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Date: 17/10/2025 11:42:42

Open Public Consultation on the European Affordable Housing Plan

| Fields marked with ' | * are mandatory. |
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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

Company/business

Bulgarian

Croatian

Czech

| 0 | Danish |
|-------|-------------------------------|
| 0 | Dutch |
| 0 | English |
| 0 | Estonian |
| • | Finnish |
| 0 | French |
| 0 | German |
| 0 | Greek |
| 0 | Hungarian |
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| 0 | Lithuanian |
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| 0 | Polish |
| 0 | Portuguese |
| 0 | Romanian |
| 0 | Slovak |
| 0 | Slovenian |
| 0 | Spanish |
| 0 | Swedish |
| *I am | giving my contribution as |
| 0 | Academic/research institution |
| 0 | Business association |

| EU citizen |
|--|
| Environmental organisation |
| Non-EU citizen |
| Non-governmental organisation (NGO) |
| Public authority |
| Trade union |
| Other |
| *First name |
| Marju |
| *Surname |
| Silander |
| *Email (this won't be published) |
| marju.silander@omakotiliitto.fi |
| *Organisation name |
| 255 character(s) maximum |
| Suomen Omakotiliitto ry (The Finnish Home Owners' Association) |
| *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. |

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*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.

| 0 | Afghanistan | 0 | Djibouti | 0 | Libya | 0 | Saint Martin |
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| | Åland Islands | 0 | Dominica | | Liechtenstein | | Saint Pierre and |
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| | Algeria | 0 | Ecuador | | Luxembourg | | Samoa |
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| | Andorra | 0 | El Salvador | | Madagascar | | São Tomé and |
| | | | | | | | Príncipe |
| | Angola | 0 | Equatorial Guinea | | Malawi | | Saudi Arabia |
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| 0 | Antarctica | 0 | Estonia | | Maldives | | Serbia |
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| 0 | Cameroon | | Iceland | 0 | North Macedonia | 0 | Tunisia |
| | Canada | | India | | Norway | 0 | Türkiye |
| 0 | Cape Verde | 0 | Indonesia | 0 | Oman | 0 | Turkmenistan |
| 0 | Cayman Islands | 0 | Iran | 0 | Pakistan | 0 | Turks and |
| | | | | | | | Caicos Islands |

| | Central African | | Iraq | | Palau | | Tuvalu |
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| | Chad | | Ireland | | Palestine | 0 | Uganda |
| | Chile | | Isle of Man | | Panama | 0 | Ukraine |
| | China | | Israel | | Papua New | 0 | United Arab |
| | | | | | Guinea | | Emirates |
| | Christmas Island | | Italy | 0 | Paraguay | | United Kingdom |
| | Clipperton | | Jamaica | 0 | Peru | | United States |
| | Cocos (Keeling) | | Japan | 0 | Philippines | 0 | United States |
| | Islands | | | | | | Minor Outlying |
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| | Colombia | | Jersey | 0 | Pitcairn Islands | 0 | Uruguay |
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| | Congo | | Kazakhstan | 0 | Portugal | 0 | Uzbekistan |
| | Cook Islands | | Kenya | 0 | Puerto Rico | | Vanuatu |
| | Costa Rica | | Kiribati | 0 | Qatar | 0 | Vatican City |
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| | Croatia | | Kuwait | 0 | Romania | 0 | Vietnam |
| | Cuba | | Kyrgyzstan | | Russia | 0 | Wallis and |
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| | Curaçao | | Laos | | Rwanda | | Western Sahara |
| | Cyprus | | Latvia | | Saint Barthélemy | | Yemen |
| | Czechia | | Lebanon | 0 | Saint Helena | 0 | Zambia |
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| | Republic of the | | | | Nevis | | |
| | Congo | | | | | | |
| | 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

 Owner organisation
 materials or appliances

| Energy efficiency | | 0 | Education and training |
|--------------------------|----------------------------|--------|---------------------------------|
| Commercial housing | | 0 | Academia and research |
| | | | institution |
| Social housing | | 0 | Healthcare |
| Spatial planning | | 0 | Tourism |
| Architecture | | 0 | Short-term rental platform |
| Working with homele | ss people | 0 | Other |
| 2. In which countries do | you primarily operate | ? | |
| All EU Member State | s Denmark Italy | | Romania |
| Outside the EU | Estonia Latvia | | Slovak Republic |
| Austria | Finland Lithuan | ia | Slovenia |
| Belgium | France Luxemb | οοι | urg Spain |
| Bulgaria | Germany Malta | | Sweden |
| Croatia | Greece Netherla | an | ds |
| Cyprus | Hungary Poland | | |
| Czechia | ☐ Ireland ☐ Portuga | al | |
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| Affordable and social ho | using | | |
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| common definition in | | :06 | essary or possible to have a |
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| which would involve E | | uS | ing is necessary in all areas |
| Other | -o randing. | | |
| O 11 101 | | | |

*Please specify

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 |
| $^{\square}$ Limit short-term accommodation rentals in areas where this limits supply of |
| affordable housing for local people |
| Limit financial speculation in the housing market |
| |

*Please specify

Other

100 character(s) maximum

Monipuolinen asuntorakentaminen, erityisesti pientaloja, joissa Suomessa yli 70% ihmisistä haluaa asua.

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?

Suomessa pientalojen rakentaminen on ilmasto- ja maantieteellisistä olosuhteista johtuen energiantehokkasta, mm. omakotitaloissa on 3-lasiset ikkunat. Koska asuntojen lämmitystarve Suomessa on syyskuusta huhtikuuhun, myös eristäminen tehdään huolellisesti.

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

*Please specify

100 character(s) maximum

Monipuolinen asuntotuotanto, mahdollisuus vuokra- ja omistusasumiseen.

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

Suomessa esimerkiksi useita järjestötoimijoita. Esim. opiskelija-asunnot, ikäihmisten asunnot, asuntoja ihmisille joilla on jokin vamma, asuntoja pientuloisille. Ollut myös pientaloja koskeva aravajärjestelmä aiemmin, kohtuuhintaisten- ja kokoisten omakotitalojen rakentamiseen ja remontointiin.

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.

Yhteisöllisen asumisen ja yhteisrakentamisen muotojen kehittäminen on tärkeä vaihtoehto. Osuuskunnista esimerkiksi energiayhteisöt voivat olla jatkossa kiinnostavia omakotitaloasukkaille. Suomessa on myös olemassa asumisoikeusasunto-toimintamalli.

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

Suomessa alueellinen kehitys haastaa kaupunki- ja haja-asutusalueen asukkaita eri tavoin. Asuntojen hinnat ovat laskeneet Suomessa, eli asuntokriisi on päinvastainen kuin monissa EU-maissa, joissa hintojen nousu ongelma. Sääntelyn vähentäminen keskeistä, jotta arjen asumiskulut saadaan laskuun.

Financing

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

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

Verotus: Asuntolainan korkovähennysoikeus ja ensi-asunnon ostajan varainsiirtoverovapautus poistettu.

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 |
| V | Risk-sharing mechanisms such as guarantees |
| | Combination of financial instruments with grants (blended finance) |
| | Equity investments |
| | Public-private partnership models |
| V | 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. |
| 1 | Other |

*Please specify

100 character(s) maximum

Verohyötyjen palautus (asuntolainan korkovähennys, varainsiirtoveron poisto). Uudet korkotukimallit.

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

300 character(s) maximum

Esimerkki ensiasunnon ostajien tukimekanismista https://www.valtiokonttori.fi/palvelut/rahoitus-ja-lainapalvelut/asp-saastaminen-ja-asp-laina/

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

300 character(s) maximum

Mahdollisuus hankkia kohtuuhintainen omakotitalo(esim.omaa työtä hyödyntäen, edullinen valmistalopaketti, edullisemmat tontit). Sääntelyn purku,esim. EPBD keventäminen, jotta rakentamiskustannukset matalammat. Lainatakausmalleja nuoret ja lapsiperheet voivat hankkia omakotitalon.

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

Kannustus säästää omaosuutta. Vahvistetaan asumis- ja taloustaitoja. Neuvotaan kustannus- ja energiatehokkaan uuden tai remontoitavan omakotitalon hankintaan. Tarjolla takaustukia asuntolainaan. Alennetaan asumiskuluja, kuten asuntojen kiinteistöverotusta. Veroetu ensiasunnon ostajalle.

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

Tiedotetaan selkeästi mitä on tarjolla, kuka voi hakea, miten haetaan, millä periaatteilla voi saada EU-varoja. EU:n panostettava aktiivisesti maakohtaiseen markkinointiin tukimuodoista kaikkiin jäsenvaltioihin.

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 |
| $\ \ \square$ 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 |
| |
| |

Construction

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, digitalisationOther |
|---|
| Please provide links or studies on good practices on any of the above |
| 300 character(s) maximum |
| Tietoa rakennus- ja asumiskustannuksista esimerkiksi Pellervon taloustutkimuksen selvityksiä löytyy sivuilta https://www.ptt.fi/teemat/asuminen/ Arjen asumiskustannusten alentaminen tukee kuluttajien aktivoitumista rakennushankkeisiin. |
| You can upload your file(s) here |
| Only files of the type pdf,txt,doc,docx,odt,rtf are allowed |
| 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

Jäsenvaltioille saatavilla EU-rahoitusta innovatiivisten rekennus- ja peruskorjaustekniikoiden edistämiseksi sekä tarvittavien rakennustuotteiden hankkimiseen kohtuuhintaisuuden lisäämiseksi. Edistetään yhteishankintoja.

You can upload your file(s) here

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

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

Useimmiten haasteena pientaloasukkaille on, että keskeneräinen kaavoitus estää rakentamisen tuona aikana tai vaatii poikkeuslupakäsitelyn, joka on aina pidempi prosessi.

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

100 character(s) maximum

Vaihtelee kuntien välillä, arviolta 1-12 kk. Uusi laki voimaan 1/2026, jolloin tulee 3 kk aikaraja.

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

| orefabricated housing, district-level renovations, or repurposing of buildings) Introduce single environmental assessments across an entire area for new Idevelopments Design policies that reconcile affordability with accessibility requirements for |
|---|
| levelopments |
| · |
| esign policies that reconcile affordability with accessibility requirements for |
| resign pension that reconding and dability with according requirements for |
| persons with disabilities and older persons |
| Explore ways to streamline public appeals (e.g. eligibility criteria, time limits) |
| vithout compromising citizens' rights to challenge decisions |
| Other |
| ow could the EU support Member States in simplifying and accelerating |
| se, spatial planning and permitting? |
| um 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 |
| patial 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 |
| especify |
| aracter(s) maximum |
| tasolla vähennetään asumista koskevaa ja liian yksityiskohtaista nykysääntelyä. |
| |

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

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 |
| |
| |

*Please specify

100 character(s) maximum

Miten muuttaa vapaa-ajanasunto vakituiseen asuinkäyttöön. Tyhjiin omakotitaloihin ei löydy asukkaita

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

| V | 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.) |
| V | Raise public awareness about the benefits of reconversion and engage with |
| | local communities |
| V | Other |

*Please specify

100 character(s) maximum

Kaavamuutokset, että 1-asuntoisia omakotitaloja voi muuttaa esimerkiksi 2-asuntoiseksi.

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

Maximum 3 selection(s)

| waximum 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 |
|-------|
| Other |

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

300 character(s) maximum

Kansallisessa lainsäädännössä on oltava vahva omaisuudensuoja.

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

300 character(s) maximum

https://www.finlex.fi/fi/lainsaadanto/1999/731

You can upload your file(s) here

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

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
- O No

*Please specify and provide evidence (link or file), if available

300 character(s) maximum

Pientaloasukkaille ei saa tulla EU-sääntelystä johtuvia lisäkustannuksia asumiseen ja oman kodin rakentamiseen.

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

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

| 0 | Yes |
|---|-----|
| 0 | No |

*Please specify and provide evidence (link or file), if available

300 character(s) maximum

Kaupungeissa ja kasvukeskuksissa kohtuuhintainen tonttitarjonta haasteena.

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Labour shortages, skills and working conditions

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

*Please specify

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

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.

Ongelma ei ole koko Suomen tasolla vakava, mutta matkailualueella Lapissa esimerkiksi Rovaniemellä tunnistettu.

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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.

Omakotitaloalueilla huolehditaan rauhallisuudesta ja turvallisuudesta. Nämä ovat pientaloasukkaiden keskeisiä arvoja ja syitä valita asumismuoto. Huolehditaan omaisuudensuojasta ja luodaan tehokas ratkaisumekanismi häiriötilanteiden varalle. Asuntokaavoituksella suojellaan käyttötarkoitusta.

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

*Please specify

100 character(s) maximum

Omakotitalojen ja mökkien omistajille esimerkiksi vuokratulojen veroalennus.

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 |

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

Yes

O No

*Please specify and provide evidence (link or file), if available

300 character(s) maximum

Jos asuntojen hinnat nousevat tämän vuoksi se nostaa asuntoa ostavan arjen pakollisia asumiskuluja. Esimerkiksi kun asunnon hinta on korkeampi->asukkaalla korkeammat korkokulut ja kiinteistövero. Asuntoa ostaessa korkeampi kertaluonteinen varainsiirtoveromaksu.

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

Very much agree

Agree

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

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 Ei kommenttia, yleensä omakotitaloasukas on itse kotinsa omistaja. 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.

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

opiskelijat, asunnottomat, syrjäytyneet tai syrjäytymisuhan alla olevat ihmiset.

300 character(s) maximum

300 character(s) maximum

Neither agree nor disagree

Disagree

Strongly disagree

Vahvistetaan nuorten asumis- ja taloustaitoja. Nuorille tietoa rahoitus- ja asumismuodoista ja kodin huollosta. Myös omakotitalo voi olla ensiasunto. Verokannustimia asunnon ostoon ja lainanhoitoon. Luodaan luottamus yhteiskuntaan, on työpaikkoja, luontoa ja mahdollisuuksia hyvään elämään.

Haavoittuvassa asemassa olevat kansalaiset, esimerkiksi ikäihmiset, ihmiset joilla jokin pysyvä vamma, nuoret,

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 |
| *Please specify |
| 100 character(s) maximum |
| Huolehditaan, että kaikessa asuntotuotannossa on lähtökohtaisesti aina osa esteettömiä asuntoja. |
| 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

*Please specify

100 character(s) maximum

Suomessa on olemassa asunnottomuuden torjuntaan Asunto ensin -periaate. Asunto on ihmisoikeus.

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

Asuminen kuuluu ehdottomasti jäsenvaltioiden omaan toimivaltaan. On noudatettava toissijaisuusperiaatetta eikä EU:n tule laajentaa toimivaltaansa asumisen asioissa. Jäsenvaltiot voivat tehdä vapaaehtoista yhteistyötä kaikilla tasoilla.

Closing questions

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

YesNo

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

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/EU_AffordableHousingPlan_SuomenOmakotiliitto_17102025_lausuntoliite.pdf

Contact

ENER-TF-HOUSING@ec.europa.eu