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Contemporary Shelter in the Built Environment: A Comparative Review of Social Housing Schemes in Selected European and African Nations

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Abstract. Social Housing remains highly essential in providing affordable shelter in urban and peri-urban settlements. However, pressures from liberalisation, public expenditures, and privatisation continue to threaten its availability. This paper reviews contemporary social housing trends and compares Europe's established social housing scheme to Africa's emerging schemes. This was achieved by identifying the similarities between social housing in the UK and the Netherlands and social Housing in Nigeria and South Africa and identifying the differences between them. Relevant literature was reviewed to give a detailed but straightforward account of the Netherlands, UK, South Africa, and Nigeria based on allocation policy, target occupants, ownership scheme, mode of finance, and the challenges faced. The studies conclude that there are more similarities between social Housing in Europe and Africa than differences. However, the most fundamental difference is the type of challenges they face. The challenges observed in Europe's social housing schemes are social problems such as segregation and bad public image. In contrast, Africa's social housing challenges are socio-economical in terms of lack of funds, poor planning, and implementation of policies. The outcome from this study is targeted at promoting the implementation of sustainable social housing schemes at the policy level.

Keywords: Social Housing, Urban shelter, Housing schemes, Housing policy.

1. Introduction

Shelter is the second most crucial need of man after food. The urgency of providing safe, inclusive, resilient, and sustainable cities necessitated the inclusion of 'Sustainable cities and communities' amongst the Sustainable development goals [1]. In a report by [2], housing is identified as more than just a physical system but a social system that plays a significant role in achieving sustainable development. As a key player in the housing sector, the government is crucial to supporting sustainable housing development. A key instrument used to facilitate sustainable housing development is the supply of social housing.

Social Housing is an umbrella of several definitions that vary according to the context of its use and the factors and actors involved in its production and execution. According to [3], the lack of proper understanding of the social housing system has impeded the proper discussion on its merits and demerits. Therefore, this article defines social housing as a housing solution provided by the government and her agencies, private developers, or a combination of both; in response to the housing deficit and need of a target group of people; through the production and delivery of affordable housing at a price far below its market value; with its distribution and assess influenced by government policies, agendas and criteria. This definition also includes incentives provided, such as lands or serviced areas given to no or low-income earners to combat the housing deficit in a state or nation; this is the basis on which social housing in the selected countries will be compared.



The housing sector can be a significant source of inclusive growth because it is labor-intensive. It also can spur economic growth and reduce and palliate income disparities [1]. Thus governments, their agencies, estate developers, or other private entities may provide incentivised social housing or a combination of different entities to form partnerships. It may involve target groups categorised according to family size, income, ethnicity or nationality. It could also involve rentals or owner occupier rentals. This signifies that social housing may take on any form of delivery according to the country's policy responsible for its production and distribution.

There is a severe housing deficit in Africa. Birth rates are continually rising, and African households are becoming larger and younger. Unfortunately, in Sub-Saharan Africa, urbanisation has not equal per capita income growth as observed in global trends. Due to increasing urbanisation and a lack of urban planning, there is a significant disparity between households and permanent dwellings. Consequently, Affordable Housing is one of the measures used by governments use to curb homelessness in sub-Saharan Africa [1,4–6]

However, while some governments see it as an investment and a social responsibility to citizens, others see it as a social burden [2,7]. Thus, this paper aims to review contemporary social housing trends and compare Europe's established social housing scheme to Africa's emerging schemes. This is achieved by carrying out a comparative analysis on four selected countries; UK and Netherlands social housing schemes on the side of Europe and Nigeria and South Africa's social housing programs on the side of Africa. The study adopted a case study approach was used to allow a detailed assessment of the countries. Therefore, these countries were selected to represent the idea of social Housing in Europe and Africa. In order to achieve the aim of this paper, the study was conducted to answer the following questions:

What are the similarities between social Housing in UK and Netherlands and social Housing in Nigeria and South Africa?

What are the differences between social housing in the United Kingdom and the Netherlands and social Housing in Nigeria and South Africa?

As a result, the objectives of this study are to:

Identify the similarities between social housing in the United Kingdom and the Netherlands and social Housing in Nigeria and South Africa.

Identify the differences between social housing in the United Kingdom and the Netherlands and social Housing in Nigeria and South Africa [8].

Like UK and Netherlands in Europe, Nigeria and South Africa are among the countries with the largest economies in Africa. Also, UK and Netherlands are among the most populated countries in Europe as Nigeria and South Africa are some of the most populated countries in Africa [9]. Also, UK and Netherland were chosen because they had social housing schemes that have been extensively written about by several authors [3,10–12]. Alternative, Nigeria and South Africa were selected because aside from being highly populated, they had both been colonised by UK and Netherlands, respectively. Hence the scope of this study was limited to these countries. Therefore, this comparative review between Europe and Africa's social housing is based solely on the information available on these four selected countries.

The study's outcome has implications for formulating and implementing housing policies for developing sustainable housing solutions. The study findings are also useful resource materials for assessing the cause of failed social housing schemes by viewing them in the light of specific factors which are stated in this paper. The study is also of immense value to students, educators and researchers as they can build upon its content and compare more countries on other continents. The manuscript's contents are grouped under the following subheadings: abstract, introduction, literature review, methodology, results and discussion, conclusion and reference.

2. Literature Review

2.1. Characteristics of Social Housing

According to Tunstall & Pleace [13], social Housing is Housing rented to people who demonstrate housing needs at rents below market prices by local housing authorities or associations. It should also be noted that where the government is not directly responsible for the provision of housing, organisations that provide social housing receive subsidies from the government and other forms of support. Similarly, the [14] states that in various countries, social housing is influenced by demography, administration, politics, and government housing policy. These factors shape the aims, features, and role of social housing. Also, the Organisation for Economic Co-operation and Development (2021) investigated any form of social housing in 32 countries. The organisation reports that several countries have more than one housing typology, and these different typologies respond to various factors such as target group, financing arrangements and administrative procedures [15]. However, based on the study of these authors, some key factors have been identified to be shared in most of the definitions of social housing. Albeit used with the absence of one or more of these factors for the definition of the social housing system, the criteria identified will serve as tools for describing, defining and understanding the system in the context of this paper. The factors are the type of tenure, the intended target group, the type of provider, Public intervention and subsidies.

2.1.1. Allocation policy

The Economic Commission for Europe [14] states that social housing is an instrument for implementing social housing policy which is the legislation regarding the provision of shelter. This refers to government measures, legislation, and legal actions that directly or indirectly impact housing availability, delivery, demand, and supply. Allocation policy refers to the criteria for allocating social housing or the stipulated requirements for assessing it. Countries in Africa have not experienced overall success in terms of provision and allocation policy relating to social Housing (or sometimes referred to as public Housing in some literature). Many African cities have urban plans that rely on poor planning policies and zoning restrictions used in the United Kingdom or France in the 1940s and 1950s. These plans are typically used fraudulently and irregularly to evict the poorest urban residents and release land for special needs and often fail to consider the social, demographic, and economic transformations in cities in previous decades. New ideas are mainly galvanised by intercontinental cities in wealthier nations and fail to take local circumstances into cognizance [1]. The Housing policies in countries like Cameroon, Burkina Faso and Mauritania, for instance, have exhibited a similar pattern in the provision and distribution and management of social housing. First, there is government intervention resulting in the construction of housing complexes. After which, the housing mainly constructed for civil servants are usurped by the middle and upper classes since the cost of the dwellings are too high for the intended users. Next, there is the abandonment of these dwellings by the government. Finally, a resuming to the management of urban settlements, while partnering with private investors, the resultant social housing is based on small-scale projects resulting in homes that are too expensive to be defined as social housing by most of Europe's standards [16].

2.1.2. Target Occupants

This has to do with the intended group of tenants or owners for which the social housing was built. Access to social housing is controlled by eligibility requirements, with some countries assigning units to priority cases [17]. Usually, it would involve low-income earners, medium-income earners, immigrants, displaced persons, persons seeking asylum, disabled persons and old/retired citizens. Typically, those who require aid in securing accommodation or face the risk of eviction or homelessness. Although the size and structure of housing structure differ across countries, the demographics of its residents are very similar [7]. In many countries, specific criteria are used to ascertain those who may stay in social housing, and these eligibility criteria may be more or less restrictive depending on the country [15]. These criteria are usually based on income, nationality, household characteristics (see Table 2.1). However, income level is the most common criterion used to determine eligibility. In many countries, social tenants have lower incomes than the general average, resulting in an increasingly sharp divide between social housing and other housing stock [7,17].

Due to this, a few countries such as Northern Ireland and Scotland (the United Kingdom), Austria, Denmark, Finland, and France have increased the income threshold of eligible tenants to encourage integration and discourage segregation among the various income groups [17].

Table 2.1: Eligibility criteria used by different countries
Criteria assessed in selecting eligible households

	All are eligible	Income threshold	Citizenship/ Perm. Resid.	Local residency	Employment	Disability	Other
Australia	No	Yes	Yes	Yes	No	No	Eligibility criteria for social housing is determined by state and territory housing authorities and varies between states and territories.
Austria (1)	No	Yes	Yes	Yes (Vienna)	No	No	
Belgium	No	Yes	Yes	No	No	No	Applicants must not in possession of property rights.
Bulgaria	No	Yes	No				
Canada (2)	No	Yes	No	Yes	No		Priority allocation varies by specific social housing programme applied for.
Colombia	No	Yes	Yes	No	Yes	Yes	Victims of forced displacement, informal sector workers, elderly, members of ethnic communities, people with disabilities, members of the public force and their families when the member of the public forces has died in service.
Czech Republic	No	Yes	No	No	No		Unsatisfactory dwelling before entering social housing.
Denmark	Yes						
Estonia	No	No	Yes	Yes	No	No	
Finland (3)	Yes	No					Household selection based on suitability and financial needs assessed on the basis of the applicant's housing needs, wealth and income.
France (3)	No		Yes				
Germany (3)	No	Yes	Yes				Legal residency of at least one year.
Hungary	No	Yes	Yes	Yes		No	Rents and eligibility conditions are regulated by a decree of the municipalities.
Iceland (3)	No	Yes	Yes				
Ireland	No	Yes	Yes	Yes	No	No	
Israel	No	Yes	Yes	No	No	No	
Japan (3)	No	Yes	Yes				
Latvia	No	Yes	Yes	Yes	No	Yes	See priority cases in PH 4.3.5
Lithuania	No	Yes	Yes	Yes	No	No	
Luxembourg (3)	Yes	No	No				
Malta (3)	No	Yes	Yes				
Netherlands	No	Yes	Yes	Yes	No	No	
New Zealand	No	Yes	Yes	No	No	No	
Norway	No	Yes	Yes				Housing situation is a criterion as well, in terms of citizenship, there are exceptions for some refugees.
Poland	No	Yes					Income thresholds and any additional specific criteria are set by the municipalities.
Portugal	Yes						
Romania	No	Yes					
Slovak Republic	No	Yes	No	No	No	No	
Slovenia	No	Yes	Yes	Yes	Yes	Yes	
South Africa	No	Yes	Yes				
United Kingdom: England	No	No	No	No	No	No	Application is open to all British citizens who have the right to stay in the UK for an unlimited time.

							Allocation by local authorities according to own criteria.
United States	No	Yes	No		No	No	Eligibility for HUD rental assistance is generally based on income. Additional admissions preferences can be set by state and local housing agencies, pursuant to federal requirements.

Notes: Empty cells are missing information or QuASH responses stating uncertain.

1. Municipality housing in Vienna requires local residency for 3 years.

2. Canada: Eligibility is determined by the First Nation governments when programmes are delivered On-Reserve. A Tenant Selection Criteria, shared with all members, is a requirement of the programme.

3. Responses (partially) based on replies to previous QuASH rounds.

Source: OECD, 2021 [15]

2.1.3. Mode of Financing

This refers to the housing providers and their means of financing or subsidising costs (if it is not the government). Scanlon, Fernandez and Whitehead state that the two main types of owners of social housing are: Local authorities and charity organizations [7]. In some countries, all social housing is owned by non-profit organisations; an example of such a country is Denmark. However, all social housing is owned by the local authorities in the Czech Republic. Most countries have a mix of both private and state-owned social housing. In Africa, countries like Ethiopia, Ghana and Nigeria [1,18].

Interestingly, Germany and Spain are few countries with all social housing stock owned by private landlords subsidised by the state [7,14]. However, the OECD [15] indicates that social housing is defined by the providers of the housing stock in some countries. For example, in Korea and Japan, social rental housing (which is synonymous with social housing in most countries) refers to rental housing that is publicly provided. Although in countries like Netherlands and Denmark, social housing is provided by non-profit organisations. From the above, it can be deduced that there is a vast range of social landlords. These landlords could be public (state government, municipalities, public-owned companies) or private (non-profit organisations; real estate companies, which maybe in partnership or not and sometimes even individuals) [14].

The Economic Commission for Europe observed that former socialist countries or countries with social housing targeted at the poorer population tend to have public landlords. Furthermore, the commitments that characterise social housing might be mandated by legislation or through a form of contract. For instance, the government charges a company to build public housing as a civic duty or in return for other favours. These commitments can be for the short or long term or for an unlimited amount of time. Subsequently, the availability of a wide range of financial solutions for housing is not a surprise. They range from allowance provided in a centralised budget (National budget) to financial solutions from private entities. A mix of funding is possible when considering funding an instrument such as social housing. Subsidies can be granted through tax relief or direct support from a National or local budget may give subsidies through tax relief as a one-time agreement or for many years. In summary, a long-term investment like social housing is financed through a mixture of funds which may consist of subsidies, loans, bonds and private funds [14].

2.1.4. Ownership scheme

This refers to the type of ownership scheme or tenure employed by the social housing provider. This could be rental housing where the occupants pay rent to a publicly accountable landlord; or cooperative ownerships that allows civil servants, teachers, nurses and others to own houses through their cooperative society. It could also be owner-occupied housing where members of the housing target group can purchase housing at a subsidised rate with or without a mortgage. In general, countries with a medium or high percentage of social housing stock such as Denmark, Austria and Netherlands tend to have a higher level of rental social housing than countries with little or no public recognised social housing sector [7]. Those in the 'low' groups (of social housing stock), such as Spain and Ireland, have emphasized funding owner-occupied housing rather than subsidised rental housing. For instance, Spain has 2% social housing stock,

and Ireland with 9% social housing stock have 85% and 70% of Owner-occupation, respectively. A similar instance can be observed in Chile, Turkey and Mexico that do not have social housing because the housing solutions encourage low-cost homeownership [7,15]. In Turkey, what can be referred to as the sales of homes characterise social housing at a lower price to low-income households by the Housing Development Administration of Turkey.

2.1.5. Challenges faced

These are the areas for further improvement for the housing policy that directs the production and distribution of social housing. It also looks into areas of concern to the providers of these systems. The challenges experienced by different countries vary from country to country. However, some can be generalised such as affordability. Social Housing is an instrument used to provide shelter primarily for the disadvantaged; however, these society members experience difficulty obtaining the means to pay even the subsidised rent. However, due to the United Nations, new programs, on the other hand, are demonstrating the potential for providing dependable and non-profit financing (mortgages and loans) to the poorest populations who invest a large portion of their revenue in improving their living conditions [17,19].

The COVID-19 pandemic also emphasised the specific quality gaps facing many households, thereby indicating the importance of making social housing construction and renovation a central part of the economic recovery of many countries. Segregation has also been a significant challenge for many social housing programs. The sector has steadily become home to a higher concentration of lower-income and a lower mix of income levels. This is a significant concern because social integration is an essential objective of the social housing sector in most countries. Also, a concentration of vulnerable tenants' risks economic sustainability, leading to an increasing spatial concentration of poverty and disadvantage. This is partly due to a decline in government investment in housing stock [17].

3. Methodology

The study adopted a case study approach. A stratified sampling method was used to select the case studies arriving at two countries from Africa and Europe. The sample frame from which the European countries comprised of countries with large and medium housing stock only. This was done to obtain a high standard of social housing in Europe to compare their former African colonies. The research used a review method, using educational materials and policy-oriented research covering Europe and Africa published since 2006 till date, where available. The following factors were examined across the countries of interest; Allocation policy, Target occupants, Ownership scheme, Mode of finance and the Challenges faced. The case studies were then compared against each other to find similarities and differences.

The Organisation for Economic Co-operation and Development (OECD) comprises 38 member countries discussing and developing economic and social policies such as housing. Below is a list of European countries that belong to the OECD. The countries' population size data was retrieved from the UN - Department of Economics and Social Affairs, 2019 because it is the most recent document on the population of all countries released by the UN.

Table 3.1. Countries with Large Social Housing stock (with a minimum of 20% of total dwelling units)

	Countries	Population Size (x 1000)
1,	Austria	9,006
2.	Denmark	5,792
3.	Netherlands	17,135

Source: OECD (2020) [17]; United Nations – Department of Economics and Social Affairs, 2019 [9]

The above table shows that the Netherlands was selected because it is the most populated in the group of countries.

Table 3.2. Countries with Moderate Social Housing stock (with social housing between 10% and 19% of total dwelling units)

	Countries	Population Size (x 1000)
1.	Iceland	341
2.	Ireland	4,938
3.	Unite kingdom	67,889
4.	Finland	5,541
5.	France	65,274

Source: OECD (2020) [17]; United Nations – Department of Economics and Social Affairs, 2019 [9]

The above table shows that the UK was selected because it is the most populated in the group of countries.

Table 3.3. African countries colonised by the Netherlands (Dutch)

	Countries	Population size (x 1000)
1.	Cote d'Ivoire	26,378
2.	South Africa	59,309
3.	Angola	32,866
4.	Namibia	2,541
5.	Senegal	16,744
6.	Ghana	32,073

Source: United Nations – Department of Economics and Social Affairs, 2019 [9]

The above table shows that South Africa was selected because it is the most populated in the group of countries.

Table 3.4. African countries colonised by UK (England)

	Countries	Population size (x 1000)
1.	The Gambia	2,417
2.	Nigeria	206,140
3.	Ghana	31,073
4.	Cameroon (Southern Cameroon)	26,546
5.	Sierra Leone	7,977
6.	Kenya	114,964
7.	Uganda	45,741
8.	Tanzania	59,734
9.	Zambia	18,384
10.	Zimbabwe	14,863
11.	Malawi	19,130
12.	Lesotho	89,561
13.	Botswana	2,352
14.	Eswatini	1,160
15.	Sudan	43,849
16.	South Africa	59,304

Source: United Nations – Department of Economics and Social Affairs, 2019 [9]

4. Results and Discussion

4.1. Netherlands

The Netherlands has been one of the most dynamic and innovative countries in terms of social housing in Europe. It has one of the most extensive social housing stocks. The Netherlands is responsible for 32% of the total housing stock in the country [7,15,17]. However, the Netherlands has no fixed definition of social housing. The Dutch Housing Act of 1901 offers a legal framework for making social housing available [11]. This resulted in the first planned social housing in the country. They were initiated to eradicate urban blight and slums under the 1901 Dutch Housing Act law. The central government provided grants and credits for social rented housing construction. Housing associations were responsible for constructing these apartments, which the district government further supplemented. However, in 2010, a European housing decision caused the social housing system in the Netherlands to be redefined as the distribution of housing at a lower cost to a disadvantaged specific group of people or socially underprivileged groups, also to specific brackets of primary workers whereby the public authorities define the underprivileged groups (who are those in the groups) or type of service rendered by the primary workers. In other words, the criteria for allocation may vary according to regional laws. Although, it is worthy of note that in the Netherlands, social housing was never limited by income or any other requirement until 2010 [11].

Since 1993, social housing organizations have had autonomy financially from the Netherlands government. The economic environment provided regulation for rent prices and guaranteed capital market loans. More specifically, registered social housing organisations can gain from a trio of categories making up the security structure, and the first is the Central Fund of Social Housing. This independent public body oversees an organisation's financial situation and intervenes to assist organisations with financial challenges. Another security instrument is the Guarantee Fund for Social Housing. It is a private association founded by other housing associations to serve as a solidarity fund. The mutual guarantee provided by this Fund allows social housing organisations to take advantage of favourable terms and interest rates when funding their activities on the open capital market. If both tools are insufficient to solve an organisation's financial challenges, the state and local governments can step in as a last recourse. Most Dutch social housing consists of rental homes owned by housing associations [11].

Different urban planning regulations exist in the Netherlands to provide inexpensive housing and distribute it fairly among its cities and regions. Even in the Netherlands, though, establishing a diverse and inclusive neighbourhood is a difficult task that requires both careful design and community participation [20].

4.2. United Kingdom

Local governments, housing associations, and, to a lesser extent, non-profit organisations own social Housing in the UK. It is primarily rented to low-income households (as defined by municipal governments) at cheap rents (as defined by the central government). Public landlords progressively own other forms of housing, while other landlords provide a growing number of inexpensive dwellings [15].

In the last 60 years, the public's image of social housing has shifted dramatically and its purpose. In the mid-twentieth century, social housing was an essential aspect of the English housing and social welfare system, distributing good-quality dwellings to (mainly) working families. The postwar era was a golden age for social housing construction. In England, local administrations built 87 percent of new dwellings in 1950, while local authorities' proportion of new homes varied around 40 percent in the 1960s and 1970s. The social housing sector persisted in its growth, and until 1979, housing associations (mainly non-profits) were minor players [12].

In summary, social housing providers are classified into two types: Local governments and private registered providers. Local Authority (LA), Commonly known as "council housing", is social housing provided directly by Local A providers of social housing who are not LAs and are authorities [21]. Private Registered Provider (PRP), commonly known as "housing associations", are registered with the social housing regulator; they are private organizations. Over the last two decades, the non-profit sector has been

the primary agent for developing new social housing in England. With the transfer of local authority social housing ownership to new housing associations, the sector has grown significantly [14].

In terms of accessibility, affordable rental housing is provided for rent at a rate lower than the market rate, with guidelines in place to guarantee that it serves people whose needs are just not adequately met in the commercial housing market. Low-cost homeownership housing is accessible through equity percentage agreements, shared ownership arrangements, or trusts [15].

However, one of the dominant challenges associated with social housing in recent years is the perception of challenging social housing due to some estates that have had issues in the past with Vandalism, poor reputation, empty homes, low-quality environments, crime and poor reputations, concentrations of people out of work or on low incomes, flawed construction, rent arrears, problematic design, absence of facilities and poor locations. A researcher in 1979 defined some estates as “difficult to let, tough to live in, and occasionally difficult to get rid of.” The extreme cases came to characterise the entire sector in the eye of the public, and these impressions of community-dwelling have persisted for tens of years. Several studies have found that negative attitudes toward social housing and its residents are not representative of reality; nevertheless, they have had a more significant impact on local and national policy than exact data [13].

4.3. South Africa

In South Africa, the Social Housing Regulatory Authority manages social housing, which provides rental or cooperative housing options. According to the SHRAM, Rental Housing for the higher echelon of the low-income market is provided by Social Housing (R1500 - R15 000). The primary goal of urban restructuring is to create sustainable human settlements [22].

Since 2006, when the National Department of Housing assigned the Social Housing Foundation as the agent responsible for managing and disbursing the Restructuring Capital Grant until the Social Housing Regulatory Authority (SHRA) was established, the Interim Social Housing Programme (ISHP) has been in place. It was supposed to be a one-year experimental program, but it has already outlived its usefulness. There were three funding cycles (2006-2010). This has meant that the South African social housing sector is immediately motivated, eager, and capable of delivering on a colossal scale [23]. Until now, the social housing market has been characterised by the standard subsidy beneficiary criteria outlined in the housing code, primarily perceiving the market in terms of subsidy income groups. The income of occupants determines the target occupants of the social Housing in South Africa. For example, if the subsidy income band is R3500 - R7500, those whose income falls within this range will be eligible for housing subsidy [24].

The problems in South African social housing are caused by a narrow income subsidy band coupled with a limited grant program (the existing Institutional subsidy mechanism). As a result, social Housing in South Africa caters to a particular specific market group. Because the pool of subsidised beneficiaries (those who fall under the income subsidy band) is tiny, this has substantially impacted social housing institutions' ability to conduct long-term operations. Furthermore, social housing has not expanded the possibilities available to individuals in the lowest subsidy categories due to the limited market segment. As a result, there is a perception that social housing is only for a small, considerably privileged elite which does nothing to address South Africa's housing crisis [25].

4.4. Nigeria

Nigeria's housing policy is as old as the country itself. Thus, the colonial period (before 1960), the post-independence period, the second civilian administration, the military era, and the post-military era can be generally characterised (after 1999) from 1999 until the present. At the time, the focus of policy was on providing expatriate housing and certain indigenous personnel in the railways, sea, police, and military services. The actual steps taken are the construction of senior public servant quarters in Lagos and regional headquarters in Ibadan, Kaduna and Enugu, including rent rebates and home mortgages. [25]. The government's delusory belief from 2000 to 2018 was that the country's housing shortfall was due to affordability rather than availability. Despite this, the current strategy views the private sector as the

essential answer to the country's housing needs, with the government acting as a facilitator and enabler. The fundamental purpose of the national housing strategy was to make adequate housing accessible and affordable to all Nigerians. Land ownership, housing financing, home building, and housing distribution were all addressed in the policy.

Governments have supplied Low-income estates at all levels, whether federal, state, or local, to meet the housing needs of low-income earners. One of the resulting home developments is the Obasanjo Housing Estate in Ado-Ekiti, Nigeria. The estate was built as part of President Olusegun Obasanjo's 1999-2006 Presidential mandate, which called for 500 housing units in each of Nigeria's thirty-six states and the Federal Capital Territory. These housing developments have only been completed in a few states. Another example of housing intervention in social housing but initiated by the state government is the 30,000 housing units built under Lateef Jakunde in Lagos during his regime as governor (1979-1983) [26].

Inadequate policy design and implementation research, insufficient funding, insufficient infrastructure facilities, and ineffective financing challenges national policy implementation. On the other hand, a housing policy requires a plan to ensure that the specified action programs are carried out. The problem is that when a new government adopts a new policy, it frequently abandons earlier government-initiated programs, resulting in a waste of resources, sluggish social housing construction, and unsustainable housing delivery [27].

4.5. Discussion

Table 4.1. Features of Social Housing in selected markets

	UNITED KINGDOM	NETHERLANDS	SOUTH AFRICA	NIGERIA	LIBERIA
Allocation policy	Influenced by parliament and International Organisation	Structured policy based on a provision in the constitution	The National Housing Code	National housing policy but still dependent on the political interest of the current political leaders	
Target Occupants	Low-Income Earners	Previously all citizens. Since 2010 low-Income earners	Low and medium-income earners (those that fall within the income subsidy band).	Low-income earners.	
Mode of financing	Housing Associations and Local authorities	Charity Organisation. Privately Financed	Housing associations and sanctioned Government housing authorities	Government and her Agencies, Public-Private partnership	
Ownership scheme	Majority of Rental Housing and Minority of Owner-occupied housing.	Majority of Rental Housing and Minority of Owner-occupied housing.	Rental Housing.	Owner-occupied Housing	
Challenges	Negative public image associated	Difficulty in creating	The beneficiaries of	Poor policy definition,	

with social housing.	Inclusive neighbourhoods	social housing are few, thus resulting in financial difficulties for housing associations.	structure and execution combined with a penchant for abandoning projects. Low funding and poor funds management
Flawed construction or housing quality			Corruption leads to poor housing quality.

From the above, certain information can be deduced. First, Housing in Europe and social Housing in Africa share two similarities: the mode of finance, the basis of their allocation policies. All four countries possess government-owned social Housing and private-owned social Housing (although subsidised by the government). All the countries have the basis of their housing policies in their law or in the form of constitutional authority. However, the most glaring similarity between the countries' social housing is their chosen target groups. The countries all provide social housing to low-income households. Although South–Africa pointedly states that its social housing provisions are targeted at the “upper” spectrum of the low-income target group.

On the other hand, there are some differences among the countries. In terms of ownership schemes, the Netherlands and the UK, although having mixed tenure, are predominantly rental schemes. South Africa uses a purely rental scheme, while Nigeria uses owner-occupied housing. Additionally, the challenges faced among the countries differ. While the challenges faced by the European countries are social, such as segregation and poor public image, the challenges faced by the African countries are socio-economical: lack of funds and proper planning.

5. Conclusion

The paper surveyed the social housing history and trends in Europe, concentrating on two major countries—England and Netherlands and comparing the data received from these countries to compare the social Housing in Africa using Nigeria and South Africa as case studies. In order to achieve this, the paper looked at the trends in social housing in the four countries. It arrived at some similarities and differences in their various social housing systems by reviewing available literature. It was concluded that Countries in Europe have more effective housing policies, which are also facilitated by some international organisations (EU, OECD) to which the countries belong. Unlike countries in Africa where the struggle to eradicate homelessness through social housing appears to be individual to each country—lacking common housing policy and agendas. Coupled with the unstable political atmosphere of most African countries, achieving a singular objective of bridging the gap created by the housing deficit is difficult. Funding is also a significant problem for African countries. The construction cost is very high, and the housing demand is also high due to exponential urbanisation growth. This study concludes that for countries in Africa to catch up with social housing practices in Europe, comprehensive and extensive planning must be carried out at the national and sub-continental levels (ECOWAS, AU). It also encourages future studies to compare other countries in Africa against countries in the developed world to identify patterns in foreign social housing trends that may be useful in developing a sustainable housing solution to homelessness. The paper also encourages the study of small scale social housing in Europe.

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