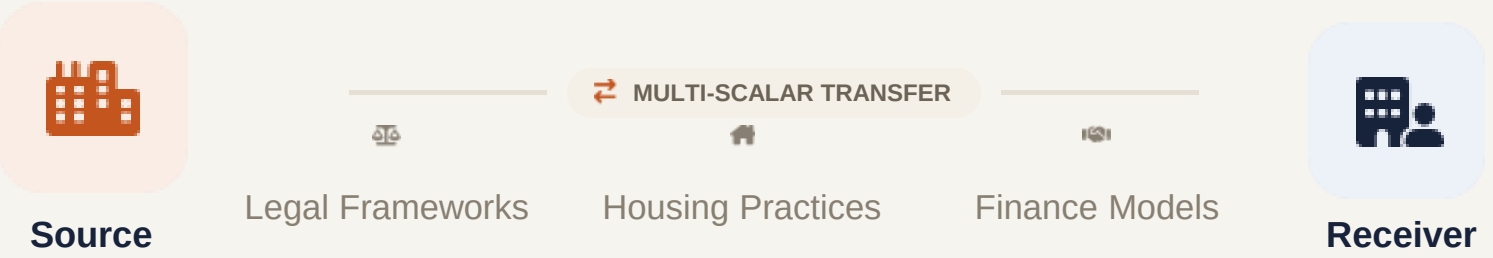
- Examine the role and significance of policy transfer in the housing sector
- Assess the scope of its implementation
- Explore evidence-based policymaking from diverse perspectives
- Preparing a framework / guideline / model for Turkish housing policy / social housing provision.

Method

- Reviewing comparative housing studies
- Evaluation by **theoretical context, policy adaptability, and roles of stakeholders and institutions**

Policy transfer?

A mechanism for transferring practices, legal frameworks and approaches across multiple scales.



Voluntary Transfer Adaptation

Policymakers proactively draw on international benchmark practices, learning and tailoring them to local housing dynamics.

Imposed Transfer Conditionality

External institutions mandate policy adoption through conditionality, international lending requirements, or institutional pressure.

What is being transferred?

What is moving?

- Policy goals, structure
- Policy instruments,
- Institutions
- Ideology, ideas, attitudes

How far does it go? *(Dolowitz & Marsh, 2000)*

1 Copying

Adopting a policy directly and completely, as it is

2 Emulating

Taking the idea behind a policy, adapting the details

3 Hybridising / Synthesising

Blending elements of policies from several places into a new policy

4 Inspiring

An example elsewhere sparks a new, locally designed policy

Transfer routes and conceptual frameworks

Minkman et al. (2018) built an evidence-based model from 180 empirical studies to explain how policy transfer works and why it succeeds or fails.

Four building blocks:

- **Environment (External):** Political climate, socio-economic setting and timing can constrain or enable policy actors (Evans, 2009).

Internal

- **Transferability:** decisive when exploring options
- **Process design:** how actors exchange knowledge and set up adoption.
- **Adoptability:** fit with the receiving context, plus capacity, resources and flexibility; matters in later stages.

Policy transfer routes: an evidence-based conceptual model to explain policy adoption

E. (Ellen) Minkman, M. W. (Arwin) van Buuren & V. J. J. M. (Victor) Bekkers

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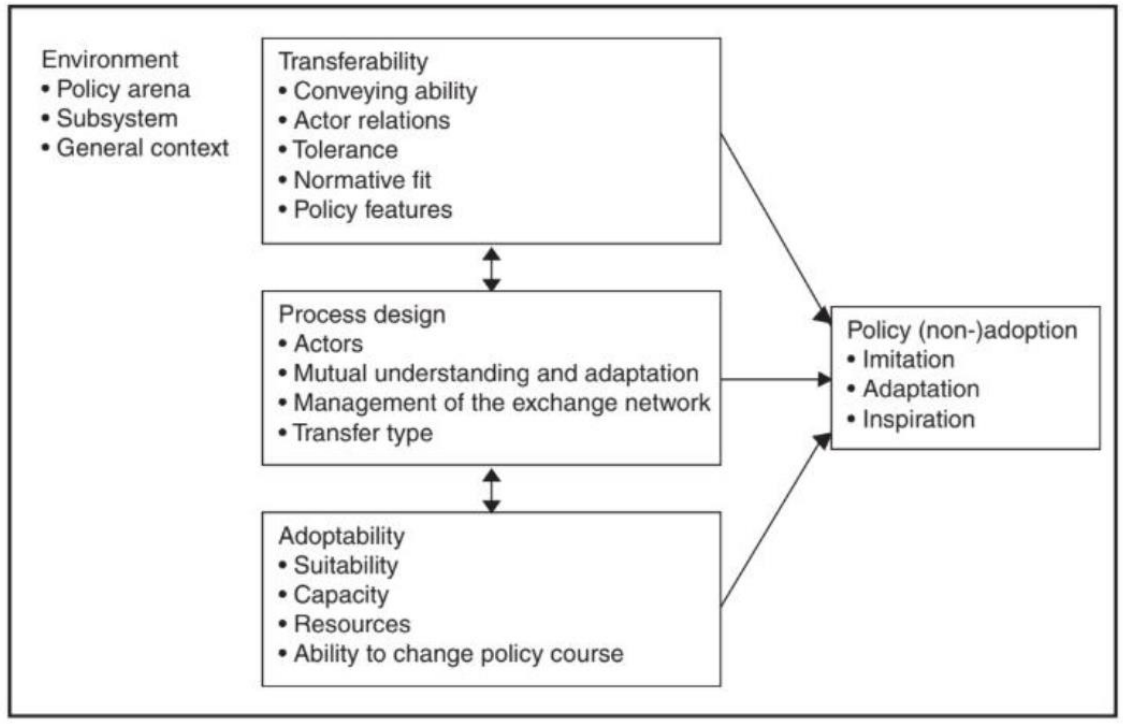


Figure 3. Detailed conceptual framework, based on factors identified in the systematic review.

Case Studies

Cost rental model

Ireland

Austria

State-led frameworks

Singapore

China

Austria → Ireland: cost rental model transfer

Michelle Norris, Bob Jordan & Lucy O'Hara: Systemic transformation or scheme adaptation? Transferring affordable housing policies between Austria and Ireland, International Journal of Housing Policy

INTENDED: SYSTEMIC TRANSFER

Transfering the full Austrian cost rental system to turn Ireland's "dual" rental market into a "unitary" one.

RESULT: SCHEME TRANSFER

An intermediate rental tenure for households who are above the income limit for social housing but unable to buy or rent on the market.

01 **2004–2018**

Debating systemic reform

The National Economic and Social Council (NESC) reports argue for a unitary rental system; politicians not yet involved.

02 **2019–2020**

Policy window opens

Catalysed by the 2019 Vienna Model exhibition in Dublin;

Austrian law translated; cost rental framed as an intermediate tenure.

03 **2021 onward**

Design and revision

Affordable Housing Act 2021; repeated increases in state subsidy; state loans raised from 30% to 55% of costs.

Austria → Ireland: the copy and its cost

Design principle	Austria (Vienna)	Ireland	Fidelity
Providers	Limited-profit associations	Housing associations, LDA	**High**
Target households	Broad: all eligible for social housing	Too rich for social, too poor for market; lottery	**Moderate**
Rent setting	Rents are set to cover costs only; surplus kept in reserves	Costs, at least 25% below market; no reserve requirement, so every new project needs fresh state money.	**Moderate**
Duration	Permanent	Temporary, 40–50 years	**Low**
Finance	Mostly non-state; state loan 30–40%	Mostly state; Cost Rental Equity Loans started at 30% up to 55%	**Low**
Land support	Public land bank, zoning	Land Development Agency assembles land; not yet shared	**Low**

Process

Adoptability: the scheme was built on top of the social housing system. Irish providers were reluctant to put in their own equity, so the state spared them and raised its loans (30% to 55%). The Austrian self-financing logic was lost.

Process: the policy window was short (2019 Vienna exhibition, Act in 2021). Contact with Vienna ended once the Act passed, and the core principles (permanence, financing, land) were not locked in.

Singapore → Guangzhou: a partial transfer

Source: Wei, Z., Chen, T. Chiu, R. & Chan, E. (2017). 'Policy Transferability on Public Housing at the City Level: Singapore to Guangzhou in China', J. Urban Planning and Development, 14, (3)

CORE QUESTION

Can Singapore's successful public housing model travel to a marketized socialist city, and how far?

ANSWER

Only partially: governance, funding and land systems are embedded in different political cultures and urbanization pressures.

Singapore's Housing & Development Board (set up in 1960) houses about 80% of the population, mostly as owner-occupiers.

Since 2000, China's central government has asked local authorities to learn from Singapore's public housing.

What looked possible for transferring:

- One agency running the whole housing cycle
- Compulsory savings that finance flat ownership
- State land acquisition at below-market prices
- High-rise, high-density planning on scarce land

Shared traits made it politically easy: **dominant-party governance, state land ownership, an ethnic Chinese majority, strong bilateral ties.**

Yet only partly applicable: rapid urbanisation and central–local relations differ, rapid urbanisation and a complicated central-local relationship.

Singapore → Guangzhou: what could travel?

The recommendations emphasize centralised power in GZHSO, add resident participation, reform local finance away from land sales, and include migrants.

They conclude that **only technical lessons** such as land-use efficiency transfer easily, and these cannot solve the supply problem alone.

Dimension	Singapore (source)	Guangzhou (receiver)	Transferable?
Governance	Housing & Development Board (HDB): one autonomous agency runs the whole cycle; town councils add resident voice	The Guangzhou Housing Security Office (GZHSO), has less autonomy; work fragmented across departments; no resident channels	**Partial**
Funding	Compulsory Central Provident Fund (CPF) savings, concessionary loans, government grants cover HDB deficit	Housing Provident Fund (HPF) adopted in 1994 but used mainly by mid/high earners; reliance on land lease revenue , which conflicts with reserving land for cheap housing.	**Limited**
Land	1966 Land Acquisition Act: state owns over 80% of land, buys below market	Strict land quotas; only reserved hectares (41%) used for public housing	**Not replicable**
Political context	Housing as a political good; early, gradual scale-up	Quotas ordered from above; seen by local governments as a passing campaign not a long term commitment.	**Weak fit**
Planning	High-rise, high-density to use scarce land	Density can be raised on reserved land	**Yes**

Takeaway from the cases

- Complex, multi-dimensional systems (land, finance, institutions) rarely transfer whole.
- Outcomes depend on adoptability, the political context and which core principles survive adaptation.
- Quick adaptation helps short-term delivery, but altering core mechanisms (no provider equity, reliance on state funds) creates long-term sustainability risks.

Turkish Housing Context

Current situation and challenges on social housing provision

Institutions

- Central government dominance,
- Public Housing Development Administration (TOKİ),
- Limited provision by local municipalities

Tenure

- Social housing is sold to households with an initial payment and monthly installments.
- New rental model: TOKİ's first rental social housing, 15,000 homes in Istanbul. Tenancies last 3 years, non-renewable; the home is then re-let.

Actors

- Non-profit and non-governmental organisations, cooperatives, land-trusts **are not existing/involved** in the social housing context.

Turkish Housing Context

How, and which parts of, international practices can be adapted to Turkey's housing challenges? European, Asian,… experiences ?

Institutions

Municipal housing companies: empower metropolitan and district municipalities to deliver. Local authorities – Çeşme Municipality

TOKİ as facilitator: from sole developer to land allocation, infrastructure finance and standard-setting.

Actors

Cooperatives and limited-profit associations: re-engage them under new rules, with surplus reinvested in rental units (Austria, Spain, Switzerland…).

Land trusts and civil society: foundations, tenant unions and NGOs

Environment

Revolving social housing funds: earmark tax revenue and land value capture for building and long-term management, not one-off build-and-sell.

Social rental legislation: legal definitions, allocation criteria, rent caps.

Conclusions and the way forward

Next steps in the research

- Testing transferability of actors/models/practices
- Potential countries/cities to adopt (comparative housing research, case studies analysed by Minkman’s framework
- Context which could have potential for Turkey
- limited-profit providers, land trusts, cooperatives, funding schemes
- Building the framework and stakeholder model; following the rental pilot
- Complex systems rarely transfer whole; adoptability and context decide what survives
- Core principles (permanence, land, finance) matter the most.