

**President Ursula von der Leyen**  
European Commission  
Rue de la Loi 200  
1049 Brussels

**Build Europe**  
Rue de la Violette 43  
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*Brussels, 11 April 2022*

Dear President von der Leyen,

Build Europe is the umbrella organisation for the national federations of European developers and homebuilders, representing more than 60% of EU's homebuilding capacity and 14 states.

One of the main missions of Build Europe is to ensure that European citizens have access to decent and affordable housing, especially in the most critical times. We believe that the current Ukrainian refugee crisis requires immediate action from everyone. Developers and homebuilders in Europe are determined to be at the forefront of helping those in need.

In response to the impressive data on the number of Ukrainian refugees that we received from our members in Poland and Romania, Build Europe, together with all the European housing federations, worked to devise solutions to help Ukrainian refugees. Together, we developed a set of collective actions and policy proposals for the short, medium, and long term.

At the request of our Polish colleagues, Build Europe purchased beds that have been delivered to Poland, but Build Europe also supported the federations in Romania and Moldova by providing local humanitarian organisations with substantial financial aid.

These initiatives are based on the current emergency and the current needs of the refugees, but they are not adequate to respond to longer term issues. We believe that the solution to this unprecedented humanitarian crisis must be complemented and supported by strong and sustainable institutional actions at EU level. The European Commission must consider that, on the one hand, refugees urgently need a roof over their head in such a critical moment but, on the other hand, even when this war ends, many Ukrainian refugees will not be able to return immediately to their homes, which have been destroyed, and that many of them will decide to remain in the European Union.

Therefore, we would like to work together with the European Commission in order to:

### **1. Promptly respond to the emergency (short-term action)**

In such a difficult time, we are witnessing the astonishing solidarity of European people who are welcoming the Ukrainian refugees with all the means at their disposal. The Czech, Hungarian, Moldovan, Polish, and Romanian housing federations report that they have made available empty offices and to provide shelter for refugees. Nevertheless, living conditions with a minimum of level comfort must be offered to all. For this reason, on 11 April, Build Europe and its partners delivered more than 500 beds to Poland, and made a donation, through the Romanian and Moldovan housing federations, to humanitarian associations that provide refugees at the border with a transport network.

Build Europe and its members are at the disposal of the European Commission to provide more information concerning the current conditions and practical needs in terms of emergency accommodation in the EU.

### **2. Offer provisional housing solutions (medium-term action)**

We know that it is difficult to build new housing for the refugees in the very short term. Therefore, we need to work on temporary housing solutions that offer people decent living conditions in different forms (i.e. chalets, tiny houses, or mobile constructions).

We are available to discuss with the European Commission and the EU national governments about the most suitable housing solutions, but the European Commission should already point out to national governments that it is crucial to swiftly adopt and implement specific urban planning measures that allow the development of provisional housing solutions.

We consider that the European Commission should also help Member States to exchange information concerning the initiatives that each European country has adopted and implemented to respond to this emergency. The circulation of a catalogue of "Best Practices" could be particularly useful.

For example, in Norway, on 7 March, the government introduced a temporary regulation that provided developers with a maximum 5-days application process for the construction of provisional housing for asylum seekers and gave exemptions from most of the technical requirements and regulations not directly linked to safety. On 31 March, this temporary regulation was replaced by a new one called [Temporary regulations on exemptions from the Planning and Building Act to deal with high arrivals of displaced Ukrainians](#). Norway is

currently working on a new temporary regulation, both for provisional and permanent housing, which extends the 5-days application process also to the construction of permanent accommodations. The objective of Norwegian developers is now to develop standardised building types (two storey, low-rise multifamily buildings) that can be built quickly.

### **3. Urgently launch the development of a sustainable housing supply (long-term action)**

What is provisional must not become permanent. The provision of temporary housing for the refugees may help in the short term, but it does not solve an existing problem that this crisis has made even more evident: the lack of housing supply, which led to a vertiginous rise in property prices throughout Europe.

Provisional solutions must be temporary, and must not become permanent or replace long-term solutions, as may have happened in the past. When it comes to the housing sector, such attitude would lead to the creation of ghettos for the Ukrainian refugees who will decide to remain in the EU. Therefore, we must think ahead and start working immediately to develop long-term and sustainable housing solutions to respond to the increasing housing demand across the EU, which this refugee crisis has heightened.

In 2019, we published a [Manifesto](#) on the housing crisis with the ambition to provide the European institutions with a set of practical and feasible solutions to ensure the creation affordable quality housing. In 2020, we published a [new set of propositions](#) aimed at relaunching the European economy and the construction sector, while preventing a worsening of the housing crisis following the Covid-19 crisis. As then, the solution is still the same: we need to build more and quicker, ensuring a diversified offer that favours integration.

The European Commission should foresee a series of actions to deal with the Ukrainian refugee crisis and call on European national governments to:

- a) accelerate the delivery of building permits;
- b) simplify (at least temporarily) the construction procedures;
- c) urgently make public land available to operators; and
- d) ensure that in the whole European Union affordable housing can be provided by both public and private operators, without discrimination.

Build Europe members are ready to take up the challenge, as – following the Covid19 crisis and the refugee crisis – housing emerges as a fundamental point of balance for European

citizens and families, who have the right to live, study, and work in a home that meets their needs in terms of space and comfort.

We remain at your disposal to discuss how Build Europe can assist the European Commission in developing the housing supply necessary to manage the influx of Ukrainian refugees.

We would like to thank you for having taken the time to read our comments and suggestions and we look forward to hearing back from you.

Yours sincerely,



**Marc Pigeon**  
**President, Build Europe**



**Filip Loosveldt**  
**Managing Director,**  
**Build Europe**