



EU-ASE's Response to Open Consultation

Open Public Consultation on the European Affordable Housing Plan

Fields marked with * are mandatory.

Introduction

Housing affordability has become an increasingly widespread and urgent issue across Europe. Rising house prices and rents, interest rates, utility and renovations costs are affecting both low- and middle-income households, particularly in major cities and other growth poles. Vulnerable people suffer disproportionately from this situation, especially if they cannot access social housing and there is increased homelessness. Housing costs can also represent a major challenge for families, young people and those working in essential sectors such as healthcare, education, etc. A lack of affordable, sustainable and decent housing units, including from new construction, is hampering individual life chances, labour mobility and educational opportunity, hurting economic growth, competitiveness and social cohesion. Insufficient renovation and not making the most of existing building stock has a negative impact on achieving climate and energy goals.

Although mainly a Member State, regional and local competence, the European Commission plans to assess where added European value can be found by developing a new European approach to affordable and sustainable housing. To do this, the Commission is setting up a broad consultation - the affordable housing dialogue - to explore drivers of the current challenges, their impacts on various groups and sectors, and gather insights on potential solutions, including best practices.

The Commission seeks input from citizens and a wide range of stakeholders to help identify where EU-level action would add the most value. This public consultation, alongside expert seminars, workshops, and other themed consultation events will feed into the European affordable housing plan planned for adoption in the first quarter of 2026.

The public consultation on affordable housing consists of two sets of questions. One for the general public and one for public authorities, companies, associations and other stakeholders. You automatically receive the questions based on the information you provide in the following section 'About you'.

A summary report will be published on the consultation page within 8 weeks after the closure of the public consultation. Moreover, a summary of the replies will be prepared.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business

- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Luigi

* Surname

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luigi@bs-europa.eu

* Organisation name

255 character(s) maximum

European Alliance to Save Energy (EU-ASE)

* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

37816636575-51

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|---|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ Samoa |
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| ☐ Andorra | ☐ El Salvador | ☐ Madagascar | ☐ São Tomé and Príncipe |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malawi | ☐ Saudi Arabia |
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| ☐ Antarctica | ☐ Estonia | ☐ Maldives | ☐ Serbia |
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| ☐ Argentina | ☐ Ethiopia | ☐ Malta | ☐ Sierra Leone |
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| ☐ Aruba | ☐ Faroe Islands | ☐ Martinique | ☐ Sint Maarten |
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| ☐ Austria | ☐ Finland | ☐ Mauritius | ☐ Slovenia |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Solomon Islands |
| ☐ Bahamas | ☐ French Guiana | ☐ Mexico | ☐ Somalia |
| ☐ Bahrain | ☐ French Polynesia | ☐ Micronesia | ☐ South Africa |
| ☐ Bangladesh | ☐ French Southern and Antarctic Lands | ☐ Moldova | ☐ South Georgia and the South Sandwich Islands |
| ☐ Barbados | ☐ Gabon | ☐ Monaco | ☐ South Korea |
| ☐ Belarus | ☐ Georgia | ☐ Mongolia | ☐ South Sudan |

☒ Belgium	☐ Germany	☐ Montenegro	☐ Spain
☐ Belize	☐ Ghana	☐ Montserrat	☐ Sri Lanka
☐ Benin	☐ Gibraltar	☐ Morocco	☐ Sudan
☐ Bermuda	☐ Greece	☐ Mozambique	☐ Suriname
☐ Bhutan	☐ Greenland	☐ Myanmar/Burma	☐ Svalbard and Jan Mayen
☐ Bolivia	☐ Grenada	☐ Namibia	☐ Sweden
☐ Bonaire Saint Eustatius and Saba	☐ Guadeloupe	☐ Nauru	☐ Switzerland
☐ Bosnia and Herzegovina	☐ Guam	☐ Nepal	☐ Syria
☐ Botswana	☐ Guatemala	☐ Netherlands	☐ Taiwan
☐ Bouvet Island	☐ Guernsey	☐ New Caledonia	☐ Tajikistan
☐ Brazil	☐ Guinea	☐ New Zealand	☐ Tanzania
☐ British Indian Ocean Territory	☐ Guinea-Bissau	☐ Nicaragua	☐ Thailand
☐ British Virgin Islands	☐ Guyana	☐ Niger	☐ The Gambia
☐ Brunei	☐ Haiti	☐ Nigeria	☐ Timor-Leste
☐ Bulgaria	☐ Heard Island and McDonald Islands	☐ Niue	☐ Togo
☐ Burkina Faso	☐ Honduras	☐ Norfolk Island	☐ Tokelau
☐ Burundi	☐ Hong Kong	☐ Northern Mariana Islands	☐ Tonga
☐ Cambodia	☐ Hungary	☐ North Korea	☐ Trinidad and Tobago
☐ Cameroon	☐ Iceland	☐ North Macedonia	☐ Tunisia
☐ Canada	☐ India	☐ Norway	☐ Türkiye
☐ Cape Verde	☐ Indonesia	☐ Oman	☐ Turkmenistan
☐ Cayman Islands	☐ Iran	☐ Pakistan	☐ Turks and Caicos Islands

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|--|-----------------------------------|---|--|
| ☐ Central African Republic | ☐ Iraq | ☐ Palau | ☐ Tuvalu |
| ☐ Chad | ☐ Ireland | ☐ Palestine | ☐ Uganda |
| ☐ Chile | ☐ Isle of Man | ☐ Panama | ☐ Ukraine |
| ☐ China | ☐ Israel | ☐ Papua New Guinea | ☐ United Arab Emirates |
| ☐ Christmas Island | ☐ Italy | ☐ Paraguay | ☐ United Kingdom |
| ☐ Clipperton | ☐ Jamaica | ☐ Peru | ☐ United States |
| ☐ Cocos (Keeling) Islands | ☐ Japan | ☐ Philippines | ☐ United States Minor Outlying Islands |
| ☐ Colombia | ☐ Jersey | ☐ Pitcairn Islands | ☐ Uruguay |
| ☐ Comoros | ☐ Jordan | ☐ Poland | ☐ US Virgin Islands |
| ☐ Congo | ☐ Kazakhstan | ☐ Portugal | ☐ Uzbekistan |
| ☐ Cook Islands | ☐ Kenya | ☐ Puerto Rico | ☐ Vanuatu |
| ☐ Costa Rica | ☐ Kiribati | ☐ Qatar | ☐ Vatican City |
| ☐ Côte d'Ivoire | ☐ Kosovo | ☐ Réunion | ☐ Venezuela |
| ☐ Croatia | ☐ Kuwait | ☐ Romania | ☐ Vietnam |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Russia | ☐ Wallis and Futuna |
| ☐ Curaçao | ☐ Laos | ☐ Rwanda | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Barthélemy | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Helena Ascension and Tristan da Cunha | ☐ Zambia |
| ☐ Democratic Republic of the Congo | ☐ Lesotho | ☐ Saint Kitts and Nevis | ☐ Zimbabwe |
| ☐ Denmark | ☐ Liberia | ☐ Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer**

association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* **Contribution publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Questions for companies, businesses, public authorities, academics, research institutions, NGOs

Please choose the questions that are relevant for you or the sector you represent or work in. You are not obliged to answer all questions, e.g. if you are not concerned by a question or do not know the answer, simply skip the question.

1. What describes your or your organisation's field of work best?

- | | |
|--|--|
| ☐ Finance and investments | ☐ Working with other vulnerable people |
| ☐ Construction and renovation activities | ☐ Tenant organisation |
| ☐ Manufacturing of building and renovation materials or appliances | ☐ Owner organisation |

- ☒ Energy efficiency
- ☐ Commercial housing
- ☐ Social housing
- ☐ Spatial planning
- ☐ Architecture
- ☐ Working with homeless people
- ☐ Education and training
- ☐ Academia and research institution
- ☐ Healthcare
- ☐ Tourism
- ☐ Short-term rental platform
- ☐ Other

2. In which countries do you primarily operate?

- | | | | |
|--|----------------------------------|--------------------------------------|--|
| ☒ All EU Member States | ☐ Denmark | ☐ Italy | ☐ Romania |
| ☐ Outside the EU | ☐ Estonia | ☐ Latvia | ☐ Slovak Republic |
| ☐ Austria | ☐ Finland | ☐ Lithuania | ☐ Slovenia |
| ☒ Belgium | ☐ France | ☐ Luxembourg | ☐ Spain |
| ☐ Bulgaria | ☐ Germany | ☐ Malta | ☐ Sweden |
| ☐ Croatia | ☐ Greece | ☐ Netherlands | |
| ☐ Cyprus | ☐ Hungary | ☐ Poland | |
| ☐ Czechia | ☐ Ireland | ☐ Portugal | |

Affordable and social housing

3. Do you consider that a common definition of affordable housing is needed in the EU?

- ☐ No, there are diverse approaches among Member States also due to cultural preferences or traditions, it is therefore not necessary or possible to have a common definition in the EU.
- ☐ Some degree of convergence is needed in particular when there is public support involved.
- ☐ Yes, a common EU definition of affordable housing is necessary in all areas which would involve EU funding.
- ☒ Other

*Please specify

100 character(s) maximum

4. What would be the most important solution to significantly increase the supply of affordable housing over the short- and medium-term perspective?

Maximum 3 selection(s)

- ☒ Make the construction sector more efficient and competitive
- ☐ Speed up permitting and reduce regulation in construction
- ☒ Repurpose vacant buildings (e.g. from commercial use)
- ☐ Map and reduce the number of homes that are vacant or underused
- ☒ Expand affordable housing stock and improve its functioning
- ☐ Introduce minimum share of units priced below the market rate in new buildings
- ☐ Promote policies to increase the availability of land for residential development
- ☐ Use demand-side subsidies to enable reducing rents below market price e.g. for critical professions or young families
- ☐ Limit short-term accommodation rentals in areas where this limits supply of affordable housing for local people
- ☐ Limit financial speculation in the housing market
- ☐ Other

5. The EU building stock accounts for about 35% of energy-related greenhouse gas emissions also due to insufficient insulation. The use of materials for buildings can have a strong environmental impact. The choice of buildings can also severely affect soil health or water status, as well as the use of land in general. There are concerns that making such buildings more sustainable will make them less affordable.

Can you share good practices on solutions that combine sustainability and affordability?

300 character(s) maximum

Improving energy performance of a building repays itself for several years. It is possible to significantly reduce and optimize energy consumption through EU technologies available at accessible prices and financed with innovative mechanism i.e. EPC that repay the investment with savings.

6. What are the best ways to increase availability social housing*?

**Social housing is aimed at disadvantaged groups and allocated based on specific criteria, such as income, household size or health-related restrictions. Social housing systems and allocation criteria vary across Member States.*

Maximum 3 selection(s)

- ☐ Develop further partnerships with private sector especially with not-for-profit and /or for-limited profit organisations and social investors
- ☐ Promote cooperation with other social economy actors
- ☐ Promote renting mechanisms for social purposes with private owners such as social rental agencies
- ☒ Set up targets for the share of social housing in the local housing stock
- ☒ Increase public support for the development of social housing
- ☒ Plan social housing construction based on the current or projected housing needs
- ☐ Other

7. Do you know of any good or innovative practices that you would like to share on promoting affordable and social housing?

Please provide evidence if available.

300 character(s) maximum

8. What is the potential of cooperative or other alternative housing forms (e.g. community land trust) to increase affordable housing?

Can these approaches be scaled up?

Please provide evidence if available.

300 character(s) maximum

Cooperative could facilitate the renovation of social housing sharing the investments for comprehensive energy efficiency interventions. They could lead to RES and energy efficiency communities and new models for producing and sharing energy, bringing together citizens, companies and institutions.

9. How can the different challenges facing urban and rural housing needs be addressed to improve access to affordable, sustainable and decent housing for all Europeans, including through spatial planning and financial support?

300 character(s) maximum

Urban area offers opportunities as most buildings are inefficient thus EPBD implementation will be crucial to improve the energy performance of houses and lower their energy bills.

Financing

10. What are the biggest financial challenges in getting new affordable housing projects off the ground?

Maximum 3 selection(s)

- ☐ Lack of long-term financing options
- ☒ Difficulty in understanding what financing opportunities are available
- ☒ Difficulties in accessing financial support (e.g. complex and lengthy application processes/lack of capacities)
- ☐ Unprofitable market segment / low returns in comparison to more profitable construction projects
- ☐ High upfront costs of construction, scarcity of materials
- ☐ High upfront costs of land
- ☐ Lack of access to tools that contain risks (guarantees, public co-investment)
- ☒ Other

* Please specify

100 character(s) maximum

Lack of long-term financing schemes creates uncertainty for all and hinder planning and investments

11. What solutions would be most useful in overcoming these challenges for affordable housing projects?

Maximum 3 selection(s)

- ☐ Ensure a level playing field with more profitable construction projects
- ☒ More availability of below market interest loans
- ☐ Risk-sharing mechanisms such as guarantees
- ☒ Combination of financial instruments with grants (blended finance)
- ☐ Equity investments
- ☐ Public-private partnership models
- ☐ Flexible financing options (e.g. longer loan maturities, lower upfront costs)
- ☐

Setting access rules for private investors and reserve a share of the building units for buyers with income below a certain ceiling

- ☒ More technical assistance for project development
- ☐ Promotion of new institutional actor, such as Limited-Profit Housing Associations, cooperatives, etc.
- ☐ Other

Please provide details and evidence if you have experience with any of the solutions selected above.

300 character(s) maximum

12. How can affordable housing investments be scaled up more effectively and funding and financial schemes improved?

300 character(s) maximum

EU and national funding should prioritize expanding affordable, energy-efficient housing, including social housing. The ongoing MFF discussion offers a timely opportunity to scale up investments. Funding schemes should also be stable and long-term to support the market.

13. How can financial incentives be best targeted and calibrated to help young people get access to housing?

300 character(s) maximum

Providing an interest free loan that can be backed by EU guarantees targeting young people. Ensure that the incentives are clear and use, for example, OSS to increase awareness.

14. How can the use of EU funds for affordable housing be improved in practice and be made more user-friendly?

300 character(s) maximum

Funding for affordable housing should also focus on boosting the energy efficiency of buildings to enhance overall affordability. Additionally, citizens often lack awareness of available EU funds one-stop-shops can simplify access and provide targeted support for affordable and sustainable housing

State aid

Current State aid rules allow public support for social housing without the Commission's prior authorisation. However, Member States wishing to support affordable housing schemes generally need to notify their plans to the Commission in advance and obtain its authorisation.

15. Have you experienced any difficulties related to State aid when financing social housing projects?

- ☐ Yes
- ☐ No

16. Have you experienced any difficulties related to State aid rules when financing affordable housing projects with public resources?

- ☐ Yes
- ☐ No

17. Have you experienced any difficulties related to State aid rules when financing renovation projects?

- ☐ Yes
- ☐ No

18. The Commission will revise the State aid rules to allow support for affordable housing without the Commission's prior authorisation. Some conditions may be attached to these new rules.

Which issues do you think that the Commission should bear in mind when designing State aid rules to establish affordable housing schemes?

Maximum 3 selection(s)

- ☐ The price of the affordable housing
- ☐ The income of the occupants (in relation to the costs for occupying/buying the housing)
- ☐ The ownership of the housing units (e.g. to ensure that the homes built remain under public ownership or dedicated to social / affordable housing)
- ☐ The accessibility of the housing units (e.g. for persons with disabilities)
- ☒ Environmental performance (energy performance class of the housing units, environmental standards, climate resiliency, use of land, material and water)
- ☐ The social diversity of the occupants of the building
- ☐ The providers of the affordable housing
- ☐ Other

The EU construction sector faces several major structural challenges: low productivity, labour shortages, high construction costs and a significant environmental footprint.

19. Which factors do you consider most important to reduce costs and scale up building activity?

Maximum 3 selection(s)

- ☒ Less red tape and reporting, faster planning and permitting
- ☒ Sustainable and energy efficient construction materials, circularity and waste reduction
- ☒ Innovative building techniques, e.g. prefabricated building renovation modules and off-site construction
- ☐ Full digitalisation of the value chain (construction products, permits, energy performance certificates, building logbooks, demolition audits)
- ☐ Improved access to finance, with longer maturity of loans and more guarantees
- ☐ Access to skilled workforce
- ☐ An efficient judiciary system to handle disputes, enforce contracts and ensure compliance with building codes and regulations
- ☐ Enhance the availability and reduce the cost of land designated for housing
- ☐ Public procurement (e.g. accelerated procedures, joint purchasing, digitalisation)
- ☐ Other

Please provide links or studies on good practices on any of the above

300 character(s) maximum

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20. In the context of its work on affordable housing, the Commission is developing a European Strategy on Housing Construction focusing on the supply side of the housing crisis.

What type of EU intervention do you consider necessary to help bring innovative building and renovation techniques and construction products to the market to increase housing affordability?

Maximum 3 selection(s)

- ☒ Reduce the administrative burden related to public procurement and enable a preference for European products
- ☐ Develop the necessary standards under the new Construction Products Regulation to make it easier to sell novel construction products across the EU Single Market
- ☐ Create a Single Market for recycled construction materials and waste
- ☐ Work with financial institutions and industry to de-risk investments in innovative construction products and methods
- ☐ Work with public authorities to generate demand for transforming empty dwellings or office buildings
- ☐ No EU intervention is necessary
- ☐ Other

Please provide links or studies on good practices on any of the above

300 character(s) maximum

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Zoning and permitting

Land use, spatial planning and permitting for building and renovation are primarily a local and regional competence. A number of authorities across the EU are taking initiatives to make these steps less complex and lengthy.

21. What are the main challenges to obtaining a permit during the zoning and spatial planning phase?

300 character(s) maximum

22. What is the average time to receive a building permit in your city/region /country?

100 character(s) maximum

23. When it comes to land use, spatial planning and permitting, what type of measures should public authorities prioritise to increase the supply of affordable housing?

Maximum 3 selection(s)

- ☐ Implement efficient land use policies, for example identifying areas suitable for housing projects not expected to have a significant environmental impact
- ☒ Focus on administrative capacity building (e.g. staff, more centralisation, digitalisation) of public authorities in charge of issuing permits
- ☐ Simplify building codes
- ☐ Simplify zoning and permitting requirements
- ☒ Allow fast track for renovation or repurposing project
- ☐ Allow higher density construction in residential or industrial areas
- ☒ Accelerate permitting procedures (e.g. with streamlined procedures for prefabricated housing, district-level renovations, or repurposing of buildings)
- ☐ Introduce single environmental assessments across an entire area for new developments
- ☐ Design policies that reconcile affordability with accessibility requirements for persons with disabilities and older persons
- ☐ Explore ways to streamline public appeals (e.g. eligibility criteria, time limits) without compromising citizens' rights to challenge decisions
- ☐ Other

24. How could the EU support Member States in simplifying and accelerating land use, spatial planning and permitting?

Maximum 3 selection(s)

- ☐ Support Member States in the implementation of EU legislation with an impact on land use and spatial planning
- ☐ Facilitate exchange of best practice among public authorities
- ☐

Provide recommendations and technical assistance on efficient land use and spatial planning policies for housing affordability

- ☐ Offer guidance on how to reconcile housing as an overriding public interest with other objectives such as 'No Net Land Take'
- ☐ Present new EU legislation to accelerate planning and permitting for housing projects
- ☐ Make EU funding for housing conditional upon fulfilment of relevant reforms in a Member State
- ☐ EU action is not necessary
- ☐ Other

Please provide links or studies on good practices on any of the above

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Repurposing, densification and vacant properties

There are many vacant industrial, commercial, residential, institutional, or historical buildings which could be repurposed or renovated to better meet affordable housing needs. Converting existing buildings reduces the need for new construction and related carbon emissions, land use and infrastructure costs, and negative impact on climate change resilience and biodiversity through new land take. It can also help revitalise neighbourhoods and generate demand for new services.

25. Do you see obstacles in repurposing and renovating vacant buildings?

Maximum 3 selection(s)

- ☐ High costs
- ☐ Complexity in changing the designation of an area from commercial or industrial use to residential use
- ☒ Length of time to receive a permit to repurpose/renovate vacant building
- ☐ Difficulty to adapt post-industrial/commercial and institutional buildings for residential purposes
- ☐ Need to comply with legal requirements / building standards

- ☒ Ownership related issues and other legal complexities
- ☐ Location in low demand area or are with lack of services
- ☐ No obstacles
- ☐ Other

26. How should public authorities best support the repurposing of vacant buildings?

Maximum 3 selection(s)

- ☒ Ensure a comprehensive inventory of buildings, their state and their occupancy
- ☒ Adjust zoning policies, reform building standards and streamline the permitting process for reconversions or repurposing of buildings, reducing bureaucratic hurdles and delays
- ☒ Offer funding, subsidies or tax incentives to facilitate renovation and repurposing of unused buildings
- ☐ Impose additional taxation on unused buildings
- ☐ Mandatory evaluation of building reversibility before demolition, including its integration
- ☐ Invest in research on new renovation techniques which offer cost and time savings and reduce waste
- ☐ Promote mixed use of buildings (supermarket combined with housing etc.)
- ☐ Raise public awareness about the benefits of reconversion and engage with local communities
- ☐ Other

27. How could the EU support Member States' efforts to repurpose vacant buildings?

Maximum 3 selection(s)

- ☒ Facilitate the use of the EU Building Stock Observatory to provide data and information on the EU's building stock, including energy consumption and renovation rates, and develop criteria on what constitutes vacancy
- ☒ Ensure that EU legislation on renovation of buildings facilitates the repurposing of buildings
- ☐ Facilitate exchange of best practice
- ☐

Provide recommendations and technical assistance on repurposing and renovation of unused buildings

- ☒ Devote specific funding streams (e.g. New European Bauhaus, Affordable Housing Initiative) to repurposing and densification
- ☐ EU action is not necessary
- ☐ Other

28. How should illegal occupation and squatting be best addressed by the responsible public authorities?

300 character(s) maximum

Please provide links or studies on good practices on any of the above

300 character(s) maximum

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Simplification

The Commission has identified speed, coherence and simplification as key political priorities, and is focusing on reducing administrative burdens and simplifying implementation: less red tape and reporting, more trust, better enforcement, faster permitting.

29. Have you identified any overlapping, unnecessary or disproportionate EU rules that create barriers to the supply of affordable housing?

- ☐ Yes
- ☒ No

30. Have you identified any national, regional or local rules that create unnecessary barriers to the supply of affordable housing? If yes, which ones?

- ☐ Yes
- ☐ No

Construction trades (e.g. plumbers, electricians, bricklayers) are among the occupations which face the most widespread shortages in Europe. Delivering affordable housing also means addressing labour shortages and developing the skills for new building techniques – from construction workers to architects and engineers, from real estate developers to urban planners and local administrations.

31. What measures do you think that public authorities in the Member States should prioritise to address labour shortages in construction trades?

Maximum 3 selection(s)

- ☒ Increase the attractiveness, quality and number of offers in Vocational Education and Training programmes to help individuals gain the skills necessary for the construction job market
- ☐ Improve working conditions in the construction sector to make it more attractive, including for young people and women
- ☒ Stimulate upskilling and reskilling along the construction value chain to match the knowledge gap (e.g. in digital technologies, advanced manufacturing, off-site construction, hybrid techniques combining timber and concrete, integration of technologies such as heat pumps and renewables)
- ☒ Invest in capacity and skills in public administrations and urban planners through targeted training and exchange programmes
- ☐ Other

32. Can you share good practices on solutions that address labour shortages in construction trades?

Please provide evidence if available.

300 character(s) maximum

33. Do you think that the EU should take additional measures to address labour shortages in construction trades?

Maximum 3 selection(s)

- ☐ Improve the recognition of professional qualifications and skills
- ☐ Better enforce existing legislation on labour law and free movement in the EU
- ☐

Address the potential of legal migration from non-EU countries to help host EU countries address labour market needs through easier recognition of professional qualifications

- ☐ Tackle specific authorisation or certification requirements that prevent qualified services providers (e.g. construction workers, electrical, gas or solar panel installation services) from providing services in another EU country
- ☐ Promote and support the social dialogue between employers and employees in construction to contribute to improving working conditions in the sector
- ☒ Other

*Please specify

100 character(s) maximum

The prompt implementation of EPBD and EED is key to accelerate investments for skills development

Rental market, short-term accommodation rentals and tourism, secondary homes

Short-term rentals via online platforms have experienced fast growth and now represent around one quarter of the total EU supply of tourist accommodation.

34. Do you see an impact of short-term rentals in your country, region or city?

If yes, please describe the impact and the context (e.g. capital city, rural area, touristic region). Please provide quantified evidence if available.

300 character(s) maximum

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A new EU Regulation applicable from May 2026 ('Short Term Accommodation Rentals Regulation') will increase transparency requirements for hosts, giving more information on the location and duration of short-term rentals, allowing public authorities to take proportionate measures when necessary. And new EU tax rules will also require digital platforms to report income earned by hosts and to charge and collect VAT on behalf of the hosts. Meanwhile, a number of public authorities in the Member States are restricting short-term rentals.

35. In your view, what else should be done at EU level to address the issue of short-term accommodation rentals?

Maximum 3 selection(s)

- ☐ There is no need for additional EU policy intervention – the priority now should be to implement the new Short Term Accommodation Rentals Regulation, making sure that it generates relevant data and clamping down on illegal listings
- ☐ The EU and Member States should gather additional economic evidence on the impact of short-term rentals on housing affordability
- ☐ The EU should facilitate the exchange of best practice based on an assessment of the legal and economic impact of various policies, including taxation
- ☐ The EU should support measures to diversify tourism flows so that the benefits of tourism are spread more sustainably and the disadvantages of overtourism in certain hotspots are reduced
- ☐ Strengthen EU-level regulation of short-term accommodation
- ☐ The EU should take enforcement action against unjustified and disproportionate restrictions on short-term accommodation rentals
- ☐ There is no need for any further policy intervention
- ☐ Other

36. Do you have good practice examples and ideas of policies that balance short-term rentals better with needs for long-term housing?

Please specify and provide evidence if available.

300 character(s) maximum

37. A secondary home is a property where people spend time away from their primary home. Secondary homes may be rented out for certain periods (short-term rentals) or may be primarily used by the owners. There are concerns that secondary homes can make housing less affordable for local residents, and/or can contribute to vacant housing stock.

Do you see an impact of secondary homes in your country or region?

If yes, please describe the impact and the context (e.g. capital city, rural area, touristic region).



Yes

☐ No

38. What policy intervention do you consider most effective in encouraging more efficient use of properties owned as secondary homes that are underused?

Maximum 3 selection(s)

- ☐ Introduce an additional property taxation for secondary homes (e.g. for homes occupied for less than xx days a year)
- ☐ Provide incentives to renting secondary homes for certain periods of the year
- ☐ Limit the number of secondary homes in certain areas
- ☐ Ensure equal treatment for second homeowners (including across borders, e.g. buyers of secondary home in a country different from a country of first residence vs buyers of secondary home in the same country as the first residence)
- ☐ Other

39. What additional aspects should be considered to ensure the proper functioning of the rental market?

Maximum 3 selection(s)

- ☐ Increase property taxation
- ☐ Reduce taxation of rental incomes
- ☐ Promote transparent and enforceable rental agreements, notably through standardised documentation and appropriate registration mechanisms
- ☐ Design fiscal or regulatory incentives that favour long-term rental contracts over short-term or tourist rentals, helping stabilise supply for residents
- ☐ Enhance protection of tenants through measures such as open-ended rental contracts, and publicly available register including rental prices
- ☐ Support rent guarantee schemes
- ☐ Introduce rent caps
- ☐ Other

Financialisation* and speculation

** Financialisation: Treating housing as a financial asset for investment and profit, rather than primarily as a place to live.*

40. Do you think that buying homes primarily for resale at a higher price contributes to rising housing costs?

- ☐ Yes
- ☐ No

41. Should commercial ownership of housing in a defined geographical area be limited or discouraged?

- ☐ Very much agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ No opinion

43. What would be the impact of measures to limit the ownership of housing units by financial firms, for instance on rental supply and rental prices or on the returns for small investors in investment portfolios?

Please provide evidence, if available.

300 character(s) maximum

44. Do you think vacant properties should be taxed or regulated to encourage owners to put them on the market?

- ☐ Yes
- ☐ No

Inclusiveness

45. Should any target group(s) be prioritised by the European affordable housing plan?

If yes, please explain which one(s) and why.

300 character(s) maximum

People facing energy poverty should be a priority. Tackling this issue means renovating the least efficient buildings to lower energy bills for vulnerable households. Multiple forms of assistance are needed, particularly to cover upfront renovation costs

46. How can young people be most effectively supported both as renters and as first-time owners?

300 character(s) maximum

47. What actions could be taken to improve the accessibility of housing for persons with disabilities and older persons?

Maximum 2 selection(s)

- ☐ Earmark funding for accessibility
- ☐ Improve the skills of construction professionals on accessibility
- ☐ Improve legal certainty on the requirements for accessible housing
- ☐ Other

48. What could be done to ensure equal access to quality housing and independent living for groups at risk of discrimination (based on racial or ethnic origin, religion or belief, sexual orientation, gender identity, sex characteristics etc.)?

Maximum 3 selection(s)

- ☐ Strengthen national anti-discrimination laws in housing and ensuring effective enforcement of existing legislation
- ☐ Provide legal aid and support services to individuals affected by housing discrimination
- ☐ Tackle housing segregation by supporting the development of inclusive housing projects for groups at risk of discrimination
- ☐ Reserve a proportion of public or social housing for groups at risk of discrimination
- ☐ Support access to credit and housing loans for groups at risk of discrimination
- ☐ Fund transitional housing and shelters for those in precarious situations
- ☐ Run public awareness campaigns on housing rights and anti-discrimination
- ☐ Foster the exchange of best practices among Member States on inclusive practices

- ☐ Encourage cooperation between public authorities, civil society, and community groups
- ☐ Other

49. How could housing policies and investments contribute to the fight against homelessness, both in terms of prevention and of ensuring sustainable housing solutions for homeless people?

Maximum 3 selection(s)

- ☐ Rental market regulation to ensure greater fairness and inclusiveness, in particular with respect to evictions
- ☐ Provide more efficient and timely support services (debt counselling, mediation services, financial support and other) to people at risk of eviction
- ☐ Ensure housing assistance for the most vulnerable in the form of adequate housing benefits/allowances
- ☐ Ensure social and public housing is adequate and the allocation system prioritises homeless people
- ☐ Create a favourable environment to attract social impact investments by the private sector in the area on housing, which could benefit homeless people
- ☐ Other

Governance

50. Housing is impacted by a very wide range of policies which can be set at local, regional, national or even EU level.

What would be the best way to work together across all these levels to improve the affordability of housing and disseminate good practices?

300 character(s) maximum

A dedicated platform connecting private and public stakeholders at local, regional, and national levels should be established to share good practices and provide insights on progress and challenges related to affordable housing.

Closing questions

51. Do you wish to remain available for further questions via the email address you provided?

- ☒ Yes
- ☐ No

52. Do you wish to upload a file to provide additional information or a more comprehensive explanation (e.g. position papers)?

Only files of the type pdf,doc,docx,odt,txt,rtf are allowed

a16e0119-7668-4625-bbac-772bef6d086e/251015_-_EU-ASE_Affordable_Housing_Addendum.pdf

Contact

ENER-TF-HOUSING@ec.europa.eu

Addendum to Consultation Response

This addendum complements our answers to Questions 3, 4 and 9 and 29 of the consultation. It adds further inputs as we were unable to provide contributions longer than 100 characters. We hope these contributions can be taken into consideration.

3. Do you consider that a common definition of affordable housing is needed in the EU?

In our view convergence, tending toward an EU definition of affordable housing, is needed. The definition should integrate a clear link to energy-efficient housing covering both the concepts of renovations and retrofits encompassing a broad range of interventions ranging from the building envelope to system optimization and automation, flexibility, and smart interventions also aimed, when public support is involved, to audit and monitor performance.

4. What would be the most important solution to significantly increase the supply of affordable housing over the short- and medium-term perspective?

In our view, repurposing should systematically require renovations and retrofits so to significantly improve performance and lower costs through reduction of energy demand, optimization of energy consumption and increased flexibility.

9. How can the different challenges facing urban and rural housing needs be addressed to improve access to affordable, sustainable and decent housing for all Europeans, including through spatial planning and financial support?

Urban area offers opportunities to improve access to affordable, sustainable and decent housing as 75% of the existing buildings is inefficient and 80 to 95% of today's building will still be standing in 2050 thus EPBD implementation will be crucial to improve the energy performance of houses and lowering their energy bills.

29. Have you identified any overlapping, unnecessary or disproportionate EU rules that create barriers to the supply of affordable housing?

The EU framework (EPBD and Article 6 EED) provide clarity and stability for mobilizing investments for affordable housing. The framework promotes energy performance improvement and therefore a more affordable built environment. The AH Plan should focus on ensuring its effective implementation across MSs.