COMMUNITY LAND TRUSTS
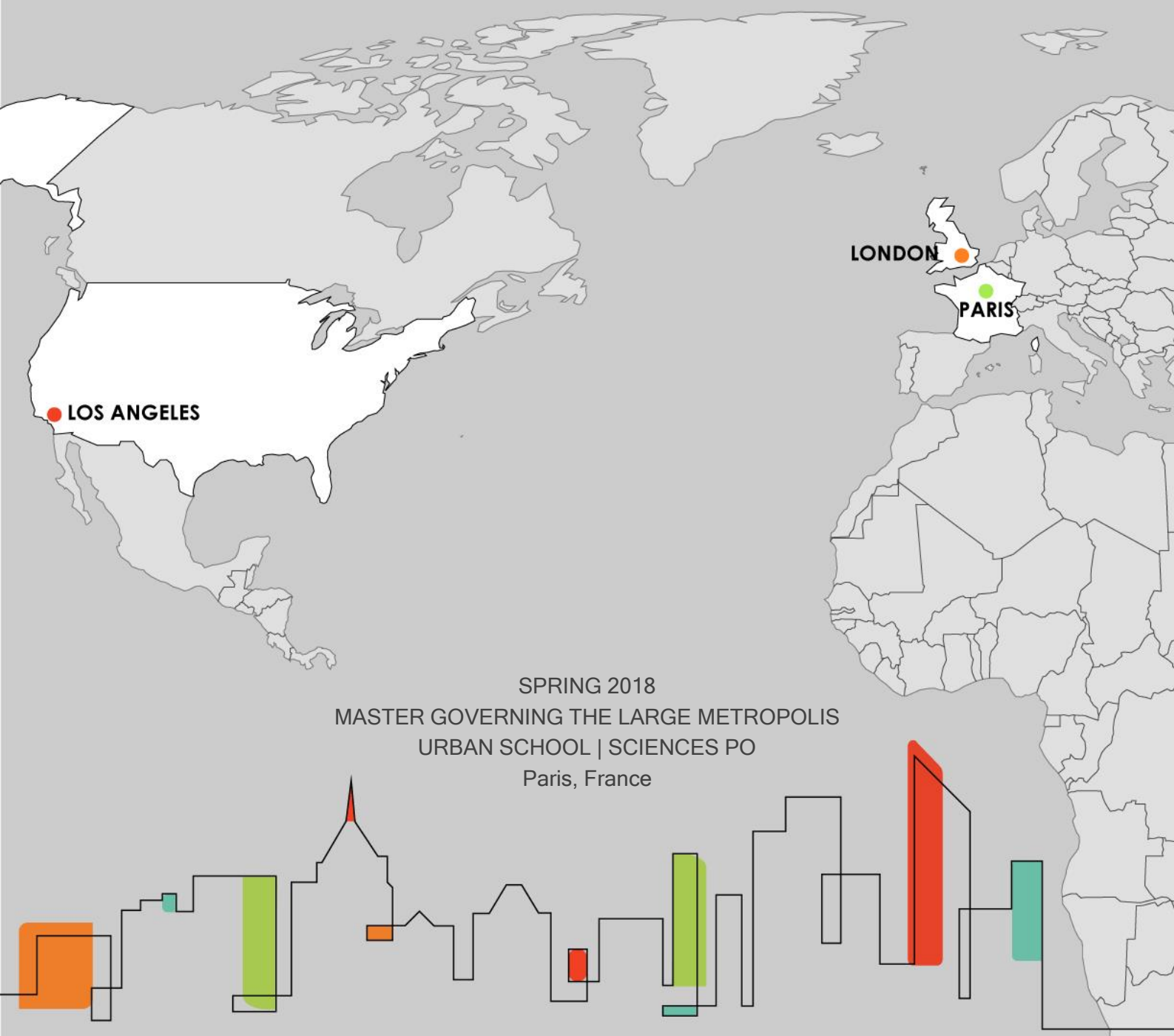## Bringing the Context Back in

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"Le premier qui, ayant enclos un terrain, s'avisa de dire : 'Ceci est à moi', et trouva des gens assez simples pour le croire, fut le vrai fondateur de la société civile. Que de crimes, que de guerres, de meurtres, que de misères et d'horreurs n'eût point épargnés au genre humain celui qui, arrachant les pieux ou comblant le fossé, eût crié à ses semblables : Gardez-vous d'écouter cet imposteur ; vous êtes perdus, si vous oubliez que les fruits sont à tous, et que la terre n'est à personne."

"The first man who, having enclosed a piece of ground, bethought himself of saying "This is mine," and found people simple enough to believe him, was the real founder of civil society. From how many crimes, wars, and murders, from how many horrors and misfortunes might not any one have saved mankind, by pulling up the stakes, or filling up the ditch, and crying to his fellows: Beware of listening to this impostor; you are undone if you once forget that the fruits of the earth belong to us all, and the earth itself to nobody."

Jean-Jacques Rousseau,
Discours sur l'origine et les fondements de l'inégalité parmi les hommes (1754)

"J'ai longtemps cru que le problème foncier était de nature juridique, technique, économique et qu'une bonne dose d'ingéniosité suffirait à le résoudre.
J'ai lentement découvert qu'il était le problème politique le plus significatif qui soit, parce que nos définitions et nos pratiques foncières fondent tout à la fois notre civilisation et notre système de pouvoir, façonnent nos comportements."

*" For a long time I believed that the land issue was legal, technical and economic in nature and that a good amount of inventiveness would be enough to solve it.
I slowly discovered that it was the most significant political problem of all, because our definitions and land practices are the foundation of both our civilization and our power system, shaping our behavior."*

Edgard Pisani
Utopie Foncière (1997)

ACKNOWLEDGMENTS

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ALUR	Loi pour l'Accès au Logement et un Urbanisme Rénové (FR)
AMI	Area Median Income (US)
ANIL	Agence Nationale pour l'Information sur le Logement (FR)
ANRU	Agence Nationale pour la Rénovation Urbaine (FR)
BRILO	Bail Réel Immobilier relative au Logement
BRS	Bail Réel Solidaire (FR)
BVCLT	Beverly-Vermont CLT (US)
CDC	Community Development Corporation (US)
CDC	Caisse des Dépôts et des Consignations (FR)
CDT	Contrat de Développement Territorial (FR)
CFF	Coopérative Foncière Francilienne (FR)
CLH	Community Led Housing (US-UK)
CLT	Community Land Trust (US-UK)
CRA/LA	Community Redevelopment Agency Los Angeles (US)
CRSP	Cooperative Resources & Services Project (US)
DALO	Droit au Logement Opposable (FR)
DIY	Do It Yourself
DHUP	Direction de l'Habitat, de l'Urbanisme et des Paysages (FR)
DTLA	Downtown L.A. (US)
ELACC	East L.A. Community Corporation (US)
EPCI	Établissement Public de Coopération Intercommunale (FR)
EPF	Etablissement Public Foncier (FR)
EPT	Etablissement Public Territorial (FR)
ESH	Entreprise Sociale pour l'Habitat
FR	France
GLA	Greater London Authority (UK)
HLM	Habitation à Loyer Modéré (FR)
HUD	Department of Housing and Urban Development (US)
IRS	Internal Revenue Service (US)
L.A.	Los Angeles (US)
LAEV	Los Angeles Eco-Village (US)
LAUSD	Los Angeles Unified School District (US)
LCLT	London CLT (UK)
LIHTC	Low-Income Housing Tax Credit (US)
MAPTAM	Loi de Modernisation de l'Action Publique Territoriale et d'Affirmation des Métropoles (FR)
MOLLE	Loi de Mobilisation pour le Logement et la Lutte contre l'Exclusion (FR)
MPs	Members of Parliament (UK)
NAHA	National Affordable Housing Act (US)
NIMBY	Not In My Back Yard (US-UK)
NOTRe	Loi portant Nouvelle Organisation Territoriale de la République (FR)
OFS	Organisme Foncier Solidaire (FR)
OPH	Office Public de l'Habitat (FR)
PCF	Parti Communiste Français (FR)
PLH	Plan Local de l'Habitat (FR)
PLU	Plan Local d'Urbanisme (FR)
PSLA	Prêt Social Location-Accession (FR)
QPV	Quartier Prioritaire de la Ville (FR)
RNCHP	Réseau National des Collectivités pour l'Habitat Participatif (FR)
RUSS	Rural Urban Synthesis Society (UK)
SRU	Loi de Solidarité et de Rénovation Urbaine (FR)
TFL	Transport For London (UK)
TOC	Transit Oriented Communities policies (US)
TOD	Transit Oriented Development policies (US)
TSLA	T.R.U.S.T. South L.A. (US)
UCLA	University California Los Angeles (US)
UK	United Kingdom
US	United States
USTU	Soil/Tierra Urbana Limited Equity Housing Co-op (US)
USC	University of Southern California (US)

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INTRODUCTION

1. Why Should We Care About Community Land Trusts?

The tremendous increase in housing prices in major large metropolises, such as Los Angeles, London and Paris, illustrates structural market changes. In these cities– where housing became a way to secure investments– we observe the dissociation between market values and the social use of homes. This process leads to increased income and geographical inequalities, particularly impacting lower income households (Aalbers, 2016, pp. 1-14).

This financialization of housing markets was made possible through the acceptance, primarily in western countries, of ownership as an inalienable right and individual property titles as a means to deliver the highest and best level of efficiency (Needham, 2006).

In this context, Community Land Trusts (CLTs) represent a will to shift this paradigm through the capture and equitable repartition of land wealth. Considered anti-speculative tools, they aim to shift the essence of established property right systems towards collective ownership of land (Attard, 2013, p. 144).

CLTs can be defined as non-profit, democratic and locally-based organizations. They develop and manage genuinely affordable homes and urban facilities perpetually. Their mission is to withdraw, and permanently retain, lands from a speculative market, thus controlling real estate prices and preserving affordability over time for the benefit of local residents (Davis, 2010).
The initial CLT model was conceived in the US in the '60s, throughout the Civil Rights Movements. Down the road, the definition of resilient guiding principles broadened the model and made it more inclusive so as to allow it to be transferred to and adapted in different urban situations. It flourished in Europe, notably in British, Belgian and French cities.

2. Chief Aim of This Dissertation

When transferred to different contexts, however, the initial CLT model's substance and unity seems to be challenged. From this observation emerged the need to analyze CLTs in their diversity– with regard to international and national dynamics– and within the local contexts in which they operate. We believe this work will bring a clearer understanding of distinct models, and of their genesis and outcomes. Collecting and gathering knowledge is thought to be crucial for the development of common grounds, and ultimately, the development of sustainable transnational and international movements.

Building on the author's experience participating in an academic exchange at the University of California, Los Angeles (Fall Semester 2017), and her involvement in the SHICC European territorial cooperation program (Interreg, 2017-2020), this work explores the essence of different CLT models and questions how they have been shaped by given territories.

It supports the thesis that, as the CLTs circulate worldwide, they need to be rethought in their variety. It argues that context affects the CLT model through a triple constraint system; expressed at the national, metropolitan and individual scale. This dissertation, thus, tries to disentangle how these constraint systems influenced the definition and implementation of CLTs in dense urban contexts.

Through a comparative study, this dissertation focuses on three case studies (Downtown Los Angeles, Lewisham Borough in London and the City of Montreuil in the Parisian area), and on six CLTs or OFSs (*Organismes de Foncier Solidaire*) – for the French version - evolving in these areas.
For each case, it tests the impact of a triple constraint system (national, metropolitan, individual) on CLTs' missions (what, what for, for whom) and structuring (governance, scope, operation).

3. Dissertation Outline

The dissertation is structured as followed. Firstly, the conceptual framework lays the necessary foundation, providing an overview of CLTs emergence, circulation and structuration across three countries: the US, the UK and France.

Adopting a scalar approach, the case studies are then introduced in an intermediary chapter that focuses on national legal formalization of CLTs and OFSs. Echoing the conceptual framework (agenda setting and definition of typologies) it uncovers the precise nature and identity of CLTs as established in each country.

Following this, each case study (Downtown L.A., Lewisham Borough and the City of Montreuil) is introduced along with the metropolitan dynamics (urban governance, urban development and housing policies) that influence CLTs/OFSs development in each metropolis. The analysis of these forces tells us how political and financial resources are released and mobilized.
The following section explores individual CLT/OFS missions (goals, population targets, etc.) to see how they refine and orient CLT/OFS structuring from within.
Each case study is then summarized on the basis of the six CLT rules (what, what for, for whom, scope, governance and operation), analyzing outcomes.

The dissertation concludes with a comparative study of the three cases, returning to three levels of analysis (national, metropolitan, individual) in order to understand how they affect CLTs in each metropolis.

CONCEPTUAL FRAMEWORK
Building a Common Ground for Community Land Trusts in the Urban Context

1. Community Land Trusts, a Response to an Enduring Housing Affordability Crisis in Large Metropolises

The State of Affordable Housing in Large Metropolises

As a result of a continuous deterioration of housing affordability[1] since the 2000s, housing prices in large major metropolises such as Los Angeles, London and Paris have nearly doubled over the last decade. A quick snapshot of the housing market in these cities tells us that between 2008 and 2018, aside from the 2008 housing market crash, housing prices in L.A. increased by about 55% to reach an average of $682,600 in 2018 (Zillow, 2018a). In London, over the same period, a similar observation can be made. The average housing price in the capital city is today estimated to be £484,926[2], revealing an increase of 67% (Office for National Statistics, 2018). In Paris, finally, we observe an increase of about 43% for an average of €9,300 per square meter[3] (Paris Notaire Service, 2018). The average selling transaction has been estimated at €452,545[5] by "*Century 21*" Real Estate Agency, which represents an increase of €200,000 over the course of a decade (Century 21, 2017, p. 16).

Throughout the same period, related median income in those cities only increased, on average, by about 35%[6]. As wages don't follow housing price increase, properties become less and less accessible for would-be buyers, especially low-income households. Simultaneously, it becomes more difficult for the urban middle class and poor to retain their homes in the long run.

Many of them are, thus, forced to rent out their houses, increasing their vulnerability. Media coverage illustrates the magnitude of the phenomenon. For instance, an article in The Telegraph in the UK entitled, "*Generation Rent: London to become a city of renters*

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[1] As a matter of simplification housing affordability throughout this dissertation will be approached taking a "ratio" approach (housing costs to household income). However the author acknowledge the existence of a broader debate around household's residual income, housing accessibility, adequacy (Cai & Lu, 2015)

[2] Equivalent to $624,782 (October 2018).

[3] Calculated based on the old apartments market underlying the "Notaires-INSEE" indices for a one bedroom flat in Paris.

[5] Equivalent to $520,355 (October 2018).

[6] On average, in LA it increased from $42,045 n 2000 to $57,952 in 2016 (Census Bureau, ACS, 5 years estimate 2013-2017), in London it increased from £17,600 in 2000 to £27,200 in 2016 (London Data Store, Average Iincome of tax payers, survey of Personal Incomes by HMRC 1999-2016), in Paris the median income increased from €22,535 in 2006 to €26,668 in 2018 (INSEE, Filosofi, 2006-2018).

by 2025" (Fraser, 2016), predicts that 40% of London's population will be renters in the coming years. Likewise, renters already made up 61.7% of the population in 2015 in Paris (Insee, RP2015), and Los Angeles is known to have "*the fourth-highest percentage of renters in the nation*" (Chiland, 2017). This generation of renters is more prone to suffer from rent increase and evictions.

Additionally, we observe that housing price increase can also be at the root of economic and spatial inequalities. For instance, it has been shown in France that the poorest households[7] are 50% less likely to become homeowners and build a capital (Espacité, 2016, p.3). In the US, renters are shown to be twice as poor as owners (US Census & ACS PUMPS, 2017). For the poorest households such a housing crisis can lead to a decline in living conditions, opportunities and, ultimately, in freedom (Payne, 2001; Midheme, 2012). The most fragile of them are pushed into poverty or relegated to the fringes of the city (Aldridge, 2004).

The Dynamic Relationship Between Housing and Land Markets

Structural changes in the housing market of dense cities since the 2000s can be explained by a multitude of factors. Observing the private sector, we could for example cite, the difficulty of an inelastic supply to adapt to higher attractiveness in dense urban areas [8](Brueckner, 2011, pp. 115-124), or again, the financialization of the housing sector, where financial markets play a growing role in transforming accommodations into profitable commodities at the expense of their use (Aalbers, 2016, pp. 1-14).
On the public side, one could raise the impact of land use regulations limiting housing supply (Kok, Monkkonen & Quigley, 2014), the struggle for public authorities to control speculative activities[9], or again, the tendency from the public sphere to let the private market drive the affordable housing sector[10].

This dissertation does not, however, aim to delve into the causes of the housing affordability crisis in large metropolises, but rather has the objective of acknowledging the plurality of forces at stake, and more specifically, shedding light on the issue of land. Existing theories on the relationship between housing and land are multiple. On one hand, according the Ricardian theory (1817), demand for land derived from demand for housing. Land prices are thus tied to property prices. On the other hand, neoclassical

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[7] 1st quartile (25% of the most modest) compared to the 4th (25%of the most affluent).
[8] Resulting to an increase of demand due to a wider concentration of well paid jobs.
[9] See the Barcelona Manifesto against gentrification drafted by UCGL (July, 2018), the engagement of the London's Mayor for more affordable housing (May 2018), or the fail attempt of the City of Paris to control rent (November 2017).
[10] This trend, entrenched in the US model - e.g. the Low-Income Housing Tax Credit (LIHTC) - is also observable in Europe. If official positions differ across countries, we can cite as illustrations the 1% rent cut policy in the UK forcing Housing Associations to lower rents (Welfare Reform and Work Act 2016), or in France the current debates around the ELAN law weakening the affordable housing sector's main institutions and practices.

theories support the idea that because land is one of the main components of housing[11] (Needham, 1981, pp. 97-99), a rise in land price should have a repercussion on the cost of houses.

Although it is not our purpose to position ourselves in this debate, this point nonetheless shed lights on the correlation existing between land and housing markets; the housing crisis is just the tip of the iceberg.

Our focus is on the property rights governing, in an underlying way, land markets. Classical-economic legal theories support the idea that individual titles supposedly deliver the highest level of efficiency and freedom to individual owners, thus achieving the 'highest and best value' for the property (Needham, 2006. as cited in Midheme, 2012). In occidental countries, this paradigm leads to the common acceptance of land as an individual and legitimate right. For the purpose of this work it is important to note that this hasn't always been the case. We, for example, observe alternative ownership schemes in Latin America[12], Africa[13] and India[14] (Campbell, 2010, pp. 16-20) that are based on the conception of land as an inalienable common resource. It could be argued that current individual ownership schemes breed inequality and favor dispossession of the most vulnerable households as land tends to accumulate in the hands of the wealthiest (David Harvey, 2003 as cited in Bloomey, 2008, pp. 323-324).

Community Land Trusts, Capturing and Redistributing Land Wealth

In a context where individual land property title seems unquestionable, Community Land Trusts, and other shared homeownership systems[15], represent a will to shift this paradigm through the new approach to land socialization (Attard, 2013, p. 144). They notably echo 19th Century theories of capture and equitable repartition of the unearned social increment[16] (Georges 1879, as cited in Davis, 2010, pp. 5-7)

Instead of decreasing the owners' prerogatives–through taxation, for example–the CLT model, born out of the Civil Rights Movements in the '60s in the US, advocated for a change in the essence of the established property right system and a shift toward a collective ownership of land. The objective of CLTs is, as Jean-Philippe Attard states it, to "*set property at the service of the common good, redistributing land wealth*" (2013).

CLTs can be defined as non-profit, democratic, locally-based organizations. They develop and manage genuinely affordable homes and urban facilities perpetually.

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[11] *It indeed represents from 15 to 30% of final unit cost.*

[12] *In the Aztec culture the Ejido was a communal swath of land used for farming by the general public.*

[13] *In Africa, tribal communities allocated land to individuals based on the right to cultivate it (Ujamaa Vijijini).*

[14] *In India, the Gramdan movement, lead to the implementation of a private use of land while ownership was to be held by the community (Gram Sabha).*

[15] *Such as housing cooperatives, cohousing etc.*

[16] *Referring to the increase in land value due to the development of the surrounding society and not by any investment of the owner.*

Practically, they withdraw and permanently retain lands from a speculative market, thus controlling real estate prices and preserving affordability over time for the benefit of local residents[17] (FMDV, 2018).

Traditionally, the mechanism they rely on is the dissociation of land and property rights[18]. Ownership is split into two components: land and real estate upon it. Individuals generally own the real estate but lease the ground to the CLT. The land is set in a trust and is jointly owned by all CLT members. As a result, the land taken out of the market is separated from its productive use. The impact of land value appreciation is locked into the community[19].

In the "classical" CLT model, as developed in the US[20], the community plays a predominant role in governance in order to maintain balanced relationship between CLT residents and those living in the surrounding area. They work together to define the preservation affordability. They notably draft charts setting population targets, detail allocation processes and property price control processes through resale formulas.

In tense urban areas, CLTs function as anti-speculation tools. Controlling the values of the properties within their boundaries, they enable the provision of affordable housing and amenities for low-income households.
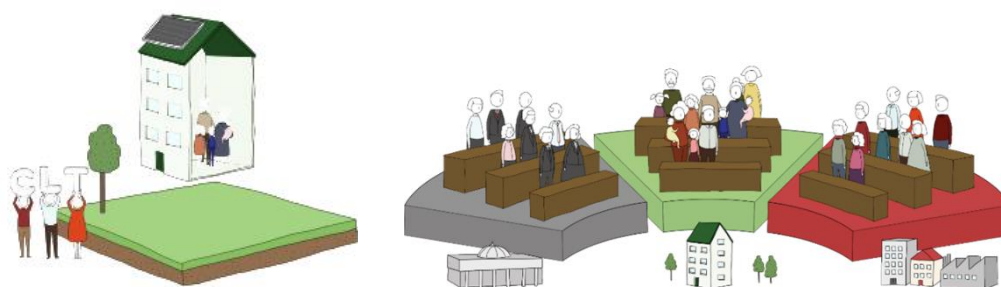
Fig.1. The Core Principles of CLTs
Collective ownership of land (on the right) and a tripartite democratic governance (on the left)
(Source: Monica Gallab, Community Land Trust Brussels, n.d.)

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[17] *It is on purpose that the terms "community based" and "participative/democratic" are excluded from the usual CLT definition in order to keep it as broad and inclusive as possible to foreign models. This point will be discussed later in the dissertation.*

[18] *With a specificity for the British system due to the pre-existing freehold/leashold system that made full ownership very rare.*

[19]*Throughout this work we will adopt Attard narrow definition of community as « all persons residing in the CLT territory. Whether or not these individuals sustain relationships on a daily basis, whether or not its members share common sociological characteristics » (n.d., p.5).*

[20] *Is it to be highlighted that foreign scholars and actors involved in CLT development in Europe often refer to the US CLT model as "classical," "traditional," "initial" (Attard, n.d.; Paris, 2018; Smith, 2018 etc.)*

2. Circulation of a Model: Bringing CLTs to the Agenda in the United States, the United Kingdom and France

This initial model–through the definition of resilient guiding principles–enabled a variety of CLT implementation forms to develop and fostered the structuring of a dynamic movement in the US.

Over the years, it has been regarded as the reference model sufficiently broad in interpretive scope, inclusivity and flexibility to be transferred and adapted in different urban situations. It became a framework outlining a set of beliefs, organizing knowledge, skills and practices (Benford and Snow 2000, pp. 618-619).

Labelled as a "best practice"–a procedure accepted or prescribed as being correct or most effective–in the Habitat III of the UN's New Urban Agenda (UN, 2017, art. 107,137) and the European Urban Agenda and its related Housing Partnership ("Toolkit For Affordable Housing Policies," 2018) as well as the most recent "Cities for Adequate Housing Declaration" (UCLG, 2018), the US CLT model is emulated in diverse regions of the world such as Puerto Rico, Bresil, Australia, Belgium, the United Kingdom and France, etc.

Given this proliferation, it is necessary to study how CLTs were put to the agenda as a solution to fight housing speculation in every country in order to understand how they gained recognition and have gradually evolved. With the idea of ensuring a legible comparison, we will rely on the Kingdon theory (Kingdon, 2014, pp. 165-195) trying to disentangle in these three cases how the concomitance of a problem[21], political[22] and a policy stream[23] opened a policy window for CLT implementation in the US, the UK and France.

United States: Fighting Minorities' Lack of Empowerment

If the story of the CLT emergence in the US is one of the most spread widespread in the sector, it remains, however, a necessary starting point for less informed readers. In this section, we will rely on Davis's 2010 narrative on "*The Origins and Evolution of the*

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[21] *Problem stream: where certain problems become identified due to some particular focusing of events or push by external actors. Sometimes, issues get political attention because of a crisis or change in the scale of problem.*

[22] *Political stream: political will, a stream dominated by what we could call the "visible people in the government" (president, congressmen) that identify the issues of political importance. This choice depends on the national mood, the political party in power, or existing issues driving political actors to mobilize*

[23] *Policy stream: which is dominated by researchers and academics that go deep into the details regarding issues to develop some "accepted solutions in anticipation of future problems" to then find the appropriate time to "exploit or encourage attention to a relevant problem."*

Community Land Trust in the United States" and its interpretation in later research works (Attard, n.d.; Campbell, 2010; Davis, 2018; Paris, 2018b, etc.).

Looking back at the Jefferson[24] and Roosevelt[25] eras in the United States, the US social and political construct of the "American Dream" has held tight to the inalienable right of homeownership. Paradoxically, this access to property has been limited for certain ethnic minorities through racial policies, notably through the National Housing Act of 1934 which institutionalized "red-lining[26]" practices leading to mortgage discrimination (Jackson, 1985, pp. 190-218).

The Civil Rights Movements of the 1960s took its roots in this breeding ground of spatial segregation and increased inequalities in terms of rights and service provision. The lack of governmental support of racial minorities, especially in rural areas, motivated the creation of what would become, less than half a century later, a nationwide Community Land Trust movement. Going beyond the initial period of protests, CLT activists– including Slate King, Martin Luther King's cousin–identified the need to build and secure a new order enabling the emergence of a fairer society (p. 13). Relating to the importance of ownership in the expression of US citizenship, they established land reform and economic self-sufficiency of the African American community as an essential means to gain political power and recognition.

Moving away from the Civil Rights Movements the CLTs broadened their scope to the empowerment of any low-income communities in the late '60s. In the urban context, a shift from the need to acquire and cultivate agricultural land to the need to fight displacement and provide affordable housing to the most disadvantaged communities occurred[27]. CLTs were starting to be considered as a means to foster "*development without displacement*" and fill the existing service gap (p. 20). From the '60s to the '80s, successive generations of CLT activists defined and redefined[28] the essence of CLTs until they finally established a new blueprint in first *The Community Land Trust Handbook* (1982). This book details the foundations of contemporary CLTs.

In this process, the Institute for Community Economics (ICE) played a prominent role. In the late '70s, they worked on the diffusion of model documents, standard procedures,

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[24] *"We hold these truths to be self-evident : that all men are created equal; that they are endowed by their Creator with certain unalienable rights; that among these are life, liberty, and the pursuit of happiness." (United States Declaration of Independence, 1776).*
[25] *"A nation of home owners, of people who own a real share in their own land, is unconquerable." (Special War Conference of the United States Savings and Loan League, 1942)*
[26] *In reference to the practice of delineating by a red line the areas in which banks should avoid investing. This practice led to refuse or limit loans to minorities located in specific geographical areas.*
[27] *Usually defined through a racial characteristic and a low Average Median Income (30-50%AMI).*
[28] *Notably through the attempt of defining a new model for land tenure in the* Community Land Trust*, published in 1972.*

promotion and training. They introduced CLTs to a wider audience, collecting CLTs' best practices and making them mainstream.

One of the biggest steps achieved in terms of recognition was the acceptance of CLTs as non-profit (501c3) organizations by the IRS (Internal Revenue Service). This status secured CLTs access to financial resources from public authorities and private foundations and well as the benefit of tax exemption.

Secondly, the National Affordable Housing Act (NAHA) in 1990 saw the creation of special funds for Community Housing Development Organizations. Determined to get funding from this program, CLT activists felt the need to be officially recognized as Affordable Housing providers. Not trusting the federal government in drafting this definition, they called for the help of then-congressman Bernie Sanders. Having supported the creation of the Burlington CLT (Vermont) as Mayor of the City, M. Sanders pushed for the entrenchment of a CLT legal definition in the Housing and Community Development Act (1992). The amendment, supported by advocates, got signed in without any further modification.

▶ We thus observe that CLTs emerged in the US in the light of minorities' lack of empowerment as a way to fight for services and against displacement. Activists and researchers shaped and refined the concept of the CLT over several decades (from the '60's to the '90s), and subsequently CLTs were legitimized through the successive legal and political moves.

United Kingdom: Involving Communities in Urban Policy through Power Devolution

The UK's CLT development process is rooted in a long history of property dissociation practices[29] going back to the 17th Century, and today, is entrenched in its land tenure system (Smith, 2018, pp.3-13). In fact, US CLT activists were inspired by UK experiments even before CLTs emerged in their own country; especially by Ebenezer Howard's model of Garden Cities[30] (1902). The modern English Community Land Trust resurfaced in 1970s[31], 1980s[32] and 1990s in light of a heterogeneous conjecture that we will briefly

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[29] The UK land tenure systems is based on two different forms of legal ownership: the landowner is holding a freehold, on the other hand, the owner or renter of the estate holding a leasehold.

[30] In Letchworth, 1903, Howard carried out his utopian society model based on an original land tenure principle: the rent-rate system, a mechanism where residents pay a "rate" for their services and those who invested in the initial development receive a "rent" in return.

[31] Through the creation of the Land Trust Association in the 1970s, "one-nation Tories" land owners aimed at preserving their lands from new taxation introduced by the Labour Prime Minister of the time, Harold Wilson, putting them at the disposal of their community. They had played a crucial role in putting their land to trusts at their agricultural value giving away the development potential.

[32] Implementation of the Stonesfield Community Trust in Oxfordshire, 1983.

summarize below for the purpose of this work (Smith, 2018; Hill 2015, 2017; Hill[33], personal communication, February 2, 2018).

First, CLTs emerged as a viable option with regard to estate maintenance and rehabilitation issues, in both urban and rural areas. In Birmingham, a CLT-like experiment was implemented in order to facilitate the rehabilitation of elderly people's homes. The initiative was led by Pat Conaty, a Canadian-born activist and associate of the New Economic Foundation, in close connection with the US Institute of Community Economics (ICE). In urban areas, the idea got the attention of local councils at the time of the introduction of the Estate Renewal Challenge Fund policy (ERCF, 1995). This government program aimed to rehabilitate large, aging Council Housing[34]. In both cases, the experiments fell short, but they nonetheless contributed to feeding a reflection on the potential of CLT implementation in the UK.

Later, in the 1990s, the UK faced a severe decrease in affordable housing supply. Due, in part, to the aftereffects of the Right-to-Buy policy introduced by Margaret Thatcher (which through the Housing Act (1980) enabling households to buy out, at large discounts, the Council Housing they live in[35] as well as to the phenomenon of second-home ownership, prevalent in touristic areas, such as Cornwall.

In this context, public authorities saw in CLTs several opportunities to implement local policies. Firstly, the model embodied the possibility of implementing competency devolution reforms (e.g. Local Government Act, 1992 and National Strategy for Neighborhood Renewal, 2001). At the time, the national government was seeking to shift the power of neighborhood development and management to the local level, a policy trend thereafter defined as Localism (Moore, 2013).

Concerning housing specifically, local authorities acknowledged the need for new developments but were politically unable to support a pro-affordable housing position, as they risked being accused of trying to "destroy the market." Alternatively, some of them chose to support emergent initiatives carried out by grassroots communities, which were thought to be more legitimate in proposing alternative housing provision schemes. On the other hand, supporting Community Led Housing (CLH) was seen as a channel for local authorities to reach their affordable housing quotas.

Finally, the CLT model has also been a means for local councils to undertake a reflection on the management of their public estate. Although the 1990s Council Housing estates were considered liabilities, by the early 2000s, they started to represent considerable

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[33] *Stephen Hill, pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

[34] *In that framework, researches were digging into the possibility of transferring freeholds to ad-hoc CLT and leaseholds to an existing housing association. The latter would take in charge the rehabilitation.*

[35] *The number of dwellings owned by local authorities in England declined from 5.1 million in 1980 to 1.7 million in 2014.*

assets, especially in dense urban areas. In the context of public finance turmoil, local authorities faced the need to "fill the coffers" but were nonetheless more cautious about the sustainability of their income.

Advocating for community-led empowerment, it was a joint conglomerate of legislators, advocates, researchers [36] and politicians–representing the Community Led Housing sector as a whole[37]–that pushed for the legal recognition of CLTs in early 2007. The outcomes sought were notably: getting better access to funding from banks and building societies, and gaining weight in political discussions. After a first failed attempt, a CLT definition was included in the 2008 Housing and Regeneration Act. Simultaneous to this legal process, the national government gave the Carnegie UK Trust a grant to develop the pilot of the National Community Land Trust Demonstration program (CFS, Sept 2006-Dec 2008). The government renewed its support for Community Led Housing in 2009 by initiating a public consultation, through the Localism Act 2011[38], and in 2016-2018 by launching the Community Led Housing Fund (House of Commons Library, 2017).

▶ In summary, we observe that CLTs were first put on the agenda in the UK in response to housing issues (rehabilitation, affordability crisis). Some politicians were willing to sustain pro-housing policies throughout power devolution. The model was defined in cooperation with the US Institute of Community Economics (ICE), a Community Led Housing conglomerate and supported through various government programs.

France: Stimulating Social Homeownership Policies

Finally, the analysis of the development of the *Organismes de Foncier Solidaires*[39] (OFSs, for their French acronym) must be placed in the context of France's reconsideration of its affordable housing system as a whole–both rental and acquisitive.

On one hand, traditional social homeownership policies as implemented since the '80s (1984, law n ° 84-595) have proven limited[40]. Although these policies have taken on

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[36] *Two scholars have been notably prominent stakeholders in providing showcase and pushing the CLT agenda at the Salford University (Manchester) through the Community Finance Solution, a research unit specialised in community asset ownership (Dayson, Paterson & Conaty, 2001).*

[37] *Including Housing Cooperative (Collectively owned and democratically managed affordable homes) and Co-Housing (intentional communities, run by their residents were household has a self-contained, private home as well as shared community space).*

[38] *Allowing communities to bypass planning permissions to ease development.*

[39] *On the question of knowing if the OFS could be merely be translated to Community Land Trust, we let the debate open, but would favor, as of today, using two differentiated terms.*

[40] *As an illustration, the 2017 evaluation conducted by the CGEDD, depicted one of the flagship instruments of this policy, the PSLA, as a niche product (p.52). In France, 16,500 of this type were sold in 2017 (USH, les HLM en chiffres, p.17), 8700 of which were social rental units sold to their tenants (Le Rouzic, 2018).*

various forms, they mainly relied on three pillars: improvement of households' solvency[41], support through guarantees[42] and promotion of social rental housing sales to their tenants (Le Moniteur, 2017). However, the numerous operational devices[43] developed over time in that vein have remained incomplete. Notably, the public authorities supporting such policies–to up to 1/3 of the unit cost–were unable to guarantee the long-term social impacts of their investment. They had limited tools in hand–such as a 5- to 10-year anti-speculation clause–to prevent the unit from falling back into the regular housing market after the first sale. In the context of decreasing public subsidies, public bodies started arbitrating against subsidized homeownership, especially in highly pressurized zones [44] (Lourier [45], Personal communication, February 23, 2018).

The other force at work in the OFS genesis was the questioning of the existing French social rental system. The current government indeed actively worked towards reforming its functioning presented as aging, costly and unsustainable (Rey-Lefebvre, 2018). The recent *Loi Elan* (2018) illustrates this will of rationalization, notably through a call for partial privatization in order to recapitalize operators[46] and the merging of small housing stocks to improve an economy of scale.

Assuming that the current social rental system is impeding tenants' residential mobility (Union Sociale pour l'Habitat, 2016), the main political goal was to find an alternative way to foster access to homeownership bypassing backlogs of previous attempts. The OFS–introducing a perpetual control on the housing resale price and guaranteeing the socio-economic profile of its beneficiaries–was also an opportunity to limit the social impact a State withdrawal trend would have on the affordable housing sector.
The actors involved in its design were interested in finding a solution that would (1) lock the public investment into the ground, and (2) support local public housing policies (Paris[47], Personal communication, February 10, 2018).

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[41] E.g. Zero Interest Loans (Prêt à Taux Zéro, PTZ), Social Loans (Prêt d'Accession Sociale, PAS), Rent-to-Buy schemes (Prêt Social Location-Accession PSLA).

[42] Notably, buyback and resettlement guarantee.

[43] E.g. BRLIO (Bail Réel Immobilier Relatif au Logement): a property lease which introduced temporary land and real estate dissociation in French law (Construction and Housing Code, art 254-254, 2014), PASS-Foncier: A two-component instrument, firstly enabling borrowers to reimburse their home then the land on a second phase (construction lease scheme). In addition, it enabled borrowers to reimburse capital interest before reimbursing the capital itself (grace period loan), Emphyteutic and construction lease: type of contract where the owner leases its property for up to 99 years. The lessees benefits from a right of usage over the period of the lease, with the obligation or not to develop it, etc.

[44] For instance, Paris Municipality stopped social access to property initiatives since 2001 (under Bertrand Delanoë) to focus on developing social rental options.

[45] Vincent Lourier, Head of the Federation des Coop HLM, a network of Cooperative Affordable Housing Developers. They are focused in developing affordable units for ownership. Those Developers differs from Social Landlords specialized in the rental system.

[46] The basic argument being that one unit sold would enable to build three more (Le Rouzic, 2018).

[47] Romain Paris, former Head of the Urban Planning Department of the City of Montreuil.

Drawing from the CLT success stories in Anglo-Saxon countries, this scheme presented for French decision makers–from every political orientation[48]–the advantage of being an administrated form of ownership involving a great variety of actors (municipalities, private and affordable developers, foundations, etc.). Most importantly, the instrument would foster the production of a "*liquid and unmarked product*", easy to implement and monitor, and which would not require the creation of ad hoc entities (Lucats, 2016).

This vision, centred on the role of the public sector in the development of the French OFS, must nonetheless be nuanced in light of a more comprehensive stakeholder analysis. The significant role of the public sector, notably through North Department Deputy Audrey Linkenheld (Municipality of Lille), the *Etablissements Public Foncier* (EPF, public land institution) and some social landlords, cannot be ignored, but other key actors should be highlighted as also having played a significant role.

First, we must acknowledge the *Federation des Coop HLM* (Cooperative Affordable Housing Developers Federation) whose mission is to foster the development affordable homeownership for middle-income people. The organization has been at the forefront of numerous innovations in terms of access to ownership[49] including the OFS. These developers, highly dependent on public support to access land and develop housing, had an interest in enhancing a tool that would be backed by public authorities.
Additionally, the civil society, notably CLT France[50], also took part in the process of OFS definition. In partnership with the national CLT networks from the US and the UK, as well as the Belgian initiatives emerging in Brussels and Ghent, scholars showcased the potential of a CLT transposition to the French context providing literature and dissemination articles, in the specialized and general press from 2012 to the present day (Attard, 2013, 2015; Le Rouzic, 2015, 2017, 2018; Morel 2017; Paris, 2018a).

Coming to the concrete formalization of the instruments, the story can mainly be told through the analysis of successive legislation (2014-2017[51]) which led to creation of a dual structure: the OFS (*Organisme de Foncier Solidaire*), the land trust entity, and the BRS (*Bail Réel Solidaire*), the long-term lease binding the OFS and the buyer.
The first OFS were accredited in 2017, starting in the City of Lille (OFSML, March 2017), followed by the *Fédération des Coop HLM* (*Coopérative Foncière Francilienne,* July 2017) and other Municipalities in France (such as Rennes, Biarritz, Saint Malo, etc.).

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[48] *Interestingly enough – and also true in the UK political environment – the development of a permanently affordable housing ownership system (through the CLTs or the OFs) is supported by all the fringes of the political sphere. When the most leftist would see in the OFS an opportunity to "get the land back to the people," especially to the most marginalized, the conservative parties consider the opportunity of providing a house to the middle, hardworking, class not being able to house itself on the open market.*
[49] *BRILO, PSLA, PASS etc.*
[50] *The association run by M. Jean-Phillippe Attard and Vincent Le Rouzic, is now dormant.*
[51] *ALUR Law 24.3.14 / Ordinance 20.7.16 / Loi du 27.1.17 / Decree 12.9.16 / Decree n° 2017-1037 of the 10.5.17 / Decree n° 2017-1038 of the 10.5.17*

The OFSML signed its first BRS with a purchaser in November 2018. As of today, a handful of OFSs have been accredited and more are being planned.

▶ In the French case, finally, we observe a relative failure of previous social homeownership policies and the questioning of the existing social rental system. This situation pushed politicians and other actors involved (developers, scholars) to consider CLTs as a viable option. In the context of public subsidy decrease, it could efficiently contribute to implement local housing policies and favor the residential mobility of the lower middle class.

From this analysis of CLTs and OFSs models emergence in the US, the UK, and France, we observe cross circulations (Béal, 2015). The circulation of this model has not only been horizontal, occurring transnationally or between cities (e.g Burlington, London, Brussels, Paris), but also has taken a vertical dimension through a dialogue between the different states or federal levels and local political spaces (e.g. coalitions of activists pushing for the legal definition of CLTs). The CLT model can therefore be put forward as an illustration of an increasing resort to models and exogenous experimentations in order to guide urban policies (p. 106).

In each of the three contexts, the housing affordability issue was the issue from which contemporary CLT developments emerged. However, in each case, the resulting stream of problems motivating the agenda setting (social claims from minorities, devolution of power, rehabilitation, policy failure, etc.), has been highly variable and dependent upon specific urban policy practices and political context (localism, institution driven, etc.).

It appears that in all three countries, advocates, activists and legislators aligned on the urgent need to rethink property rights to ensure affordability and sustainability. The fight against income and geographical inequality in cities has been set as a broad objective and CLTs have been seen as a "best practice" in order to solve this issue. However, the use to an existing ad hoc model, in regards of the diversity of problems faced, could lead us to wonder if similar goals are being pursued.

3. The Emergent Need of Building Consistent National Typologies

As a result of the circulation and proliferation of CLTs, we observe a need to "*bring a conceptual order*" (Smith, 2018, p. 2) through the identification of common themes, constants and specificities among national models. Even though a debate exists on the question of knowing if this exercise of differentiation and specification is not counterproductive in the development of a broad CLT movement, we observe in recent literature an effort to define national typologies (Davis, 2010, Smith, 2018).

United States: Building a Master Framework
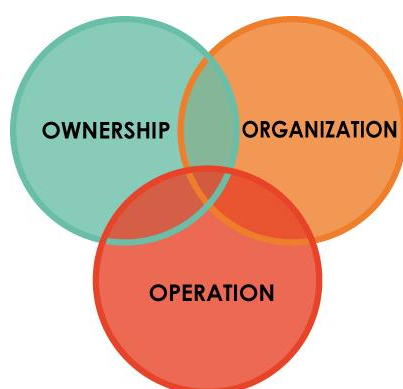
As shown in the previous section, the definition of the US CLT typology results from a long process of definition (Attard, n.d., pp. 6-7), synthesized in three features: ownership, organization and operation (Davis, 2010).

The Ownership structure defines the juridical model and fractionating of the property, the "*relationship between the individual and the land. It defines the rights and responsibilities of individual homeowners [and make sure those are] balanced against those of the landowners.*" (p. 2). Most importantly, the ownership structure of a US CLT defines that: the land is owned collectively, it is permanently removed from the market, and real estate improvement (such as housing units) are held separately from the land.

The Organization structure, defining the democratic governance enforces the community orientation of the CLT. It clarifies the "*relation between the people living on the CLT and on the surrounding area [and balances the power] between people living on the CLT's land and people residing in the surrounding community*" (p. 18). This part insists on the non-profit character of the organization and defines the open membership to anyone living within CLT boundaries. In terms of governance, the majority of the board have to be elected by members, and a tripartite governance balances the divergent interests (public authorities, residents, members).

Finally, the Operation structure, defining the economic model, balances forces between the commitment to building wealth and the preservation of affordability (p. 24). This part sets the population target and details allocation processes and the control of property prices through resale formulas.

United Kingdom: Establishing Local Institutions
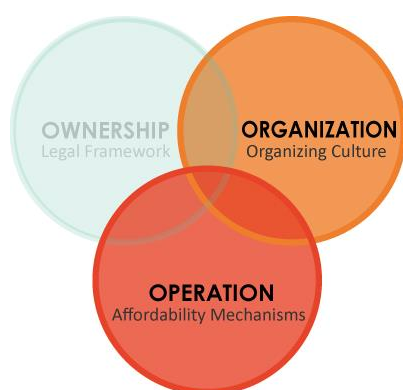
The recent typology drawn by Dave Smith[52] (2018) shed light on three funding criteria defining the UK CLT model: the legal framework, the organizing culture and the affordability mechanisms (pp. 31-39).

We would argue that two of the three characteristics highlighted by Davis (2010) in his analysis of the US CLT model are still persistent–under different forms–in the UK context: the Organization and the Operation structures.

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[52] *External Affairs Manager at the National Housing Federation (Former London CLT CEO).*

The Organization structure enforces the community orientation of CLTs. Shedding light on the "*organizing culture*" through the approach of civic agency[53] Davis reasserts its importance. He supports the thesis that grassroots organization and community building are at the heart of the UK CLT culture and reaffirms their central role in "*getting the land in the first place.*" Stephen Hill[54] corroborates, stating "*It is important in our political system, it gives us a democratic legitimacy*" (personal communication, February 2, 2018).

Secondly, the "*affordability mechanisms*" strongly recall the UK version of the operation structure. They balance the needs of "*building wealth and preserving affordability.*" Reflecting the specificities of the UK context, they reorient CLTs towards the housing issue.

To conclude, we argue that less emphasis is put on the Ownership structure due to the pre-existence of dissociated property models (freehold/leasehold system). The CLT doesn't bring forward in itself a new ownership model. The legal framework is, thus, considered as a baseline but "*fails to really tell the story of what CLTs are about*" (Smith, 2018, p. 32).

France: Defining Tools

The recent nature of the OFS makes it more difficult to rely on the existing literature to define a typology.

Even though this point would require deeper research and debate, we submit the idea that the French typology lies in the couple *Organisme de Foncier Solidaire* (the trust), *Bail Réel Solidaire* (the long-term lease). This duality is strongly emphasized in the legal framework.

Even though the BRS defines "*the relation between the individual and the land*" we propose the idea that the BRS, enforcing pre-eminently the affordability mechanisms (monthly ground lease, resale formulas, etc.), is an operating device. The OFS, functioning as a trust, secures, on the other hand, the perpetuity of an innovative form of ownership.

As the Organization structure isn't defined in the legal framework–besides its non-profit aspect–it is less significant as of today. At its creation, the OFS was meant to become "*a new actor in the affordable housing landscape*" (Morel, 2010, p. 20). As of today, we would argue, it can rather be considered more as a production mode implemented through innovative instruments. As a result, its governance doesn't emerge as a priority.

▶ Based on the analysis of the initial "*classical*" CLT model or "*master framework*," we see that the definition of the CLT and OFS models are always centered on the triptych:

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[53] *Capacity of a group to act cooperatively and collectively on a shared issue.*
[54] *Stephen Hill, pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

ownership, operation and organization. Even though variations in their understanding diverge or overlap, the Operation structure is a constant in defining affordability mechanisms and allocation processes. However, depending on the nature of the structure established (local civic institution or production mode) and relating to how and why they've been established (see. agenda-setting process), one of the other parameters is sometimes less significant.

4. Federation of Movements

The last tension point highlighted in the CLT literature lies in its duality and the hybridization of a model - a framework organizing knowledge and practices - and a movement, an alliance of people sharing the interest of instigating social change in land ownership structures (Davis 2010, pp. 35-39) Making use of a model, CLT advocates are organizing towards fundamental policy evolutions.

Building National Networks of Support in the US, the UK and France
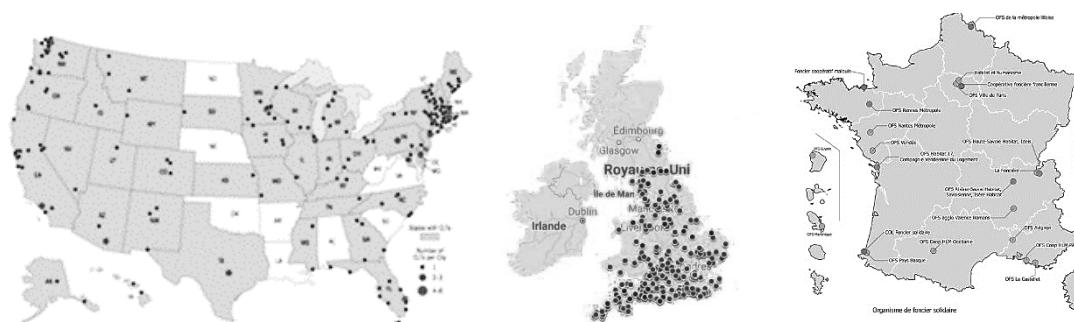
Fig.2. Networks of CLTs in the US, UK and France
(Source: Yesim Sungu-Eryilmaz, National CLT Academy, 2008, National CLT Network 2018, DHUP, 2018)

As we saw in the previous sections, a legal and political recognition, standardized definition and practices and an increased access to resources enabled CLTs to flourish and diversify (municipal or statewide CLTs, etc.) across the US. From a handful of successful CLTs in the '80s, more than 450[55] are currently in operation in the US (National Community Land Trust Network US). The essential step of this structuring was the creation of a national network in 2006 helping out with technical assistance.

In this process of movement-making, some outstanding CLTs have been raised as champions and have had their achievements relayed worldwide. Cited as inspiring examples, they highly contributed to the development of the model abroad.

Two such CLTs are the Champlain Housing Trust, which has developed 500 units, and manages 1500 rented units (Burlington, Vermont,1984), and the Dudley Street

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[55] *Half of which have been created since the 2000's.*

Neighborhood Initiative, which has gathered over 1000 members and acquired or built over 300 units (DSNI, Boston, MT, 1984).
In the US, CLTs usually remain small facing some political and financial shortcomings, but these two organizations managed to scale up and prove the concept.

Following in the footsteps of the US, the final stage of CLT structuring in the UK was the creation of the National Community Land Trust Network (NCLTN) in 2010. The network today provides technical (consulting) and financial assistance through its "start-up fund" and various other grant programs. It lobbies and campaigns at the national level for the recognition and development of Community Land Trusts and Community Led Housing (CLH). Its latest achievement was the adoption of the Community Housing Fund in 2017 (£60 million grants per year over a 3-year period). As of today, *"261 Community Land Trusts are now established, and more than 5,810 homes are in the pipeline"* across England and Wales (NCLTN, 2017). The NCLTN received a special award for its actions toward the development of CLTs in the international CLT conference held by Grounded Solution in Oakland, CA, US in 2017. The next steps envisioned are the rapprochement of Community Housing initiatives into a broader Community Led Housing Movement and the development of sustainable provision schemes that would make these organizations independent from grants.

Finally, in France, an OFS-dedicated platform for exchange was formalized under the "*Foncier Solidaire France*" network in November 2018. It aims to gather all the actors engaged in the development of the OFS (municipalities, operators, land banks, participative housing movement, etc.) to capitalize knowledge and advance the legal and economic model.

Implementing a Translational Movement: The Experiment of the SHICC Program

Fig.3. The SHICC Program Geographic Scope (Source: Interreg, 2018)

In light of the cross circulations described earlier, some actors involved designed a specific program at the European scale. The Sustainable Housing for Inclusive and Cohesive Cities (SHICC) is a three-year program (2017-2020) born out of the will to address the growing housing affordability crisis in the urban areas of the northwest region of Europe by supporting the establishment on CLTs in this territory. It is led in collaboration with the Municipality of Lille (France), the National CLT Network (UK), the FMDV (France) and CLTs in London, Brussels and Ghent.

The SHICC program was built around three major axes: the recognition of the model legitimacy through the structuring of a European CLT network, the

implementation of a favorable financial and legislative environment, and the technical capacity building of existing and nascent CLTs.

It aims to federate a movement at the European level, bringing actors together through conferences and peer-to-peer events, an advocacy campaign, the implementation of a Start Up Fund, dissemination of information, etc.

Towards an International CLT Movement?

The launch of the Center for Community Land Trust Innovation (2017)–available under worldclt.org–whose mission is to "*establish a new platform for researching current CLT practices and for exploring novel variations and applications of the CLT model*' is also important to highlight as the basis of knowledge capitalization at the global scale. Launched in 2014 as an outgrowth of Roots & Branches, it is an online archive that is used to track the origins and evolution of CLTs in the US. As of today, the website is very much US-centered but when looking at the Board composition and the works it presents (case studies, books), we can clearly see a will for internationalization.

▶ We, thus, observe a mesh of multi-scalar networks expressed at different levels. They play a preeminent role in legitimizing the CLT model both nationally and internationally. Even if certain networks tie more or less privileged relationships, they nonetheless feed into one another.

5. Replacing CLT Models in Their Specific Constraint Systems: Bringing the Context Back in

The Phantom of the Model Erosion

In the conceptual framework we described the CLT model circulation and adaptation, the definition of specified national typologies and the emergence of CLT movement(s). At the light of this analysis, we would like to come back to the peril, identified by and raised by many scholars and activists: the potential erosion of the CLT model. John Davis raises this point stating that the intensive "*hybridization could become a bane for the model, diluting or extinguishing characteristics that have made the CLT unique*" (Davis, 2010, p. 38).

The risk we identify through the analysis of the literature is that the flexibility and adaptability of CLT might turn into its weakness. The risk is that "CLT" would become an ad hoc label without the shared definition of goals, leading to the dismantling of the master framework components (ownership, operation, organization).

The perspective taken in this dissertation is driven by this acknowledgment and by the will to build a common ground in light of the national and international dynamics at stake.

Building on this, we observed a gap in the literature regarding international comparison of CLT models. The existing literature is usually based on bilateral comparison from the

US. Most asks the question of how to transpose the US CLT model to their respective countries[56]. In the UK and France, where the model is now effectively transposed, the perspectives taken by the works produced become more technical. They mostly focus on CLT implementation mechanisms and related effects. The fields covered concern property development–notably through the extensive analysis of the affordability mechanisms–or touch upon community building and citizen governance (Moore & Mckee, 2012, pp. 280-290).

We, however, observe fewer analyses questioning the essence of the model and its update. Essentially, CLT research today ask questions about how CLTs work, how to adapt them and if they are efficient. It is less focused on what they become and what CLTs mean today at the international scale.

Both streams are, of course, complementary. We believe, however, that the development of sustainable transnational and international movements is not possible without clear understanding of national models, their genesis and the development of a common ground.

The CLT as an Institution, Adopting a Socio-Politic Perspective

This is why we will adopt a reflexive standpoint in order to analyze these fundamental questions. Getting to back to their roots, we will focus on CLTs as institutions.

Understood under their socio-political definition, institutions can be defined as the "*prescriptions that humans use to organize all forms of repetitive and structured interactions*" (Ostrom, 2005, p. 3). They are structures made out of rules dictating human interactions. The way these rules are defined is dependent on the context, which then affects the outcomes[57]. Diversity of context could, thus, explain diversity of institutions, the forms they take and the outcomes they produce.

For the purpose of this work, we have outlined six rules defining the CLT institution. They will be used throughout the dissertation as a baseline for comparison. Schematically, these components could be classified in two bigger categories: the mission–detailing the content of the institution–and the structuring–impacting its concrete form.

It is important to note that this institutional grammar (Crawford & Ostrom, 1995 pp. 582-583) has been defined empirically and is open to debate.

MISSION (content)			STRUCTURING (form)		
What	What for	For whom	Scope	Governance	Operation
Essence	Goal pursued	Pop. target	Boundaries	Management	Implementation

Tab.1 *The Six CLT Rules*

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[56] *As for illustration: The national CLT network US: has an international section presenting CLT experiment abroad. The National CLT Network, UK "resource" section mainly focus on research at the national scale. CLT France gathers classic literature on the US model and few vulgarization articles.*

[57] *In order to illustrate this point Ostrom is using the example of how, in markets, shopping rules differ according countries.*

The presupposition is that as CLT models circulated worldwide they need to be rethought in their variety. Unfolding these rules in a diversity of urban environment, we will try to disentangle how a given context affects them. This will enable us to explain existing discrepancies–and/or similarities–in CLT definition, implementation and outcomes.

We argue that context affects CLTs institutions through a triple-constraint system. This constraint system is expressed at the national, metropolitan and individual levels with every level impacting certain rules to different extents.

On the impact of these levels on CLTs rules, we will test the following hypotheses throughout the dissertation:

▶ HYPOTHESIS 1/ National frames, through specific public policy practices, set general guidelines and define the essence of national models.
▶ HYPOTHESIS 2/ Metropolitan frames influence, most importantly, the CLTs' structuring (i.e. their governance, scope and operational features).
▶ HYPOTHESIS 3/ Individual frames, on their side, influence CLTs' missions (population targets and objectives).

RESEARCH METHOD

1. Case Study Selection: Downtown Los Angeles, Lewisham Borough, London and the City of Montreuil

Throughout this dissertation, we will analyze how constraint systems shape CLTs by conducting a comparative analysis. In order to structure this dissertation, we will adopt a scalar approach comparing three cities (Los Angeles, London, Paris), in three countries (the United States, the United Kingdom and France).

These three countries have been chosen as they represent three levels of the CLT model evolution: from a mature field in the US to a recent experiment in France. This reading grid could inform us on the level of their institutionalization, notably through the development of national networks and access to resources.

Secondly, the three countries present a wide array of political and economic systems. Schematically, in the US, economic liberalism led to consider housing and other public services as commodities to be supplied by the private sector and regulated by the market. On the other end of the spectrum, France has a strong history of social welfare. Housing is entrenched in law as a "right" to be protected and to which every citizen has access (e.g.: DALO, 2007). Even though it is subject to discussion, the UK can be considered as standing in the middle. The withdrawal of the public sector from the affordable housing sector in the '80s and strong decentralized governance led to the hybridization of the two former models.

We believe these distinctions led to a different urban form and city management, with a repercussion on housing delivery and thus on how urban Community Land Trusts would operate. In the US, due to the importance of community organization policies—and notably of Community Development Corporations (CDC[58])—Community Land Trusts generally operate at a reduced scale fitting a given community. In the UK, the decentralization and pioneering metropolization process led to the reinforcement of local authorities as the suitable scale of political action (the "borough" in London). Finally, in France, CLTs - or OFSs - are run by institutions and accredited at the regional scale, although the implementation scale is left to individual discretion.

Finally, the choice to focus on urban contexts insignificant in itself. We observe that the housing issue in dense cities centers are the heart of the CLT movement resurgence from the 2000s.

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[58] *Community Development Corporations are non-profit organization providing services and support and support community development in a given neighborhood.*

Los Angeles, London and Paris benefit from similar influence on the international scene, making them comparable subjects[59]. They possess a similar housing tenure system. Being highly financialized they have all suffered from comparable housing affordability crises, as mentioned in the introduction. They also underwent or are undergoing important metropolization processes through territorial reforms and/or transportation projects.

In addition to this scalar approach, this work can also be read through other lenses. Readers previously unaware of the CLT models and movements will be able to understand how they developed and have been replicated and translated in different contexts. Readers already familiar with CLTs will find more specific elements of analysis concerning detailed organizational features of six CLTs.

Two CLTs will be analyzed for each case study. The scope of the case studies will be focused on the revitalization of the Downtown Los Angeles area, and the forces at work in both Lewisham Borough, London, and the City of Montreuil, a Parisian Metropolis.
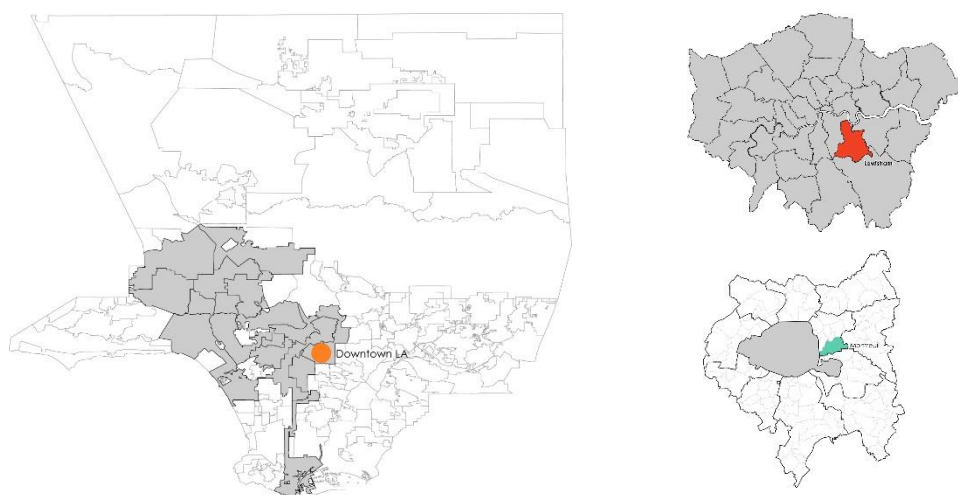
Fig.4. The Three Urban Areas Under Study
Downton L.A. (Orange), Lewisham Borough (Red), the City of Montreuil (Blue)
(Sources: London Data Store 2011, Los Angeles County GIS Data Portal 2011, Opendata.apur 2015,2017. Plotted by Diane Pialucha, 2018).

In Los Angeles, we will be analyzing the organization of local Community Land Trusts, a few miles away from major downtown developments. In the Angelino context, the very low housing supply due to different zoning measures coupled with the low efficiency of the affordable system led to a very tense situation in the studied zone.

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[59] *This choice is also the result of the author's life trajectories and opportunities.*

We will be more precisely presenting:

(1) T.R.U.S.T. South L.A. (TSLA), a 15-year-old Community Land Trust organizing a disadvantaged Latino community to fight gentrification and displacement in South Central L.A.

(2) And the Los Angeles Eco-Village (LAEV) using the CLT instrument as a means to implement a demonstrative environmental project.

Secondly, we chose to focus on Lewisham, a southern borough of London. It is located west of Southwark where massive urban renewal recently took place (The Shard, Elephant & Castle redevelopment, etc.) and south of the Tower of Hamlet Borough where redevelopments for the 2012 Olympics took place. Lewisham has drawn less attention than the other boroughs, but property prices are steadying rising.

We will analyze how two CLTs are working to prevent price increases in this historically popular borough of London. We will notably explore:

(3) The London CLT to see how a citizen initiative rooted in east London grew at the city scale.

(4) And the Rural Urban Synthesis Society CLT (RUSS) digging into the re-actualization of housing co-ops and self-built housing.

Finally, we will take a different perspective to analyze the attempt to conciliate metropolarization and housing affordability in the Parisian urban area focusing on the City of Montreuil. In the French context, the challenge is about developing social ownership, while guaranteeing the impact of public investments in the long run. Our research will rely on the study of:

(5) The *Cooperative Foncière Francilienne* (CFF), initiated by the *Federation des Coop HLM* (Cooperative Affordable Housing Developers Federation) to revive affordable homeownership at the regional scale.

(6) The potentiality of creating an OFS in the City of Montreuil, a radical left-wing city, historically supporting the development of participatory (or collaborative) housing within its boundaries.

On a concluding note, it is important to raise that even though the formalization of the Community Land Trust concept in the three countries occurred at somewhat different times, their development in the three metropolises under study is all fairly recent.

Indeed, in Southern California, especially in Los Angeles, the CLT sector is not as mature as it could be in North California. In L.A., we count three operating CLT, and one under development.

Even though there are more than 200 CLTs in the UK, urban CLTs are less developed; there are only a handful in London. Of the two CLTs under study, only the London CLT has delivered homes (23 units) as of today. Concerning the Parisian region, only CFF (*Cooperative Foncière Francilienne*) is operational. The City of Paris is finalizing its structure, and the project in Montreuil is on standby.

For the purpose of this dissertation, the CLTs will only be studied over a period of ten years. Consequently, this research does not aim to be an impact evaluation

Case Studies: The CLTS and OFS at a Glance*

Country	United States		United Kingdom		France	
City	Los Angeles		London		Paris	
Name of the Organization	T.R.U.S.T. South LA	Los Angeles Eco Village	London CLT	RUSS[60]	CFF[61]	Montreuil
Date	2005	2010	2007	2009	2017	*In standby*
Triggering Factor	Figueroa corridor campaign	1992 Los Angeles civil unrest	2012 London Olympics	Walter Segal experiment of self-built housing (80s)	Social homeownership agenda	Participatory housing heritage
CLT Boundaries	Major transportation axes	2 blocks or 1-mile radius from the train station	From East London to Greater London	Lewisham Borough, to be replicated in London	Regional	Municipal
Legal Structure	501c3[62]	3 non-profits (501c3)	Community Benefit Society[63]	Community Benefit Society	Cooperative	*n/a*
Objectives	Get at the front of the systemic structural issues (racism, inequalities etc.)	Demonstrate an alternative ecological model of community living	Fight real estate price increase and implement local democracy	Create sustainable community-led neighborhood and affordable homes	Foster social access to homeownership in the First Parisian Ring	Support local initiatives, and ensure the sustainable impact of public investments
Population Target	Low income marginalized community	Intentional community	Modest to middle income households	Modest income Londoners willing to build their own home	Tenants in the social rental housing market	Modest household residents living Montreuil
Mission	Stabilize neighborhoods south of downtown Los Angeles	Environmental and economic sustainability	Provide genuinely affordable homes and develop cohesive community	Environmental and economic sustainability	Produce housing for moderate-income households at a moderate price	Secure the provision of public services
Governance	Membership organization	Volunteer-run	Deconcentrated	Volunteer-run	Cooperative Governance	*n/a*
Operation	Organizational committees, partnerships	Self-reliant practices	On demand of local communities, partnerships	Self-reliant practices, partnerships	Traditional affordable housing provision	*n/a*
Membership features	70–100 members, $25 annual fees and community service	+/- 100 members. 6-months membership process	2,500 members, £1 share	600–700 members, £1 share	13 founding members (developers), partnership with municipalities	*n/a*
Assets	4 properties	6 properties	2 properties	1 property	3 properties under dvlp.	1 pilot project in standby
Parallel Activities	Mobility, advocacy, leadership development	Advocacy, development of economic activities	Advocacy, capacity building	Training, food growing art projects	*n/a*	*n/a*

See. Appendix for more details

Tab.2 *Summary of the CLTs and OFSs Analyzed*

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[60] *Rural Urban Synthesis Society.*
[61] *Cooperative Foncière Francilienne.*
[62] *Non-profit organization exempt from federal income tax under section 501(c)(3) of Title 26 of the United States Code.*
[63] *Type of organization which mission is to benefit the community. Their members hold shares and any profit made by the organization must be used for the benefit of the community.*

2. Data Collection

Research Method

This research was conducted in two phases. The pre-study exploration (December 2017–January 2018) generated an understanding of the concept of CLTs in the US including their rise, development and circulation. This phase was fundamental in the generation of the hypotheses and the research question.

The main study then took place over the course of three months (February–April 2018) in order to confirm or infirm these hypotheses. As much as possible, a systemic procedure was put in place to test the hypotheses through interviews and observations. The analytical objective was, through the dissection of Community Land Trust characteristics (or rules), to qualify variations and establish causal relationships.

The data collected (interviews, conferences, lectures, observations) were transcribed to be used as first-hand material and then coded in order to extract data and establish discourse comparisons. The same method was applied to the analysis of the documents transmitted by interviewees and to more theoretical readings.

Data Sources

This study relied on different sources of data which aimed to be crossed and compared. The main source of information was empirical work. We conducted four on-site participant observations as well as 15 semi-conducted interviews and then gathered and evaluated the knowledge acquired. In addition, we interviewed a wide variety of actors for every case study: board members, staff, public representative, members, inhabitants, and activists.

This dissertation has been made possible thanks to an academic exchange pursued at the University of California, Los Angeles (UCLA) during the fall semester 2017. During this period, we had the opportunity to get acquainted with the CLT concept and analyze its structure within the Los Angeles context.

Additionally, we was involved in the Sustainable Housing for Inclusive and Cohesive Cities (SHICC), European Interreg on the behalf of the Global Fund for City Development (*Fonds Mondial pour le Développement des Villes*, FMDV). Within that framework, we had the opportunity to work on the development of financial tools fostering innovative affordable housing models in the north western European Region. We worked in collaboration with the London CLT, Gent and Brussels CLTs, as well as the Lille OFS (OFSML).

We also had the opportunity to conduct fieldwork for a week in London (February 24th–March 1st 2018), which enabled the meeting and the interview of British actors.

This empirical work was complemented by a theoretical reflection during the UCLA exchange period and beyond. It concerned housing affordability, gentrification and the role of communities and public authorities in developing affordable homes.

NATIONAL LEGAL FRAMES
Bringing out Shared Identities

As shown in introduction, the structuring and proliferation of CLTs was made possible through the development of common conceptual constructs: definition of typologies, standardization of documents and practices, use of consistent language, etc. (Kelly, p. 200. as cited in Moore & Mullins, 2013, p. 15). In addition, legal definitions contribute to the clarification of core principles, increase public understanding and awareness, and enable access to resources–either political or financial (pp. 12-15).
In that regard, they represent an integral part of a shared identity building process.

This is why–even though the number of CLT and OFS definitions is plethoric[64]–this intermediary chapter focuses on the CLT and OFS legal framework. It will bridge the conceptual framework chapter (focusing on agenda setting and typology) and the case studies.
Although legal definitions result from cross circulations, bear different weights, and emerge at different time, they are very insightful about how CLT identities are defined and implemented locally.

1. United States: Enshrining the Three CLT components in Law

For purposes of this section, the term "community land trust" means a **community housing development organization**:
(1) That is **not** sponsored by a **for-profit** organization;
(2) That:
— **acquires parcels of land**, held in **perpetuity,** primarily for conveyance under **long-term ground leases**;
— **transfers ownership** of any structural improvements located on such leased parcels to the lessees;
— retains a pre-emptive option to purchase any such structural improvement at a price determined by **a formula** that is designed to ensure that the improvement remains affordable to low- and moderate-income families in perpetuity;
(3) Whose **corporate membership that is open** to any adult resident of a particular geographic area specified in the bylaws of the organization; and
(4) Whose **board of director**:
— includes a **majority of members** who are elected by the corporate membership and;
— is composed of **equal numbers** of lessees pursuant to paragraph, corporate members who are not lessees, and any other category of persons Described in the bylaws of the organization.
Federal law (Section 213, Housing and Community Development Act of 1992)

Analyzing the US CLT legal definition, we observe it gives practical details on the implementation of the three US CLT features as defined in the previous chapter: Ownership, Organization and Operation, [65] with three of the four articles directly referring to them.

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[64] *For instance, see definitions drafted by respective national networks (i.e. National CLT Network, UK, and US, CLT France website and "Foncier Solidaire France" network).*
[65] *As a reminder, the Ownership structure defines the relationship between the individual and the land. The Organization structure defines the democratic governance and enforces the community orientation of the CLT. The Operation structure, defines the economic model, balances forces between the commitment of building wealth and the preservation of affordability.*

The above section and Article 1 contribute to situating CLTs in regard to society as a "*non-profit*" and "*housing development organizatio*n." They informs us that CLTs are defined as local institutions directly linked to the provision of housing. In addition, their status as non-profit (501c3) organizations plays an important role in enabling them to benefit from tax exemptions and specific funding sources.

Following this, the idea of collective ownership through land and real estate dissociation is described in Article 2 ("*transfer ownership*," "*held in perpetuity*," "*ensure affordability*") along with the operating devices ("*long-term ground lease*," resale "*formula*"). The CLT principles of governance are detailed in Articles 3 and 4 through the phrases "*open membership*," importance of "*members*," and "*tripartite governance*."

To summarize, the US CLT legal definition appears to both present the general model's principles and enforce its implementation details. It echoes and results from the agenda-setting process which aimed to entrench an already tried-and-tested CLT model into law. Moving from the Civil Rights Movements to the empowerment of low-income urban communities, the CLT in the US is established, recognized and legitimized as a local institution filling public service gaps for low income households. This resilient framework draws upon guiding principles fostering the development of a diversity of experiments and their export abroad.

2. United Kingdom: Broadening the Scope of CLTs to Community Well-Being

"Community land trust" means a body corporate which satisfies the conditions below:
(1) Is established for the express purpose **of furthering the social, economic and environmental interests** of a local community by acquiring and managing land and other assets in order:
—to provide a **benefit** to the local community;
—to ensure that the assets are not sold or developed except in a manner which the trust's members think **benefits the local community**.
(2) Is established under **arrangements** which are expressly designed to ensure that:
—any **profits** from its activities will be used to **benefit the local community** (otherwise than by being paid directly to members);
—individuals who live or work in the specified area have the **opportunity to become members of the trust** (whether or not others can also become members)
—the members of a trust **control** it.
Section 79 of the Housing and Regeneration Act 2008

Concerning the UK case, the analysis of the UK CLT typology[66] in the previous chapter has taught us that the legal framework is not the most prominent parameter defining CLTs in Britain. Even if it has deliberately been set broadly to be used as a baseline, this definition reaffirms the importance of the organizing culture (Davis, 2018, p. 39).

Contrary to the US definition, the UK one focuses mainly on CLT missions and added value. The

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[66] *The UK CLT typology is based on three core principles: the legal framework, organization culture and affordability mechanisms (Davis, 2018).*

practical implementation devices are referred to as "*arrangements*," and are not further detailed. This perspective was meant to enlarge their possibilities and enable partnerships with other housing actors. To clarify, Stephen Hill[67] states: "*The idea was to be broad as possible to give them the opportunity to do anything. […] We were trying to create a kind of localized institution that would essentially be doing the same job as local authorities, giving itself the power of well-being.*"

Relating to the CLT agenda-setting process (emphasis on power devolution to the local level) the concept of "*well-being*" emerged as a leitmotif. Housing was presented by CLT advocates as a prerequisite to well-being. As highlighted in the introduction, a severe housing crisis can lead, especially for the lowest income households, to a decline or loss of living conditions and opportunity (Midheme, 2012). Put another way, "*if people are not housed at a price they can afford, then lots of other things are not going to come either*" (Stephen Hill, personal communication, February 2, 2018).

This idea is supported by the focus given to the *"economic, social and environmental"* aspects of CLTs rather the delivery of affordable housing.[68] As stated by Arid "*CLTs do more than create permanently affordable housing. They also deal with issues of employment, public space, local amenities, recreation and renewable energy*" (as cited in Smith, 2018, p. 18). Going beyond housing, this definition links CLTs to the wider interests of a community: their well-being.[69]

The other underlying postulate emerging from this piece of legal text is the self-determination of the community in achieving these wider interests or otherwise the need to "*liberate the potential of citizens to house themselves*" (Smith, 2018, p. 10).

The term "*community*"–cited five times–insists on the fact that CLT are "*to the benefit*" and "*under the control*" of a community. It is the mandate given to the community that enables democratic governance and long-term stewardship (Thompson, 2015, p. 1035, as cited in Smith, 2018, p. 10).

This observation confirms the idea that the capacity of a group to act collectively on a shared issue (civic agency) is at the heart of the UK CLT model. As Stephen Hill reaffirms, it, thus, falls directly within the US CLT heritage: "*all we took from the US relates to the community of place*" (personal communication, February 2, 2018).[70]

UK CLTs are hereby confirmed in their role of local institutions. Designed to be legitimized as partners and service providers. Complementary to local authorities they foster the well-being of their beneficiaries. Community organizing and democratic decision-making are enforced at the baseline of their governance principles.

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[67] *Stephen Hill, pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*
[68] *Even though this piece of legislation falls into the Housing Regeneration Act (2008).*
[69] *Community here referring to « all persons residing in the CLT territory. Whether or not these individuals sustain relationships on a daily basis, whether or not its members share common sociological characteristics » (Attard, n.d., p.5).*
[70] *Stephen Hill, Head of C2O futureplanners and pioneer in development of CLTs in the UK.*

3. France: Transposing an Anglo-Saxon Model to Define an Innovative Homeownership Model

	Organisme de Foncier Solidaire (OFS)	Bail Réel Solidaire (BRS)
General Description *[extracts]*	*Loi 2014-366, ALUR, 2014, Art. 164* The *Organismes de Foncier Solidaires* (OFS) are not-for-profit organizations. They are accredited by a State representative at the Regional level. All, or part, of their activity is to acquire and manage land, built or not, for the purpose of building housing and public facilities. The OFS remains the owner of the land and consents to the lessee a long-term lease providing him rights in rem on residential or mixed-use dwellings for rental or access to ownership purposes—if necessary, with the obligation to build or rehabilitate existing buildings. The contract is subject to income ceiling, and controlled resale prices.	*Loi 2015-990, dite loi "Macron", 2015, Art. 94* The Bail Réel Solidaire, is the rechargeable lease through which the OFS consents to lease the rights in rem of a property to a lessee.
Further details *[extracts]*	*Décret n° 2016-1215 du 12 septembre 2016 relatif aux Organismes de Foncier Solidaire* - mission: not to share benefits - financing: may receive in kind contributions from any public or private person - status, governance and scope are defined on a case-by-case basis - OFS contract agreement process	*Ordonnance 2016-985, 2016, relative au BRS* - lease duration: between 18 and 99 years - housing access conditions: primary residence, lessee obligations, etc. -clarifies: transfer and inheritance rights, etc. *Décret n° 2017-1038 du 10 mai 2017 relatif au Bail Réel Solidaire* - resale prices - income ceilings - allocation process - OFS monitoring and control etc.

Tab.3 *Summary of the Existing OFS and BRS Legal Texts*

Contrary to the US and the UK, where the definition of a legal framework emerged as an outcome, after many years of experimentation on the ground, in the French case the *Organisme de Foncier Solidaire* (trust) and *Bail Réel Solidaire* (long-term lease) have been defined through a series of laws, amendments, decrees and ordinances prior to their implementation. In France, the legal definition is inherent to the birth of the OFS. It defines an original ownership scheme not inscribed in French legislative culture: perpetual land and real estate dissociation through the implementation of trusts and rechargeable rights in rem.[71]

The OFS was first established in 2014 (ALUR Law) as the equivalent to an Anglo-Saxon Trust. Its mission is to acquire and perpetually manage land. The OFS has the right to establish long-term leases with contractors who would then take over the property development. The nature of the long-term ground lease is still itself not yet defined. At

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[71] *Even though we have to acknowledge the precedents set by tools such as the BRILO, PASS-foncier, emphyteutic or construction leases etc.*

this stage, the OFS legislation is incomplete and doesn't present much innovation compared to existing land banks or legal tools such as emphyteutic leases.

From 2015 to 2017, the *Bail Réel Solidaire* (BRS) came to complement the legal arsenal. It spells out land and real estate dissociation principles. At the national level, several pieces of legislation set resale formulas and, notably, beneficiaries' income ceilings and allocation processes. Would-be buyers are set according unit types, household composition and income[72]. Under French law, belonging to a certain community cannot determine access to rights or services.

Unlike in the UK, these legal texts focus primarily on OFS and BRS implementation details (contract agreements, households' income ceilings, allocation process, resale formula, etc.). In this regard, the national level is biding the OFS development more than it is the case in the US or the UK. The model does, however, leave some room for manipulation, especially concerning the juridical status, governance, scope, ground lease contracts, repayment fees or even fields of application (e.g. tense or depreciated areas, sales of social housing, rehabilitation, urban renewal schemes, etc.). This flexibility explains why the devices are often described as adaptive, and enabling diverse local strategies (Espacité, 2018).

The CLT transposition process illustrated in these texts enabled OFSs to benefit from existing affordable housing provision tools - such as concessional loans, guarantees, VAT tax breaks, etc. OFSs can today rely on traditional channels designed for social and affordable housing providers to develop homes. This aspect partly explains how they achieved their first results in a short period of time. This capacity emerges as one of the OFS greatest strength[73].

In a nutshell, we observe two main features making the specificity of the OFS, compared to the US and the UK CLT models. The first is the main focus set on housing delivery and home ownership (see. agenda setting process). Even though the housing issue is a constant for current urban CLTs, it is particularly significant in France where access homeownership for the middle class has been a driving force behind the model transposition. Nuancing this observation, it has nonetheless to be raised that legislative provisions allowing the development of rental housing or public facilities have been adopted. However, no decree detailing implemented modalities has been drafted to date.

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[72] *Even though not being legally bounding, local residents could however be privileged for given projects.*
[73] *As a matter of comparison, we count 3 CLTs in Los Angeles developed over the past 20 years, 46 units have been produced whereas 33 more are in project or under construction. In London, 16 CLTs have been created over the last decade, 66 homes have been delivered, several other hundreds are in the pipelines. Finally, in the Île-de-France Region, since the last operational decrees of 2016, 1 OFS have been accredited (Coopérative Foncière Francilienne, CFF, 2017). CFF initiated the development of 62 units over three sites and two more OFS are under development in Paris, and Montreuil.*

On the other hand, the actors involved in the OFS development are quite specific to the French context. As of today, mostly municipalities, social landlords, affordable housing developers, land banks, rather than grassroot groups, have engaged in the OFS. This situation can be explained by a multiplicity of factors.

First of all, to-be-OFS must be accredited by a regional Prefect. This accreditation requires substantial expertise in order to define legal status, ground lease contracts (BRS), establish a business plan etc. In addition, OFSs must also demonstrate their ability to guarantee the buyback of units at all time, an obligation which represents high financial risks. As a result, only robust institutions had enough resources–either financial or technical–to undertake preliminary experimentations within an unfamiliar and inchoate legislative context.

Besides these legal requirements, another side of reality is that the institutional framework developed since World War II to promote affordable housing in France is more developed than overseas. In a context of a partial State withdrawal from the affordable housing sector it is these actors (notably the local authorities and social landlords), who are taking over, as a guarantor of access to housing. However, this does not mean that current OFSs are closed to partnerships with local groups. For instance, collaborations are emerging between groups and OFSs in the regions of Paris, Annemasse or Lyon (i.e. CFF, EPFL74, Orsol).

To summarize, the analysis of the French national context highlighted the legal framework as significantly impacting the definition of the OFS (*Organisme de Foncier Solidaire*) and BRS (*Bail Réel Solidaire*) instruments. The OFS-BRS couple indeed represents a major legal advance and introduces an original ownership regime in the French culture. The legal texts thus focus on the specification of its operating mechanisms. An extensive legal process drew the outlines of the OFS' missions as a technical tool turned towards social homeownership for median-income households[74].
It emerged that the OFS model is first and foremost focused on housing delivery and is taken in charge by institutional actors (municipalities, developers, etc.). However, given the recentness of the model –latest decrees published in 2018- its full potentialities remain to be exploited.

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[74] *Under PSLA ceilings (Prêt Social Location-Accession). Income ceilings defined for a preceding buy-to-rent scheme (€32,442 for a single person in 2019 for the Parisian area).*

4. Conclusion

The comparisons of the national frameworks–through their legal definition–have helped us to understand similarities and differences between established models and have brought forth shared identities. These features are synthesized in the table below.

	UNITED STATES	UNITED KINGDOM	FRANCE
Year of application	1992	2008	2014
Legislation	Housing and Community Development Act	Housing and Regeneration Act	ALUR Law (*Loi pour l'Accès au Logement et un Urbanisme Rénové*)
Jurisdiction	Department of Housing and Urban Development (HUD)	Ministry of Housing, Communities & Local Government	*Ministère de la Cohésion des Territoires* (DUPH)
Definition	Community housing development organization	Corporate body	Organism accredited by the regional Prefect
Status	Non-profit	Non-profit	Non-profit
Target beneficiaries	Community: Any resident of a particular geographic area specified in the bylaws of the organization	Community: The individuals living or working in a specified area	Households below established income ceilings
Targeted sector	Housing (primarily)	Social, economic and environmental (with focus on housing)	Housing and public facilities
Activities	Acquire lands and held them perpetually	Manage land at the benefit of the community	Acquire and manage land
Governance	Open membership, majority of board is elected by membership, tripartite governance	Open membership, members in control of the CLT	Each organization to decide
Operation	Long term ground lease, resale formula	Each organization to decide	Long-term lease (BRS), rent limit and resale price restriction, allocation process…

CONVERGENCE		DIVERGENCE	
Status: Non-profit **Sector:** Related to housing **Activities:** Acquiring and managing land **Operation:** Affordability mechanisms		**Governance**: Community involvement or not **Beneficiaries**: Low- or median-income households, affiliated to a community or under given income ceilings.	

Tab.4 *Legal Framework Comparison Synthesis*

In a nutshell, we observe that similarities between CLTs and OFSs are significant. They mainly concern status (non-profit organisms), the field (related to housing, with more or less freedom of manipulation), activities (acquiring and managing land) and affordability mechanism (long-term lease, resale formula, etc.)

On the other hand, many of the differences observed between CLT and OFS models are due to the fact that they evolved in different political and juridical systems (e.g. civil law vs. common law). Notably, the withdrawal of the welfare state from housing provision in

the different countries led to divergences in terms of community and residents' involvement and governance.

In the US and the UK, a significant role was left to communities in terms of urban development and management, inducing the democratic and grassroots CLTs. In France, this role is left to institutional actors such as local authorities or affordable housing developers.

The role of the community is also at the root of the second-biggest divergence point between the CLT and the OFS: the definition of beneficiaries. They either relate to a community of affiliation (in the UK and the US) or are defined by income brackets (France).

We, thus, observe that legal definitions crystallize identities through fundamental principles defined at the national level. This confirms our first hypothesis put forward in the introduction. The essence of the CLT and OFS models (what they are intrinsically) is determined at the national level. National frames prescribe general guiding principles for CLTs and OFSs development.

In the US and the UK, CLTs represent local institutions filling a service gap or improving service delivery. In France, the OFS and the BRS are considered technical tools correcting a market and supporting local housing policies.

LOS ANGELES
Stabilizing Communities

1. CLT Development in a Constrained City
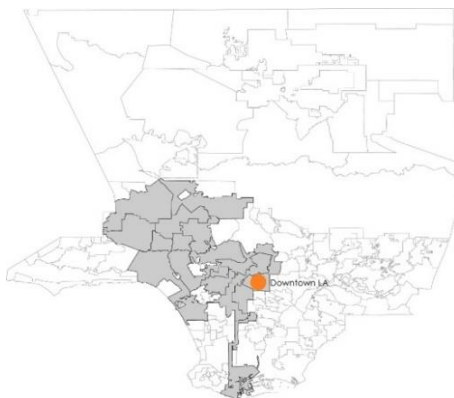
Despite the existing narrative about the current L.A. housing boom, new developments appear hard to complete in the city. Abundant Housing L.A, a pro-housing advocacy group, highlights that only 13% of the total L.A. housing stock has been built over the last 25 years. Additionally, fewer than 25,000 units have been produced between 2010 and 2015 (2017).

This situation takes root in the historical emphasis given to low-density developments–back in the '40s–that shaped L.A.'s unique urban form. As of today, very strict zoning constraints are still in place, with 78% of the city zoned for single-family housing, generous setbacks and parking space requirements. What ensues is a very low density of 3,200 habitants per square km[75] (Abundant Housing L.A., 2017).

At the same time, vacancy remains very high, above 12% on average, according to the American Census Bureau (ACS, 2017). The McKinsey Global Institute, for example, referenced up to 8,900 vacant parcels (equivalent to 75,000 units) zoned for multifamily use that would have the potential to be developed (2016, p. 11).

Finally, beneficial taxation and low-growth policies incentivize L.A. homeowners to oppose new developments based on the idea that a short supply of housing will bolster the value of their homes, a phenomenon otherwise known as NIMBYism[76] (Lopata, 2018).

As a result, in such a constrained city, only the most aggressive developers are able to build, which leads to a severe discrepancy between residents' needs and realities.

Housing growth is geographically unequal and mainly reflects local booms such as in Downtown, West Hollywood and Koreatown. On the other hand, even if L.A. is on its way to achieve Mayor's Gracetti's goal of delivering 82,000 housing units in eight years (2013-2021), only 10% of them have been affordable (Chiland, 2018).

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[75] In comparison, Paris has a density of 20,781 hab. per km² and London 5,590 hab. per km²

[76] NIMBY stands for Not In My Backyard. This word reflects movements of residents protesting against new developments in their neighborhoods.

As L.A. falls short on affordable housing, fragmented governance and overlapping institutions prevent the development of a global strategy to tackle the issue. The largest county in the country[77] contains 88 cities with their individual city councils[78]. For the City of Los Angeles itself, 15 local districts have the responsibility of local governance and represent their community at the city scale[79]. Helen Campbell, Secretary of the Beverly-Vermont CLT and analyst at the City of Los Angeles Housing and Community Investment Department, illustrates the impact of this governance on the city functioning, saying "*L.A. is such a conundrum, we're so spread out. […] If you think of all the politicians, it makes about 543 people. How do you want to get anything done?*" (personal communication, December 7, 2017).

For CLTs, these governance issues, which restrict the implementation of comprehensive and consistent action plans, are reinforced by a perceived low political will to support them. Helen Campbell[80] brings forth three points that illustrate the situation.

First, she mentions the interest the City has in mobilizing their land assets in order to generate revenues stating: "*There is a lot of land that the City owns that they've been looking at developing into.*" Secondly, CLTs are not yet considered as legitimate housing partners due to the immaturity of the community-led housing sector. She adds, "*from the City perspective, all the CLTs in the city are so new. There is not one CLT they could partner with in order to develop housing for them.*" This lack of legitimacy entails a low willingness from the City side to invest into alternative housing provision scheme, as they are considered risky. Mrs. Campbell concludes by saying, "*Developers have always been able to deliver a certain amount of housing, and that's a visible result. We cannot afford not to have results, to set back and experiment. Because we're so in desperate need for housing, no one has this time to do something else […] we'll be mistrusted until we actually deliver.*"

Furthermore, this lack of cooperation is bolstered by deep historical mistrust, from the CLT side, in regards of public officials. As Oscar Monge, Environmental Planner at T.R.U.S.T. South L.A., illustrates, it all comes back to segregation policies and violent urban regeneration processes. He says, *"the City and the Government have been on the wrong side of history for so long…"* He insists particularly on the issue of race and its impact on the Latino community's right to service provision and access to ownership. He says, "*We know there's some governments out there that say that people of a certain skin cannot own land because of where they come from.*"

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[77] *12 305 km² for 10 million people (United States census Bureau, Population Estimates Program, 2016)*
[78] *The 76 other unincorporated communities are governed by the five-member Board of Supervisor at the County Level. The supervisor representing the area in which the community is located has mayor-like functions over the population.*
[79] *They for example are in charge of running Neighborhood Councils.*
[80] *Secretary of the Beverly-Vermont CLT (BVCLT), and analyst at the City of Los Angeles Housing and Community Investment Department.*

Besides this, the long-lasting City support of the L.A. Community Redevelopment Agency (CRA/LA) had a very negative impact on public opinion. At the time of its operation (1948-2012), the semi-autonomous agency's mission was to promote and facilitate redevelopment of areas suffering from "blight." This agency was criticized for its top-down methods, bypassing residents' voices as they "*whipped out entire neighborhoods*."[81]

As a result of constrained urban development processes, low political support and mistrust from the civil society, synergies between the Municipality and the CLTs are low. Stephen Hill[82] corroborates this point, giving its international perspective from the UK: "*L.A. was the area where I found the least synergies between the CLTs and the authorities*." As CLTs are often dependent on public subsidies (especially concerning land acquisition), a low level of collaboration makes their work more difficult to undertake.

2. The Forces at Stake in Downtown L.A. Urban Revitalization

Downtown L.A. (DTLA) revitalization takes place in this tense and negotiated urban development process where communities, developers, and local authorities confront each other. Understanding the processes at stake in Downtown is, thus, a crucial part of the Los Angeles CLTs' story.
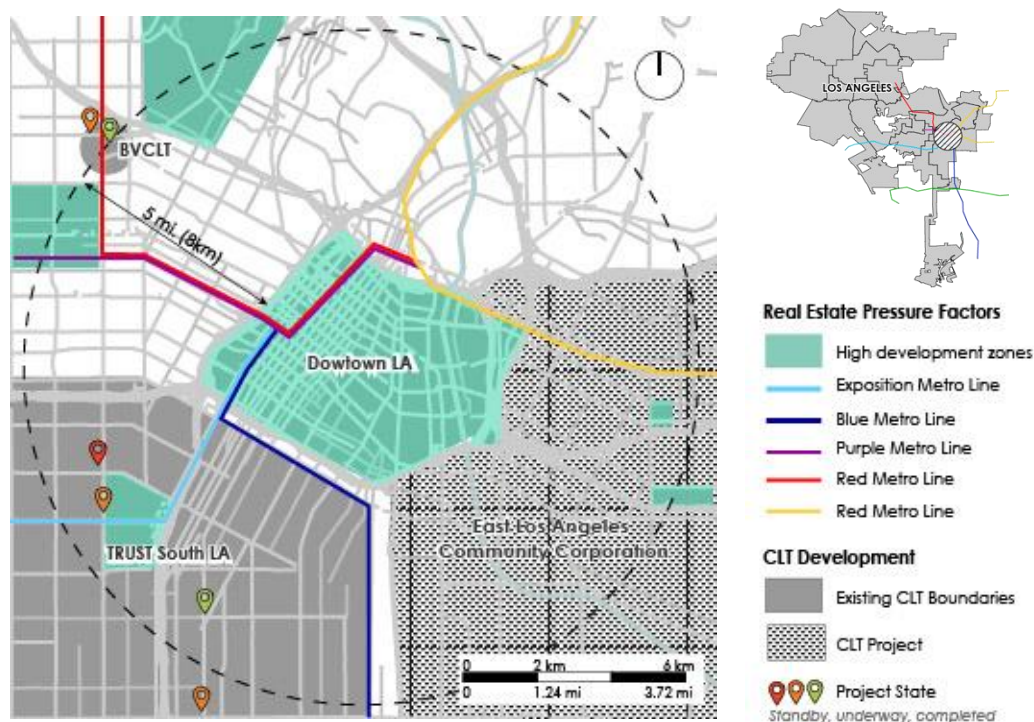
Fig.5. Real Estate Pressures Fostering the Development of CLTs in Downtown L.A.
(Source: Open Street Map, 2018. Plotted by Diane, Pialucha, 2018).

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[81] *Helen Campbell, Secretary of the Beverly-Vermont CLT (BVCLT), and analyst at the City of Los Angeles Housing and Community Investment Department.*
[82] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

As shown by the map above, three major CLTs are being developed within a five-mile radius of the core city center where major transportation lines cross and growth is concentrated.

In the northeast, in the neighborhood of Koreatown, the Los Angeles Eco-Village (LAEV) is implementing a demonstrative environmental project. In the south, T.R.U.S.T. South L.A. (TSLA) and ELACC (East Los Angeles Community Corporation) are both working towards the empowerment of the Latino and African-American communities.

The area of Downtown L.A. was gradually disregarded from the mid-20th Century until the late '90s due to historical and planning constraints.[83] It became one of Los Angeles most violent neighborhoods and suffered from the passive expansion of Skid Row, a 0.4 sq. mile area where approximately 1,800 homeless people now live (Gee, 2017). Consequently, surrounding neighborhoods–such as South Central, or Boyle Heights– distant from the waterfronts and mountains have been progressively invested by disadvantaged African-American and Latino communities.

Since the late '90s the trend has reversed. Today, Downtown L.A. revitalization is often presented as the City's "*largest construction boom in modern times*" (Khouri, 2017). Michael Manville, a UCLA scholar, presents the 1999 Adaptive Reuse Ordinance (ARO) as one of this process' triggering factors. This ordinance allowed the conversion of commercial buildings into housing, lowered fire and earthquake requirements (notably for skyscrapers) and exempted the buildings from minimum parking requirements. Major measures constraining redevelopment had, thus, been overcome (2013, p. 49). The redevelopment pace increased in the 2000s with the establishment of the "*City Center Redevelopment Project*" from the CRA/L.A. (2002) and the adoption of the "*DLTA 2040*" program as the update to two community plans (Central City and Central City North) comprising Downtown L.A. This Community Plan set the ambitious objective of attracting 125,000 people, building 70,000 new housing units and creating 55,000 new jobs within about 20 years, advocating for the Downtown Resurgence ("DTLA 2040," 2019).

Some flagship figures of this resurgence include the cultural reactivation of the "Art District," the construction of a concert hall and several museums and the focus set on the Los Angeles "river," bringing back the narrative of the nature in the city. These municipally-driven urban renewal schemes rippled towards the outskirts of Downtown L.A. where disadvantaged communities had settled. The staff of T.R.U.S.T. South L.A. (TSLA) are currently witnessing these evolutions. Oscar Monge [84] summarizes the evolution, saying, "*Things are changing, names are changing. Downtown L.A. is now called South Downtown L.A. Downtown L.A. is being 'revitalized.*'" Malcolm Harris [85] adds, "*South of Downtown, it's already Downtown. They say like we're gonna 'revitalize', 'reactivate', 'bring life back to Downtown', but in practice those investors are coming, trickling down… It's multi-billion investments we're talking about.*"

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[83] *Notably, within the dense urban fabric of DTLA, new developments wouldn't fit new parking space requirements as established in the 50s.*

[84] *Environmental Planner at T.R.U.S.T. South LA (TSLA).*

[85] *Former director of programs and organizing at T.R.U.S.T. South LA (TSLA).*

Real Estate Pressure Factors
- High development zones
- Exposition Metro Line
- Blue Metro Line
- ○ Metro Station

CLT Assets
- CLT Boundaries
- ♀♀♀ Project State
  Standby, underway, completed
- ✸ Headquaters

Real Estate Pressure Factors
- High development zones
- Line Metro Line
- ○ Metro Station

CLT Assets
- BVCLT Boundaries
- Eco-Village Boundaries
- Project State
  In project, completed
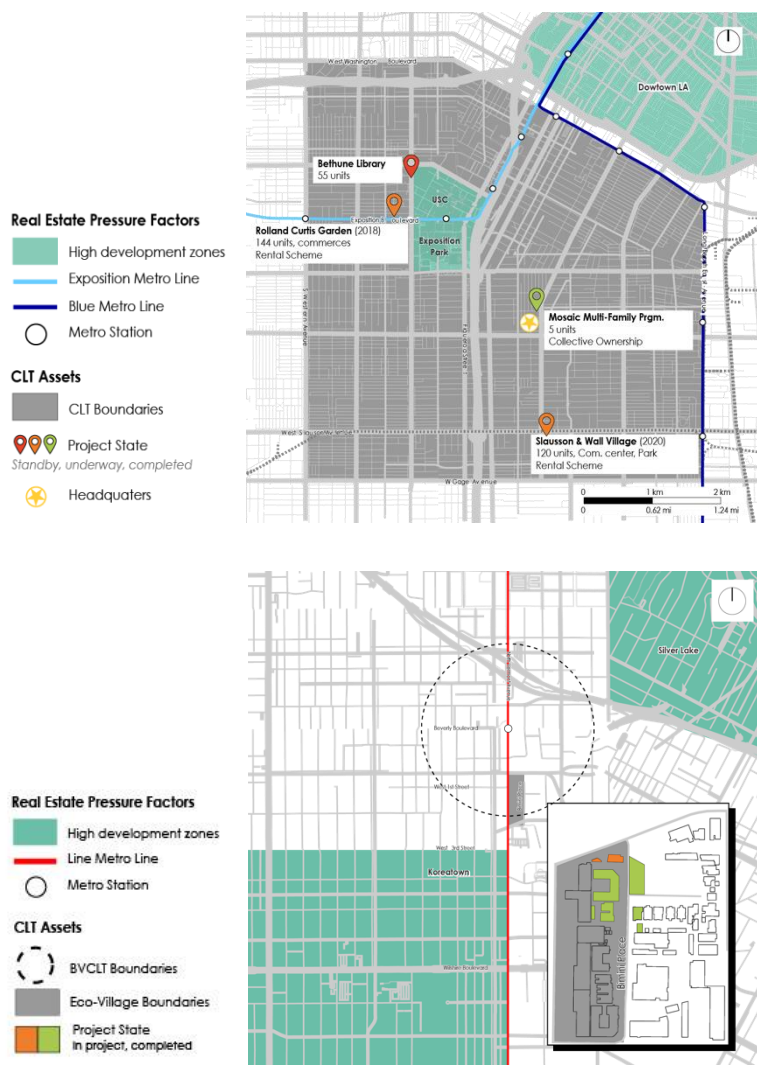
Fig.6. Urban Situation of TSLA and the Eco-Village in Los Angeles (Source: Open Street Map. Plotted by Diane Pialucha, 2018)

Redevelopment pressures are concomitant with transportation development, as all five L.A. metro lines cross at the heart of Downtown L.A. transportation issues bring an additional perspective to the role of public investments in housing price increases. In South-Central L.A., the issue is significant: "*Not saying that all these investments are private. We've been impacted most recently by transit investments, with the Expo line coming through. All those forces that are coming out of the trains … for sure, the real estate prices are gonna go up.*"[86]

Transportation projects are coupled with specific policies to densify the areas around metro stations. TOD policies[87] (Transit Oriented Development)–rebranded from TOC[88] (Transit Oriented Communities)–highlight the close link between gentrification [89] forces and transportation projects. Oscar Monge[90] raises this connection: "*Have you heard of TODs? Metro [91] was forced to think not only of development, but also of the existing communities. They shifted to TOC.*"

As a result, the Downtown boom expands north, east, west and south. Around Downtown, the pressures for T.R.U.S.T. South L.A. (TSLA) are crystallized around Exposition Park, an area comprised of numerous museums (California African-American Museum, National History Museum and California Sciences Center) and the expansion of the University of Southern California (USC) campus. These forces are cited upfront on the CLT website presentation page: "*Higher pressure was put on the land due to the development of the USC campus, the expansion of the Expo line and the*

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[86] *Oscar Monge, Environmental Planner at T.R.U.S.T. South LA (TSLA).*

[87] *TOD is a type of urban development maximizing the amount of amenities within walking distance of transportation hubs.*

[88] *TOC is presented by Metro – L.A. Country Transportation Company - as an approach improving access to transit as a key organizing principle of communities.*

[89] *Gentrification here understood as the renovation and appropriation processes of a given area leading to the relocation of established residents and businesses.*

[90] *Environmental Planner at T.R.U.S.T. South LA (TSLA).*

[91] *LA County transport company.*

expansion of Downtown L.A." (TSLA, 2019). These unbridled developments affect primarily the most disadvantaged communities. Malcolm Harris[92] describes the impacts on the local community: "*Family housings that were affordable, flipped into student housing, USC housing. Houses were being lost. […] We've been born out of the necessity of housing*."

Regarding the Los Angeles Eco-Village (LAEV), the pressures on it have been identified as the mushrooming of Koreatown and the gentrification of neighborhoods such as Silver Lake and Eco Park. These hip areas are recognized for their concentration of coffee shops, food trucks and farmers markets (Brennan, 2012), but this reality nonetheless hides a tremendous price increase. In Silver Lake, the median unit price increased from $630,000 in 2008 to $1,200,000 ten years later, with an 18.4% increase just last year (Zillow, 2018b). A similar trend can be observed in Echo Park where a house was sold in 2018 at a median price of $862,905, representing a 10% increase compared to 2017 (Zillow, 2018c).

3. Disruptive Events Fostering the Need to Organize and Campaign

Resulting from the urban regeneration of Downtown L.A., the equilibrium of surrounding neighborhoods (South Central, Boyle Heights, etc.) is being modified. As megaprojects[93] emerge, contestation rumbles.

While studying the genesis of both T.R.U.S.T. South L.A. (TSLA) and the Los Angeles Eco-Village (LAEV), we observe that these organizations are born out of significant disruptive events. Aligning against local governments and/or developers' projects, residents organized and campaigned to protect their communities. On one hand, TSLA claimed social recognition as well as economic, and environmental justice; on the other hand, through retrofitting[94], the Eco-Village advocated for the development of an alternative urban lifestyle respectful of humans and the environment.

For T.R.U.S.T. South L.A. (TSLA), two major events are worth being mentioned with regard to the genesis of the organization. The first is the decision taken from two Los Angeles developers in 1997 to develop the Staples Center, a 20,000-seat stadium in South L.A. Elected officials supported this project as part of the transformation of a 2.5-mile-long corridor[95] into a sport and entertainment hub (Cummings, 2007). The area, situated at the crossroads of five redevelopment projects, has been shaped by the L.A. Community Redevelopment Agency (CRA/LA) since the '60s.

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[92] *Former Director of programs and organizing at T.R.U.S.T. South LA (TSLA).*
[93] *Megaprojects are here understood multibillion-dollar mega infrastructure projects focusing on their political dimension (Flyvbjerg et al., 2003, pp.1-11).*
[94] *Retrofitting refers here to the act of improving the energy efficiency of a building through low-tech refurbishment (heating systems, insulation fabric etc.).*
[95] *Stretching from Downtown L.A. to the Exposition Park along the Figueroa Street.*

Later in 2005, the implementation of the Figueroa Corridor Improvement District led a group of women to organize around the USC-Jefferson area in response to increasing displacement and disinvestment of poorer households.

With the support of community organizers, legal experts and CLTs pilots (such as the Dudley Street Neighborhood Initiative in Boston, MA) a coalition of residents raised the CLT model as a viable option to concretize the contestation campaign. They, thus, opened the debate towards land ownership and economic justice. The CLT was seen as the visible part of a holistic strategy. The T.R.U.S.T. South L.A. (TSLA) staff recall this emulation period which resulted in the organization of their community into a CLT: "*Folks said: 'as a community we know we need a holistic strategy, we need to keep challenging private developers, and extract benefits from them for our community. […] We have to be affecting policies in terms of redevelopment and raise the housing issue. Ultimately if we want to stay in the community […] then we need to control the land.*" (Sandra McNeil, former Head of T.R.U.S.T. South L.A., personal communication, November 27, 2017). Building on the will of challenging structural issues, they expanded the CLT boundaries from the Figueroa Corridor to the neighborhood area and changed their name to T.R.U.S.T. South L.A., the acronym translating to: "Together we have to reclaim the land.[96]"

A few miles from the Figueroa Corridor, in Koreatown, another kind of social distress drew attention to the necessity of controlling land in the urban core. In the late '90s, CRSP (Cooperative Resources & Services Project[97]), the founding organization of the Eco-Village, was already a well-structured organization; "*When we started all this, we were a 13-year-old organization we had a constituency worldwide–mostly in South California–of about 5000 people,*" explains Lois Arkin, Head of CRSP and one of the Eco-Village founders.

The organization was, at the time, working on an eleven-acre Eco-Village concept in northeast L.A. The project, quite advanced for the time, had already garnered recognition and won an award for advocacy planning.

The initial plan was, however, overturned by the 1992 civil unrest that shook the city that spring. Lois Arkin, a resident of Koreatown, recall major fires and riots in the area. She explains how the Eco-Village project took a completely new direction: "*The CRSP committee–about 20 of us–came together on Monday following the riots. And for the next six months we met regularly, with one question in mind: What should our priorities be in the city of Los Angeles? Should we be building this very sexy, $50-million project that could take us 20 years, or should we talk about retrofitting. And if so, in which neighborhood? Ours.*"

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[96] *Tenemos que Reclamar y Unidos Salvar la Tierra, in Spanish.*
[97] *The Cooperative Resources & Services Project (CRSP) is a resource center for cooperatives providing financial and technical assistance.*

From this point on, the Eco-Village[98] evolved slowly. Helen Campbell[99] details how the organization developed organically: "*At the time the Eco-Village wasn't a proper organization; it didn't incorporate as a non-profit. It was just a group of folks who were committed to a vision.*"

Major shifts took place in 2007 and 2010 with the creation of two new organizations supporting the functioning of the Eco-Village[100]. First, the Beverly-Vermont CLT (BVCLT) was set up in order to manage land assets. Its mandate is to collect ground leases and acquire more properties. Then residents founded a housing co-op: the Urban Soil/Tierra Urbana Limited Equity Housing Co-op (USTU)[101]. USTU acts as a landlord and rents units to co-op members[102] (see. Appendix). The co-op is composed of the residents (or Eco-Villagers) living in the buildings. Throughout the process, the mandate of CRSP (Cooperative Resources & Services Project) narrowed to support and finance the Eco-Village's economic activities.

Through the analysis of the genesis of these two CLTs, we saw that a tense urban context–linked to megaprojects and/or civil unrest–necessitated the grassroots and local communities' need to organize, campaign and enforce community control. In the next subpart, we will analyze the role and strategies they adopted in their respective neighborhoods.

4. The Adoption of Divergent Operational Mode

If T.R.U.S.T. South L.A. (TSLA) and the Eco-Village (LAEV), two grassroots organizations operating at the local scale, are evolving in a similar context[103], they nonetheless adopted two divergent strategies in terms of operation.

On the one hand, T.R.U.S.T. South L.A. (TSLA) made the choice to be embedded in local politics, mobilizing existing housing production instruments, partnering with developers, non-profits and local authorities in order to gain legitimacy as an institution and make its voice better heard. On the other hand, the Eco-Village (LAEV) adopted a more withdrawn position aiming at proving the concept of a self-reliant, sustainable and alternative way or living in urban areas. This way, they express the need of remaining financially autonomous.

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[98] *The Eco-Village is not a legal structure in itself it is composed of inhabitants (Eco-Villagers) that live in the two-block neighborhood and are members of the housing co-op (USTU).*
[99] *Helen Campbell, Secretary of the Beverly-Vermont CLT (BVCLT), and analyst at the City of Los Angeles Housing and Community Investment Department.*
[100] *To which CRSP donated respectively its land and buildings.*
[101] *A housing cooperative is a special type of legal entity which owns estates. Under this scheme each member is a shareholder of the cooperative and thus granted the right to occupy a unit.*
[102] *Each co-op member also has a share in the cooperative.*
[103] *Both being located few miles away from Downtown redevelopments.*

We would argue that the distinct missions, the two organizations are pursuing–in relation with their population target–highly influence their operational modes.

Divergent Missions…

As raised in the T.R.U.S.T. South L.A. genesis, the organization is located at the *"heart of the Black and Brown community*[104]*,"* presents Malcolm Harris[105]. While detailing the features of the CLT members the interviewed staff[106] indeed raised the issue of race as prominent: "*people here don't get the same chances because of their skin color."* It also highlighted the issue of immigration, "*think about how folks living in South Central L.A. might not be documented*," and drug issues: "*there were a lot of drugs use, abuse, happening in the community*." Adding the perspective of income, the CLT work is, in essence, centered on the most vulnerable population.[107]

"Our mission is to **serve as a steward for community-controlled land**; to be a catalyst for values-driven, community serving development; to build awareness and community leadership in issues of housing, transportation and recreation; and to create programs and initiatives that encourage community building and economic opportunity." ("TSLA", 2018).

Relating to the issues facing those populations, TSLA scope of action expands to economic, social and environmental justice. As raised on their website: "*The control of land would give them greater power in decision-making and better economic opportunities*" (TSLA, 2018).

Land control is thus considered as a means to achieve wider interests, for the community as a whole; to "*get at the front of the systemic strucstural issues of capitalism.*[108] " This will is highlighted in their mission statement (adjacent) through the reference to "*community building, economic opportunity, and leadership*." The idea of community empowerment[109] is indeed at the heart of T.R.U.S.T. South L.A.'s (TSLA) mission. As Oscar Monge explicates: "*The CLT is social construct. It's not about one owner, it's about community control."*

"Eco-Village Intentional Community members **demonstrate the processes for creating a healthy neighborhood** ecologically, socially and economically. […] The LA Eco-Village is a demonstration of sustainable community development." ("LAEV," 2018)

The Eco-Village, on its side, share similarities with TSLA on the purpose of controlling land. Lois Arkin, founder of the Eco-Village corroborates: "*The first thing that we needed to do was to buy a property. If you don't have ownership, you don't have any long-term security*."

However, the final end pursued by the Eco-Village (LAEV) is not primarily the empowerment of a disadvantaged community but the development of an intentional community. The Eco-Villager vision is indeed "*to reinvent how to live in the city, to have a higher quality of life, with a lower environmental*

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[104] *Referring to the African-American and Latino communities.*
[105] *Former director of programs and organizing at T.R.U.S.T. South LA (TSLA).*
[106] *Oscar Monge, Malcolm Harris and Sandra McNeil.*
[107] *The members are all legally restricted to people eligible to affordable housing. They also have to live or work within the Land Trust boundaries.*
[108] *Oscar Monge, Environmental Planner at T.R.U.S.T. South LA (TSLA).*
[109] *Here understood as the process of enabling a group of people to increase control over their lives.*

impact.[110]" Even though both CLTs share objectives in terms of social and economic sustainability, the LAEV main goal, as highlighted by Helen Campbell[111] is "*first and foremost environmental sustainability; to incubate an alternate form of cooperative-living in a DIY sort of ethic. They have a very strict mission.*" Consequently, we observe that their membership is quite restricted (100 members). As raised by Lois Arkin, they had to "*make sure that people that become members of our community are not doing that for the cheap rent. The main reason is that you want to specifically be part of our public demonstration project.*"

However, we also raised internal conflicting visions within BVCLT Board members as some would like to see the mandate of the organization to open towards the neighborhood and reach to "*the Spanish-speaking community, Korean, low income...[112]*"

To sum it up, it emerges from this analysis that for both organizations the CLT is a means –and not an end in itself. However, for TSLA the CLT is directed towards the fight against displacement, for LAEV it is mobilized to implement a demonstrative project. The main divergence point observed is their standpoint towards gentrification. When T.R.U.S.T. South L.A. members are direct victims of it, Eco-Villagers are trying not to reinforce it[113].

… and Their Impact on Operational Features

In parallel, we observe that a link exists between missions and CLT structuring (governance, scope, operation). Divergences observed in missions pursued are leading to divergences on how the two CLTs are run.

For T.R.U.S.T. South L.A., staying close to their member's needs is a priority: it is very "*important to understand the depth of all the issues that members are facing. Staying grounded is one of the biggest priorities*," says Oscar Monge[114].

The attention brought to community empowerment transpires in their will of involving members in decision-making and CLT daily operation. Firstly, the tripartite governance[115] within the Board is respected, and the voice of CLT members is made heard through four monthly Neighbors Organizing Committee (NOCs). In addition, residents are involved all along projects delivery through participatory methods as Sandra McNeil[116] explains," *TSLA activities are drawn around people's experiences. A part of the process of this*

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[110] *Head of CRSP and one of the founders of the Eco-Village.*
[111] *Secretary of the Beverly-Vermont CLT and analyst at the City of Los Angeles Housing and Community Investment Department.*
[112] *Helen Campbell, Secretary of the Beverly-Vermont CLT (BVCLT), and analyst at the City of Los Angeles Housing and Community Investment Department.*
[113] *Lois Arkin says: "We want to make the neighborhood nicer but keep the value, we can't make it too nice, we leave gratifies on the wall" (November 24).*
[114] *Environmental Planner at T.R.U.S.T. South L.A.*
[115] *As defined in the classical CLT model the board members are equally chosen between public authorities' representative, CLT residents, and CLT members or neighbors.*
[116] *Former Head of T.R.U.S.T. South L.A.*

organization is about participatory research." Finally, the organization itself is partly run through members' volunteering. Indeed, members have to give few hours of their time to the organization every month (known as "*el trabajito*," in Spanish) in addition to an annual $25-member fee. This mechanism enables to mobilize about 5-10 people a week.

The importance given to community control and empowerment can also be illustrated through an analysis of the CLT scope. Indeed, as raised by the former Head of T.R.U.S.T. South L.A., population target, scope and governance issues are directly linked. She explains:" *The boundaries need to be large enough so that you'll be able to do acquisitions. At the same time, the larger you are, the more you dilute the potential for community control.*" As a matter of fact, TSLA boundaries reflect the existing local community of South-Central L.A. [117] but also fit the CLT strategy and democratic governance perspectives. The territorial focus indeed justifies a small membership size (70-100 members). The "*membership is small enough so that decisions on the organization' functioning are taken by members*," explains Sandra McNeil.

Consequently, in order to serve their population target and stay grounded, TSLA chose to operate within the "*normal affordable housing development system*." They are partnering with housing developers [118] (such as Abode Community) and intend at delivering rental housing at "*30-60% AMI[119], for households earning between $25,000 to $50,000 a year. [Their] developers can take section 8 subsidies.[120]*"

Throughout the process TSLA is relying on a coalition of different non-profits, public and private bodies in order to deliver their units, carry advocacy and capacity building work. As raised by Oscar Monge[121]: "*Our work honestly wouldn't be a success if we didn't have partnerships with other organizations that are doing work around, climate justice, suitability.*"

In that regard, the role of public authorities is ambivalent. On the one hand, public funding seems to be necessary, Oscar Monge adds: "*We're constantly looking for property, applying for grants from Metro [122], public grants and investments, Statewide and countywide.*" And their work on policy advocacy is crucial: "*that's where policy advocacy comes into play because we had to also advocate for policies that are going to direct money to equity focused projects or on our programs.[123]*"

But paradoxically, Sandra McNeil also raises a lack of public support insisting through the fact that they "*ended up using community benefit agreement[124] as a strategy because*

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[117] *TSLA boundaries are defined by major transportation axes (Washington Boulevard, Western Ave., Long Beach Ave., and Cage Ave.) and over two districts (District 9, and District 8).*
[118] *Developers are carrying the building phase then retrofit the land to the CLT through a ground lease.*
[119] *Average Median Income (AMI) percentage defines the income ceiling of beneficiaries.*
[120] *Voucher scheme providing individual allowance for low-income renters in the private sector.*
[121] *Environmental Planner at T.R.U.S.T. South LA (TSLA).*
[122] *L.A. Country Transportation Company*
[123] *Oscar Monge, Environmental Planner at T.R.U.S.T. South LA (TSLA).*
[124] *Contract signed between community groups and a real estate developer requiring him to provide specific amenities (such as affordable housing) as part of new developments.*

[they] couldn't rely on public policy." She also emphasizes on the determining role of philanthropy: "*We have different sources of equity and land acquisition processes depending on the context and the level of public support. We raised social capital from philanthropic and private partners. They give us leverage*."

Similarly, we observe that the Eco-Village's vision drove its operation along the years. It shifted from an organization open towards the neighborhood to a more autonomous functioning as it refocused around the development of the intentional community.

In the 1990s the Eco-Village work was indeed being very much turned towards the local political and social life. Lois Arkin[125] recalls: "*The first three years, all of our work was in the neighborhood […] we campaigned against eviction across the street*." She also acknowledges a turnaround: "*we became much more inward as we bought properties, as we were growing our own intentional community, and dealing with our own issues*." As of today, the Eco-Village seems to be more withdrawn as neighbors didn't necessarily incorporate into the intentional community. As of today, "*half of the people who live on the block have no idea they live in a place called an Eco-Village, unless they Google their street*" (Lois Arkin, personal communication, November 24, 2017).

This withdrawing towards a more autonomous life can be illustrated through several features: a more constrained membership process, a limited geographical scope, and the development of specific organizational as well as financial tools to sustain the operation of the Eco-Village.
Getting in the intentional community is now indeed the result of a six-month membership process. Building on past mistakes, founders express as a priority the need to ensure a shared ecological vision among members. "*Unfortunately, the longer an intentional community exists, the tighter its entry doors become*" corroborates Lois Arkin.
The intentional community is today composed of 37 Eco-Villagers, members of the USTU co-op. In this community, a special attention is paid to get a balance in terms of income, ethnicity, genders, household composition, etc.
The Eco-Village is governed democratically through the USTU[126] and BVCLT[127] bodies. Members of the USTU cooperative (the Eco-Villagers) meet weekly and set specific working groups to manage daily issues and improve the Eco-Village. BVCLT, for its part, is regulated via a tripartite governance in which CRPS[128] –as the Eco-Village financial arm– possess a significant voice (see. appendices for more details).

Indeed, the role of CRPS in financing and developing of the Eco-Village has been preeminent. In order to acquire properties and ensure its financial independence CRPS

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[125] *Head of CRSP and one of the founders of the Eco-Village.*
[126] *Urban Soil/Tierra Urbana Limited Equity Housing Co-op (USTU)*
[127] *Berverly Vermont Community Land Trust*
[128] *The Cooperative Resources & Services Project (CRSP) is a resource center for cooperatives providing financial and technical assistance. It is the founding organization of the Eco-Village.*

implemented an Ecological Revolving Fund[129] capitalized by supporters. Other incomes are generated through the collection of affordable rents[130] and commercial activities. The Eco-Village indeed enabled to start up a variety of activities (e.g. The Bike Kitchen, The Food Lobby, Cafecito Organico, Time Bank, etc.). Most recently, based this autonomous financing scheme LAEV will be acquiring a garage to be converted in a multi-activity site. Every property acquired is rehabilitated–or retrofitted–by the Eco-Villagers themselves using environmentally friendly techniques and materials (e.g. grey water systems, etc.)

Helen Campbell [131] compares the operating modes between the Eco-Village and T.R.U.S.T. South L.A.: "*Affordable Developers in the US use Tax Credit[132] [LIHTC], I guess Abode Community[133] worked with Tax Credit. But BVCLT [Beverly Vermont Community Land Trust] don't. We got lands through donations it's DIY […] T.R.U.S.T. South L.A., they definitely used grants to fund their organization. […] I don't know how much they raised over the years but it must have been millions of dollars. For BVCLT, we want to be independent, and economically sustainable. We don't get government grants, no subsidies at all.[134]*"

In conclusion, we could add that the scope of the Eco-Village, as well as its land acquisition strategy reflect this a will of autonomy. TSLA is operating at the neighborhood scale. It has drawn its boundaries between major transportation axes with the objective of acquiring more land possible. In comparison, LAEV is expanding more cautiously preserving land continuity (see. appendices). The question remains as to whether its scope will effectively be broadened to a one-mile radius from the Beverly/Vermont train station - as depicted in its status - or remain conscript across two blocks.

5. Conclusion

After having analyzed national contexts in the first chapter of this dissertation, we drew a picture of the US CLT model as a local institution created, refined and disseminated by grassroots activists in order to fill a service gap[135] most disadvantaged communities were suffering from in urban areas.

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[129] *A revolving fund is a fund remaining available to finance an organization's continuing operations. The money used for a first investment is then directly repaid to replenish the fund, and so on.*
[130] *Giving an order of magnitude we know that, "single units at the end of the block are going for, $950-1000 per month. We're half of the market rate rents." (Lois Arkin, personal communication, November 24).*
[131] *Secretary of the Beverly-Vermont CLT (BVCLT), and analyst at the City of Los Angeles Housing and Community Investment Department.*
[132] *LIHTC is a US program supporting investment in affordable housing through the provision of a dollar-for-dollar tax credit to investors.*
[133] *Affordable Housing Developer partnering with T.R.U.S.T. South LA.*
[134] *BVCLT nonetheless benefited from a small loan from the Community Redevelopment Agency (CRA/LA) to purchase a fourplex in 2009.*
[135] *Notably housing.*

Detailing the specific context of Downtown L.A., we shed light on the urban renewal processes at stake, their impacts on surroundings communities and how they fostered the implementation of CLTs. Facing fragmented political support and low financial resources, communities in those areas have expressed the need to enforce community control through CLTs. As a result, we observed that they remained very much grassrooted, fighting or limiting gentrification through bottom-up practices and campaigning. They are indeed focused on a tight membership (approx. 100 members) and operate at the very local scale (few blocks).

However, despite those similarities driven by the local context, we observe the adoption of divergent implementation strategies. On one hand, T.R.U.S.T. South L.A.'s missions and structuring are highly influenced by the local context. Building partnerships, they are embedded in local politics, make use of existing housing provisions schemes (e.g. Low-Income Housing Tax Credit, LIHTC), and mobilize legal remedies (e.g. Community Benefit agreement) in order to pursue their goals.

The Eco-Village, for its part, is more withdrawn from the local political scene. It is focused on the implementation of a demonstrative project. Its functioning is autonomous, based on specific tools they developed (revolving funds, land trust, cooperatives, economic activities…) to support this project.

Analyzing individual missions of both T.R.U.S.T. South L.A. and the Eco-Village, we highlighted that their operational features are highly influenced by the population target. T.R.U.S.T. South L.A. is aiming at empowering disadvantaged African-American and Latino communities of South Central L.A. This vision leads the organization to implement low-income rental housing and broaden their activities to tackle systemic issues such as transportation, social justice, etc.

On the other hand, the Eco-Village pursues the goal of developing a homogenous intentional community to demonstrate environmental sustainability; which led to self-help practices.

In a nutshell, divergences in missions between TSLA and LAEV impact the structuring (scope, governance, operation) of both CLTs, most significantly regarding their operational mode.

LONDON
A Negotiation for the Provision of Affordable Housing

1. CLTs Rise in Response to the Greater London Housing Crisis

Compared to Los Angeles, in London, the role played by local authorities in the implementation of Community Land Trusts on their territory is much more significant. This observation can be partly explained referring back to the conceptual framework and the successive national reforms [136] delegating neighborhood development powers to local levels. Stephan Hill [137] recalls this period, in the early 2000s, where "*government was wanting to devolve the most possible things to local authorities*" (personal communication, February 2, 2018).

This process of devolution can, for instance, be examined through the analysis of the fourth London metropolization[138] phase at stake since the late '90s. Inspired by New York governance, the Greater London Authority (GLA) took shape in 2000 and aimed to address the organizational deficit of the British capital and strengthen its status as a global city (Bacik et al., 2015, p. 18).

Based on historical schemes, the Metropolis is governed via a two-level structure. The first sphere of governance, the Greater London Authority (GLA), formulates the strategic vision for the city. Simultaneously, 32 local boroughs are in charge of managing and delivering public services (p. 36). The relationship between these two entities is under constant negotiations (p. 44).

Local boroughs have been successively more financially constrained since the implementation of the "Big Society[139]" ideological renewal under the mandate of David Cameron (2010-2016) or again the 2012 debt crisis. Thorough this period, public spending rationalization led to a 20-30% budget cut in some boroughs[140] (p. 32). At the

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[136] *e.g. Local Government Act, 1992 and National Strategy for Neighborhood Renewal, 2001, Localism Act, 2011.*

[137] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

[138] *Understood here as the process of political and economic capacity reinforcement of a city in regards of regional and national dynamics. Even though between 1885 and 2000 several metropolitan entities alternated (three), we will indeed focus on the last project supported by the Labour party in 1999.*

[139] *This political ideology consists in making the civil society (communities, associations, charitable or religious organizations, families, businesses …,), along with the public sphere, contribute to public service costs.*

[140] *It has to be highlighted that national endowment can represent up to ¾ of local authority resources.*

same time, the GLA has been continuously extending its operation fields since its creation, sometimes overlapping with local competencies. For instance, new skills in terms of housing and urban development have been transferred to the GLA, successively, in 2007 and 2011, through the GLA Act, and the Localism Act[141].

Schematically, the production of affordable housing in the city is now concentrated in the hands of a triumvirate; the GLA gives strategic orientation for the development of new houses, the boroughs are charge of enforcing quotas[142] and managing their remaining estates[143] and finally, private developers or Housing Associations are incentivized to deliver the units.

However, over the past 20 years, this functioning has hardly succeeded in implementing successful affordable housing policies at the city scale. Similarly to Los Angeles, London has experienced high demographic growth over the past decades due to economic concentration[144], but the housing offer remains structurally insufficient. As presented in the introduction, this situation, among other parameters, led to higher pressure on the housing market and affordability deterioration[145].

This phenomenon is reinforced by political barriers at the national and local scale impeding the production of genuinely affordable homes.
For instance, this point can be illustrated by a shift from "social" to "affordable" housing production in the country (2010). While local councils used to directly produce rental housing at 35% of the market rate in the '80s, current national policies now favor the production "affordable" homes to be sold at 80% of the open market. These homes are to be delivered by the private market (private developers or not-for-profit Housing Associations) in returns of subsidies (pp. 54-55). However, the housing market being so tight in London, "affordable" homes are already too expensive for the middle class.

In addition, the effects of national policies are bolstered by local political constraints. As mentioned briefly in the conceptual framework, decision makers present difficulties in maintaining the pro-affordable housing position. Stephen Hill [146] clarifies: "*Local authorities have statutory duties in relation to housing […] The problem is, lots of them don't have an adopted plan. Lots of places simply don't want new housing. Politician*

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[141] *The GLA now possesses three levers for action on this matter: strategically it defines construction objectives at borough levels through the London Plan, it can support new development through the provision of land or finance, and then has the capacity of taking over building permits on strategic sites (p. 57).*
[142] *In order to enforce the London Plan, the borough has the ability to implement local plans, housing strategies and deliver building permits (p.65).*
[143] *The core of Council Housing having been transferred to Housing Associations or sold to their renters since the late 80s.*
[144] *As an illustration, we note that about 36% of London's population is born in a foreign country (Bacik et al., 2015, p. 55).*
[145] *As a reminder, housing prices increased by 67% in 10 years in London (ONS, 2018)*
[146] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

leaders are frightened to commit themselves to housing growth. If they do that, they would be voted out."

In reaction, the Mayor of London Sadiq Khan (2016-present), has identified the current housing crisis as the main barrier to the city's prosperity and has committed to provide genuinely affordable housing and protect that which already exists (Greater London Authority, 2018a, p. 2).

In this tense political context, where the affordable housing supply is lacking, CLTs are spreading across the city. As shown by the adjacent map, about 20 projects are currently ongoing or completed in eleven boroughs.

Similarly to Los Angeles, we observe that these projects are responsive to local housing prices and tend to concentrate in the inner boroughs.

The borough, as the operational component of the metropolitan entity, emerges as the proper scale to analyze the CLT movement in London.

In the next subpart, we will most specifically focus on Lewisham in southeast London.

Fig.7. CLT Development in London in Regards of the Housing Crisis (Source: London DataBase 2016. Plotted by Diane Pialucha 2018).

2. Lewisham Borough, a Fertile Ground for Community Led Housing

Lewisham is located west of Southwark where massive urban renewal took place (see. the Shard building, Elephant & Castle redevelopment, etc.) and south of Tower Hamlets which hosted the 2012 Olympic Park. Lewisham, drawing less attention, is nonetheless one of the areas in London where the population is growing the fastest[147] (Lewisham Council 2014, p. 5). In parallel, property prices are steadying rising. Even though a discrepancy exists between the north and the south of the borough, average monthly rents on the open market were estimated at £1,314 per unit and average sale prices at about £475,142 in 2017 ("London Data Store," 2017). The Lewisham Mayor Cabinet deplores a situation where "*a combination of historical and ongoing lack of new supply, welfare reform and rising property prices and rents has led to rapidly increasing demand in all tenures*" (Lewisham Council, 2017).

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[147] *Between 2011 and 2021, the population is estimated to grow by 36,000 persons (London Data Store, Population by Borough 1939-2039,2015).*

Facing this situation, the Council nonetheless aims to implement proactive housing policies. The current London Plan (2017) has set a production of 1,385 units per year at the borough level. The 2018 monitoring document teaches us that the Borough overreached this target by 149%[148] in 2016-2017 (Greater London Authority, 2018b, p. 23). As Stephen Hill149 illustrates: "*They've been able to show that they are building new homes, that the quality of the homes was good.*" However, this reality hides that, over the same period, only 292 homes produced (18%) were affordable[150] ("London Data Store," 2019). This feature highlights the difficulty for the Borough to combine the objectives of producing new housing and securing affordability[151].

In that context, the Borough demonstrates exemplarity regarding the support brought to Community Led Housing[152] (CLH), and especially to CLT development. The Borough became a favorable political environment for the development of resident-led development scheme for several reasons.

To start with, the Borough's internal governance emerges as a triggering factor. The Borough is governed by a directly elected Mayor as opposed to Collegial Councils, as is the case in the majority of London boroughs[153]. This process favors direct democracy and enables citizens to get a direct entry point to local policies. Stephen Hill [154] summarizes: *"If you want to get anything done in Lewisham, you lobby the Mayor."*

Besides organizational aspects, the Borough has historically nurtured a partnership-based approach to alternative housing actors (such as CLTs and housing co-ops, etc.). Stephen Hill illustrates: *"Their relation is not about fighting but partnering […] It worked, people are getting out of the waiting list."* In that vein, they sold *"600 homes to a community-owned housing association–Phoenix Community Homes."* As part of a mixed-market approach to deliver new homes, they developed a specific platform for dialogue dedicated to Community-Led Housing. This will is reflected in the Borough

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[148] *Throughout this period 62% of the 32 Borough overreach their target. Objectives for Lewisham are to be increased by about 300 more homes in the New London Plan (GLA, Draft New London Plan, 2018).*

[149] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

[150] *Affordable housing referring to the sum of social rent, affordable rent, intermediate rent and low-cost home ownership.*

[151] *Reinitiating the production of Council Housing-on hold for 30 years- for example is one of the measures taken to reverse perverse these effects. Lewisham Borough has set the objective of 500 homes to be built between 2015 and 2020. (Lewisham Council, 2014, p. 13).*

[152] *Community Led Housing is the movement gathering all sorts of community led models (CLTS, housing co-ops etc.)*

[153] *We can find directly elected mayors in Hackney, Lewisham, Newham, and Tower Hamlets. Apart from the City of London, all other Borough are governed under a collegial model known as the "leader and cabinet model."*

[154] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

2015-2020 Housing Strategy[155]. In that process they committed to "*putting local groups in the driving seat*" and helping them "*to maximize [their] ability to deliver well-defined and affordable new homes for Lewisham*" (p. 11).

This partnership-based approach relates back to historical experiments undertaken in the '80s.
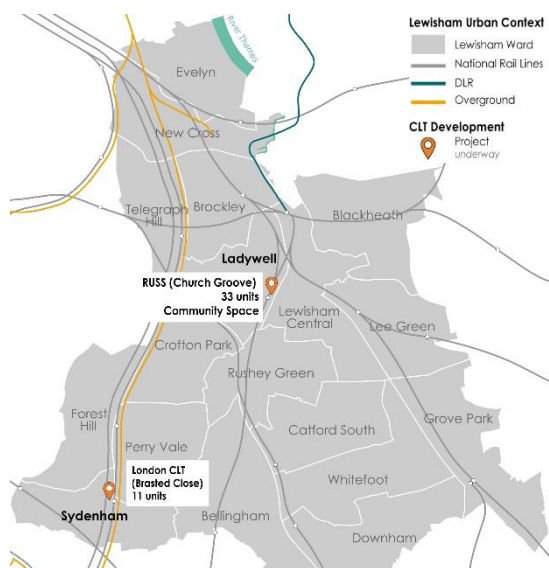
Fig.8. The Two CLT Projects in Lewisham
(Source: OpenStreetMap, Plotted by Diane Pialucha,2018)

One notorious example of this anchorage is the project realized by Walter Segal – a self-built movement advocate and architect – which aimed to redevelop tricky council sites[156] in order to provide self-built low-cost housing. The concept was that residents would design the layout of their homes according to their needs and lifestyle and build them out in order to develop affordable and flexible homes (see. Appendix). Those homes, considered a great success in the neighborhood, left a strong heritage of self-built housing as a viable option for affordable housing development. Stephen Hill [157] highlights that RUSS (Rural Urban Synthesis Society), one of the CLT case studies, "*engaged with the Council based on that story".[158]* One can read on their website that "*RUSS is building on this legacy replicating and updating the model for the 21st century.*" ("RUSS," 2019).

Subsequently, in 2014, Sir Steve Bullock, then-candidate for Mayor of Lewisham, committed to supporting two Community Land Trusts (RUSS and London CLT) in the borough in order to deliver 50 affordable homes for local people being priced out of the open market. Once elected, he reaffirmed: The "*council is to meet its statutory obligations, officers are pursuing a wide range of new housing development approaches in order to meet the demand. One such approach is working with Community Land Trusts*" (Lewisham Council, 2017).

In 2014, RUSS was allocated a site to develop 33 affordable homes through the Church Grove project in Ladywell (under construction since early 2019). London CLT was successful in getting a council garage site previously marked for council-led infill development in order to develop 11 homes in Brasted Close (Housing Commission, n.d.).

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[155] *"Community self-build projects and housing cooperatives also support the delivery of new affordable housing to meet housing needs. Lewisham Council pioneered self-build in the 1980s, and are now looking at new opportunities for community-led development." (p. 11)*
[156] *Small sites, sites prone to floods, polluted sites etc.*
[157] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*
[158] *It can be raised that RUSS funder, M. Karim Dayes, is one of these pioneers' son.*

Through these two political moves, and the provision of two sites, we observe that CLTs in Lewisham are in the process of being legitimized as institutional partners, as part of the mixed-market approach developed by the Borough.

3. CLTS as Enablers of Local Democracy

For these two CLTs, getting legitimized notably implied the recognition of their added value as an anti-speculative scheme fostering the involvement of residents and ultimately local democracy. We will see how of both London CLT and RUSS (Rural and Urban Synthesis Society) are pursuing this goal, complying with the vision of British CLTs as presented in the conceptual framework – localized institutions under resident control. Both CLTs are pushing residents to fill a vacuum in local democratic activities. As Stephen Hill[159] illustrates: "*CLTs enable people to feel like they participate in some kind of local political life. […] Members are actually doing things, it's a political act, and this is about local governance.*"

Increasing CLTs' Outreach at the City Scale

First, analyzing both CLTs' scope, membership and governance we observe that, contrarily to the CLTs studied in Los Angeles (T.R.U.S.T. South L.A. and the Eco-Village), RUSS and London CLT adopted a more universalist approach. They aim to reach as many citizens as possible through an open membership organization.

In order to expand their outreach, both CLTs have open membership to all Londoners. They both adopted a Community Benefit Society legal status. This cooperative structure enables any member to engage in the organization by buying a £1 share. As a result, the CLTs studied in London have ten times more members (800 for RUSS, over 2,500 for London CLT) than T.R.U.S.T. South L.A. or the Los Angeles Eco-Village which total about 100 members each.

In order to get this significant membership organized, the London CLT adopted a deconcentrated governance acting as an umbrella organization and providing technical support and expertise to local communities on site.
RUSS nurtures the similar ambition of replicating its model via capacity transfer. RUSS started in the fertile ground of Lewisham in order to prove their concept through a pilot project (Church Groove), but their final aim is to "*support other community organizations who want to progress similar developments*" (RUSS, n.d.-a p. 5). In order to replicate the self-building model, it developed the School of Community-Led Housing in 2016 providing training for individuals and groups.

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[159] *Pioneer in the development of CLTs in the UK, Trustee of the National CLT Network (UK) and Head of C2O futureplanner.*

Implementing Lobbying Strategies

Secondly, similarly to T.R.U.S.T. South L.A. (TSLA) and the Los Angeles Eco-Village (LAEV), London CLT and RUSS adopted campaigning and lobbying as fundamental strategies to pressure local authorities.

We notably find similar disruptive events[160] at the heart of London CLT's genesis. The 2012 London Olympic Park megaproject compelled citizens to organize in order to get their share out of the project's outgrowth. Campaigning started in 2004 when Citizens UK – a community organizing group – secured the promise of a CLT as part of the Olympics' legacy. In that process, the Greater London Authority (GLA) required the implementation of a pilot scheme proving the concept beforehand.

By 2009-2010, Citizens UK had created the East London CLT (which later became London CLT) and targeted a former hospital, St Clement's, in Tower Hamlets as a potential site. Although East London CLT lost the initial bid, they nonetheless managed to pressure the GLA to partner with the successful developer (Linden Homes). Thanks to the stir caused by their campaign, they secured the development of 23 CLT homes out of the 252-total scheme. Dave Smith, former Head of London CLT corroborates, stating that *"[the GLA] wouldn't have done it if it wasn't for the campaign."*

A similar strategy, which has now become London CLT trademark, was implemented in 2014 during local elections. It was during this period that East London CLT started expanding through a new campaign in Lewisham. The local community – led by Citizens UK, Lewisham – managed to get the candidate, Sir Steve Bullock, to commit to the creation of a CLT in their Borough. By 2016, the Lewisham site (council garage) was approved and the Mayor agreed to work "*with the London CLT and Lewisham Citizens for a period of twelve months to develop a fully affordable housing scheme for the site*" (Lewisham Council, 2017). By the end of 2018, St Clement's Hospital project was delivered, the project in Lewisham got planning permission and similar initiatives mushroomed in Newham, Southwark and Lambeth.

Community organizing and campaigning was thus crucial in putting London CLT at the top of the metropolitan political agenda throughout this process.

As for RUSS, despite being less professionalized, they also adopted a similar lobbying strategy to gain recognition. It started in 2015 through a member-led campaign which enabled them to successfully bid for an EU-compliant public procurement process designed by the Lewisham Council towards Community Led Housing ("RUSS," 2019). This competitive dialogue process led to the signature of a joint development agreement securing a "*community-led, affordable, self-build housing development in Ladywell*" in 2016 (Housing Commission, n.d.).

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[160] *Both CTL studies in the Los Angeles case study have been initiated by disruptive events such as the construction of a new stadium or violent civil unrest.*

In summary, we observe that both CLTs, as community-organizing bodies, put pressure on local authorities and mobilize existing legal resources in order to develop community-led homes (e.g. section 106 agreement161, call for projects, etc.).

Stephen Hill, building bridges between UK and US CLTs, concludes: "*The success they had is linked to their capacity to exercise some level of lobbying on local authorities and partners with some affordable housing developers. London CLT wouldn't have achieved anything if they wouldn't have grown out of community organizing. Their ability to get leverage on mayors and councils for their operation is both very important.*"

Securing Political Support: a Win-Win Situation

Getting leverage from local authorities is crucial for CLT development in London. They heavily rely on public support to access land during the preliminary phases. The Greater Authorities (GLA) and local boroughs are the two major bodies[162] supporting CLTs in the city. Illustrating this point, the GLA mobilized land from its transportation company (Transport for London) through its *Small Sites, Small Builders Program* favoring small, developers[163] (including community-led ones). In addition, the Mayor committed to investing £3.8 million as part of the *London Community Housing Fund* for start-up and predevelopment works over the next years ('SHICC', 2019).

In parallel, local councils are supporting the sector through access to finance, capacity building and land disposal processes (Housing Commission, n.d.).

In Lewisham specifically, London CLT and RUSS joined forces with the Borough in order to develop plans, access land and secure GLA funding. Most significantly, they managed to get both sites allocated at a symbolic rent of £1.

However, it must be noted that in both cases, these were difficult sites to develop. Notably, Church Groove (RUSS) had "*access, flood risk and contamination problems*". For London CLT, the site "*probably had a negative value; it was a tricky site, a garage*" (Stephen Hill, personal communication, February 27, 2018).

This fact echoes the conceptual framework in introduction of this dissertation. It has been shown that for local authorities, Community-Led Housing (CLH), more specifically Community Land Trusts (CLTs) could be a means to both support pro-affordable housing positions and enforce their quotas. In that regard, the backing brought by local councils such as Lewisham to CLTs could be presented as a win-win situation.

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[161] Section 106 agreements (Town and Country Planning Act, 1990) are signed between a local authority and a developer and relate to planning obligations. It for example enables a local authority to secure specific contributions to a development such as affordable housing. They are similar to the Community Agreement used by T.R.U.S.T. South L.A. in Los Angeles (US).
[162] Along with the National Health Service (NHS) (e.g. maybe provisioning land for the St Ann's Redevelopment Trust (StART) pilot project).
[163] In 2018, London CLT has been successfully bidding for building on sites at Cable Street (Tower of Hamlets) and Christchurch Road (Lambeth). 75 homes in total.

In the case of RUSS, it has been highlighted that one triggering factor enabling the CLT to win the bid was the fact that their proposal tripled the number of units built on the plot (33 units[164] instead of 10 for a traditional developer). They, thus, have been "*aiding the Council in meeting the Borough's housing needs*" ("RUSS," 2019).

Stephen Hill[165] summarizes this collaboration: "*[Lewisham Borough] was quite happy for a community to engage time and effort to do this job. Politically they are really keen. […] It helped politicians to champion the idea.*"

Ensuring Resident Control

We, thus, saw how both CLTs adopted a citywide vision, implementing an open membership and employing similar lobbying strategies in order to get legitimized. However, as exemplified by our Los Angeles case study, the larger a CLT is, the more the potential for community control is diluted (Sandra McNeil, personal communication, November 24, 2017). The two CLTs, therefore, pay special attention to maintaining residents' control despite their wide scope. Resident control in both organizations, is however taking different shape in their organizational feature. For London CLTs, it is expressed at the earliest stages (campaigning, co-designing, etc.), for RUSS, on the other hand, it is more significant during the building phase (self-building approach).

As mentioned in the previous section, London CLT became an umbrella organization relying on organized communities - such as churches, schools and charities - in partnership with Citizens UK. A community organizer is appointed by Citizens UK at the borough level. The organizer plays an essential role in bringing out the housing issue and pushing for the creation of CLTs at a local level. The objective is to foster "social hubs" and pull away from a historically paternalistic housing provision scheme (Liana Etkind, personal communication, February 26, 2018). Under this scheme, residents gain ownership of the project, engaging time, efforts and financial resources.

For instance, the payment of dues to finance the community organizer work illustrates our point. Lianna Etkind[166] insists on the importance of this participation: "*without people putting money on the table, all that becomes a bit paternalistic. […] You're the one paying for the organizing, you're the one making the decisions.*" London CLT also mobilizes citizens' finances through Community Share Issuing (over £450,000 collected in 2016).

In parallel, members also play an essential role in the actions plans by "*knocking on the doors of a neighbor to make sure they know what's going on […] leading lobbying campaign during local elections […] and being involved on the design side too.*[167]"

Finally, members are involved in the decision-making processes at the city scale. London CLT chose to adopt a tripartite governance[168.] Dave Smith[169] explains: "*Few CLTs in the*

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[164] *Five social rent nominated by the Council and 28 units under shared equity or shared ownership.*
[165] *Head of C2O futureplanners and pioneer in development of CLTs in the UK.*
[166] *London CLT campaign manager.*
[167] *Lianna Etkind, London CLT campaign manager.*
[168] *Public authorities, residents, members are equality represented in the CLT Board.*
[169] *Dave Smith, Former Head of London CLT.*

UK are having the tripartite governance. We are doing that because we believe in the US heritage model." London CLT, partnering with Citizens UK and local officials, hence managed to expand its housing activities across London. Democratic governance and residents' involvement remains a constant challenge.

RUSS, for its part, enables resident control on the development process on through several means. First of all, RUSS, despite not having kept the classic tripartite governance, is "*powered and directed by its members*" and thus remains centered around its members (RUSS, n.d.-a, pp. 27-30.). It also engages members via campaigning and co-design workshops (similarly to London CLT), and more specifically through the engagement of residents in self-building training. As mentioned earlier, RUSS is inscribed in a long-existing world movement of self-builders and took the opportunity of CLT development in the UK to reinvent this practice.

Notably, this functioning enables them to reduce the cost of housing through self-build labour (or otherwise called "sweat equity") and enforce capacity building. Through self-finishing, residents are able to earn up to 20% of the home price. For instance, on the Church Groove pilot project, self-build labour represented £1 out of the £6.2m scheme (Housing Commission, n.d.).

4. Adopting Different Approaches Towards Solving the Housing Issue

In the Los Angeles case study, we observed that T.R.U.S.T. South L.A.'s and the Eco-Village's strategies were driven by urban context, but most importantly by their individual missions[170] which eventually led them to pursue different operational modes.

In London, we observe that RUSS' and London CLT's strategies to get on site are pretty similar: lobbying local authorities through campaigning in order to get legitimized as viable partners for housing provision. As enablers of local democracy, they are committed to being responsive to and representative of citizens' needs in London. These needs are today crystallized around the housing issue[171]. This is why we observe that housing affordability is at the core of both CLT's missions.

However, different sensibilities, albeit subtler than in the Los Angeles case, such as ecology and population targets also explain the discrepancies in operational features.

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[170] *T.R.U.S.T. South LA core mission is about social justice whereas for the Eco-Village it is to implement a demonstrative ecological project.*

[171] *They have also been about decent wages (see. "Living Wage" Campaign, Citizens UK).*

London CLT: Commissioning Genuinely Affordable Homes for the Lower-Middle Class

London CLT provides **genuinely and permanently affordable homes**, offering one way to address the growing gap in the housing market, between people who qualify for social housing and those who can afford to buy a home on the open market.
("London CLT," 2018)

When analyzing London CLT's mission statement, we see that the goal pursued by the organization is clear and concise: their work is centered on the provision of "*genuinely and permanently affordable homes*." As Dave Smith, former Head of the organization confirms: "*it has become the most prominent things of what we do. When we explain briefly what we do we say: we do affordable homes linked to wages.*[172]'

Nuancing this statement, we observe that in practice, the housing issue is considered holistically with regard to the neighborhood as is the case for CLTs in Los Angeles. London CLT is making great efforts in developing community spaces that would benefit local neighborhoods as part of their housing projects. Their ambition in the St Clement's project, for instance, has been to develop the "*new community heart on Mile end Road*" (Design and Access Statement, 2013). As a result, they planned on developing a mixed-used space comprising a café, a co-working space and a community event space.

As they aim to close a market gap (between social rent and the open market), the income bracket they target refers to the lower-middle class. This feature differentiates them from other CLTs such as T.R.U.S.T. South L.A. which targets the most disadvantaged communities (30-50% of the Area Median Income, AMI).

Their operational features match this target. For instance, we observe that linking housing unit prices to average income requires for their beneficiaries to have a steady income. In addition, as London CLT is focused on developing ownership schemes, potential residents are constrained by their ability to contract a mortgage. We observe that one of the eligibility criteria of London CLT – accounting for 20% of the application process –is "*being able to afford a London CLT home*" (London CLT, n.d.). As an illustration, in St Clement's project, housing unit prices range from £130,000 for a 1-bedroom unit to £235,000 for a 3-bedroom unit, compared to £500,000 on the open market (London CLT, 2016, March 16).

Analyzing residents' testimonies from the St Clement's pilot project[173] confirms that this target is reached. One can read on London CLT's website: "*Adrian, lived for 22 years in East London. 42, single, he has two degrees'*", "*Taj Uddin, a 40-year-old local government worker*", "*Jessie Brennan, a 34-year-old artist*", "*Rachael and Nathaniel Evans, despite their joint income of £33,000, and savings of nearly £70,000, they have been unable to afford anything in the area*" ("London CLT", 2018). Stephen Hill[174]

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[172] *The unit sale and resale price is based on the average mortgage available to households in the neighborhood. It is taking into account the Area Median Income (AMI) and amounts approximately ⅓ of the AMI.*

[173] *London CLT pilot project of 23 units, in Tower of Hamlets, to be completed in 2018.*

[174] *Head of C2O futureplanners and pioneer in the development of CLTs in the UK.*

corroborates: "*The challenge for all Community-Led Housing is that it doesn't focus on the most need.*"

Nonetheless, it must be highlighted that the London CLT allocation process doesn't only focus on income. It has been designed in consultation with London CLT members and relies on three other criteria: a five-year minimum connection to the project's Borough (25%), proof of involvement in the local community (15%), support of London CLT (10%) and in great need of housing (30%) (London CLT, 2016, March 16). Three of the five criteria (collectively accounting for 50% of the application process) thus relate to the household's involvement in the community, a point which nuances this analysis. Additionally, this fact echoes the importance of community engagement as highlighted through the analysis of the UK national framework in the introductory chapter of this work.

In coherence with its mission statement, London CLT positions itself as a commissioner of homes for local people. For its first scheme, it adopted a traditional model of development, partnering with developers – including private (Linden Homes) or not-for-profit ones (Peabody) – and buying at completion ready-to-move homes in order to meet the needs identified in the neighborhood ('agency root' model as implemented in St Clement's).

Although today the CLT is engaged in mainstream development, partnering with developers, it is still trying to promote direct or self-development in order to get a bigger margin of maneuvers (e.g. on the Lewisham site). In this case, the CLT works in developing the site internally[175].

RUSS: Enabler of Self-Built Initiatives

RUSS's vision is to create **sustainable community-led neighborhoods** and truly **affordable homes** right across London.
("RUSS," 2018)

Similarly to London CLT, RUSS has set a strong focus on housing provision. However, the core RUSS objective, similar to that of the Eco-Village in Los Angeles, is to showcase the CLT model, raise awareness about community-led initiatives and environmental sustainability at the neighborhood level

This environmental concern resonates in the name of the organization itself– Rural Urban Synthesis Society, RUSS. RUSS looks to "*improve environments for people and nature alike*" ("RUSS," 2018).

In this framework, the housing issue is seen as one component of their mission (RUSS, n.d.-a, p. 9). Their website reads: "*Our mission is to reduce our communities' dependence on fossil fuels, increase food security, encourage biodiversity and provide affordable housing for Londoners*" ("RUSS," 2018). Here, the regeneration of empty sites through affordable and energy-efficient housing is considered a means to achieve a

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[175] *Direct development induces a greater margin of manoeuvres but also comes with greater financial risks and responsibilities The CLT is then in charge of leveraging development finance once the planning permission has been granted.*

better quality of life. This feature echoes, in the conceptual framework, the aim pursued by CLTs in the UK to achieve well-being. This holistic approach can also explain why they developed diversified activities such as the school for Community Led Housing, the Self-Build Community Hub, gardening projects, etc.

Their will to build cohesive communities impacts their target population, which differs slightly from London CLT's. Analyzing the terms used on their website, we note their will to "*relieve poverty through provision of housing*" and "*give, protection to those in need*" as well as their desire to have their inhabitants *"[reflect] the local population with a mix of families, couples and single people, both young and old, and with a range of incomes*" ("RUSS," 2018).

This objective has, in fact, been achieved in their pilot project (Church Groove, Ladywell) through the development of mixed-tenures, securing an income mix across residents. Out of the 33 units, five units will be under social rent –to be allocated according to local authority housing register– and six rooms in two shared homes will be affordable rents (80% of the open market). In addition, 14 units will be made available on a shared equity basis (households purchased at 80% of the unit value), and the 12 remaining will be shared ownership (households purchased at 25–80% of the value[176]) (RUSS, n.d.-a, pp. 20-25).

In addition, RUSS's allocation criteria is similar to that of London CLT, which enables them to reflect the population of the neighborhood. These criteria include: affordability (relating to housing needs), a local connection of two years in the Borough and community commitment. RUSS also favor self-builder among renters and owners in order to maintain its ethos (RUSS, n.d.-b, p. 5).

While London CLT could be described as a commissioner, RUSS is an enabling organization supporting self-build schemes (as presented by the Lewisham Council). Both act as the missing link between the Council and the neighborhood communities (Housing Commission, n.d.).

5. Conclusion

The analysis of the national UK context helped us to draw a picture of the UK CLT as a localized institution which aims to improve service delivery and the well-being of organized communities.

Detailing the context of London, with a specific focus on Lewisham Borough, we shed light on the forces at stake between CLTs and local authorities (the boroughs or the Greater London Authority). We observed that London CLT and RUSS adopted similar

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[176] *According forecasts the minimum 25% equity stake in a 1-bed flat in shared ownership with RUSS would cost £77,500. (Russ, FAQ, n.d.).*

strategies of lobbying and campaigning at the borough- and city-scale in order to get legitimized and secure political support, especially concerning the early phases and access to land. In this sense, they enable local democracy to take shape. We also highlighted the win-win situation established between CLTs and the public authorities, as this innovative provision scheme contributes to supporting local authorities in the enforcement of their quotas.

Despite similar strategies, in the London case, as well as in that of Los Angeles, we observed that CLT operational features are, nonetheless, spurred by their missions. Both CLTs focus on the provision of affordable housing as part of a sustainable neighborhood approach, but specific sensibilities – such as the objective of closing a market gap or the belonging to a self-building movement – orient their operational mode (e.g. ownership/rental tenure, direct/indirect development etc.).

As a result, London CLT focuses on the lower-middle class and commissions affordable homes for purchase in order to meet the needs identified in a neighborhood. On the other hand, RUSS aims to showcase a model of social and environmental sustainability, favoring self-build practices and an income mix through the provision of various tenures.

PARIS
The Social Homeownership Challenge

1. Montreuil, a First Parisian Ring City Under Metropolization Pressures
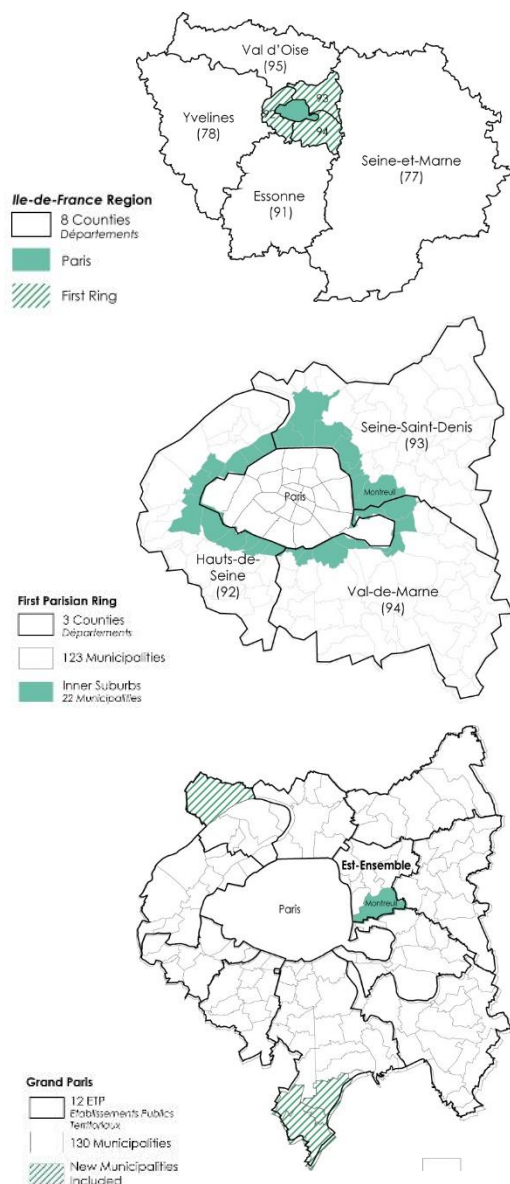
After the analysis of Downtown L.A. and Lewisham Borough in (London) contexts, we will focus on Montreuil, the second largest city[177] of the First Parisian Ring (*première couronne parisienne*). We will be studying the forces at stake in the development of the *Organismes de Foncier Solidaires* (OFS, CLT transposition) in the French capital's urban region.

The First Parisian Ring defines the 123 cities spread over three[178] of the eight counties (*Départements*) composing the Parisian Île-de-France region (see. adjacent map). It represents altogether more than 4.5 million inhabitants [179] (Insee, population census RP2015). This dense urban area plays a crucial role in the region's dynamism both in terms of demographic growth (0.6% between 2010-2015) and economic attractiveness as demonstrated, for instance, by the high density of international headquarters (Gilli 2014, p. 57).

This First Ring of cities have been encompassed into a broader urban entity in 2016 as part of the Grand Paris Metropolis project (*Métropole du Grand Paris*). Its implementation took about a decade, from the launching of an international consultation by then-president Nicolas Sarkozy in 2007 to its legal formalization in 2016 (see. laws MAPTAM, 2014 and NOTRe, 2015).

This territorial reform reshuffled competencies, notably in terms of housing, between core, peripheral cities, Agglomerations (*Etablissement Publics Territoriaux,* EPT [180]) and counties (*Départements*).

Fig.9. Administrative Layers of the Île-de-France Region (Source: Apur. Plotted by Diane Pialucha, 2018)

This reform aimed to rationalize urban governance creating twelve local authorities, the EPT (*Établissement Publics Territoriaux*). Today, these are partially in charge of local governance (including urban policies, provision of amenities, management of waste and water, etc.).

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[177] *106,691 inhabitants in 2015 (Insee, RP2015).*

[178] *Department of the Hauts-de-Seine (92), Seine-Saint-Denis (93) and Val-de-Marne (94)*

[179] *In comparison Paris counts 2,2 million inhabitants, and the Île-de-France Region 12 million.*

[180] *Formerly known as EPCI (Établissement Public de Coopération Intercommunale).*

Similarly to London, this process reflected a will from national and local governing authorities to increase Paris' competitiveness and outreach at the international level, as well as a need to fit a European vision of a continent governed by strong regional hubs (Bourdeau-Lepage, 2013, p. 407).

Along with a governance overhaul, the *Grand Paris* is also taking shape through the implementation of large infrastructure and urbanization projects.
Regional plans (*Contrat de Développement Territorial*, CDT) notably oriented the development of the region around the extension of high-speed transportation lines aiming to improve intra-suburb connections: the Grand Paris Express. In this project, we find similarities with development trends at stake in Los Angeles, the transit-oriented developments (Romain Paris, 2018b, p. 14).
One other development focus was as proposed in 2009 by Christian Blanc (State Secretary for Development the Development of the Capital Region), around the implementation of six specialized clusters [181] . Even though this vision had little repercussions on the ground, it notably led to the academic restructuring of *Paris-Saclay* University as part of the "Innovation Cluster" (Rio, 2014).
Finally, the Grand Paris territory is being currently shaped by mega-events such as the 2024 Olympics in the *Plaine Saint-Denis* (Seine-Saint-Denis, 93).

Metropolitan Dynamics
A New Administrative Breakdown
— 131 Municipalities
— *Établissement Publics Territoriaux (EPT)*

Regional transport development
— Grand Paris Express (line 15-16-17)
— Line 18
— Extension metro line 14
— Extension metro line 11
O Station

OFS Development
/// Municipal OFS in Project
Paris & Montreuil

▨ Coop. Foncière Francilienne
Cities where the CFF is established

Fig.10. Metropolitan Dynamics Fostering the Development of OFS in the Parisian Area (Sources: Opendata.apur 2015, Société du Grand Paris 2016,2017. Plotted by Diane Pialucha, 2018).

These development processes led over the past decade to urban concentration effects (Brueckner, 2011, pp. 1-2). Once again, as detailed by the adjacent map, metropolitan dynamics correlate with the establishment of OFS projects at the heart of the Parisian metropolis. As of today, three OFS projects have emerged in the region.
The *Coopérative Foncière Francilienne* (CFF), initiated by the *Fédération des Coop HLM* (Cooperative Affordable Housing Developers Federation) was launched 2017 in order to stimulate affordable homeownership at the regional scale. Today, it has three projects under construction: *Gennevilliers* (14 units), *Bagneux* (38 units), *Kremlin-Bicêtre* (10 units), two under study in *Malakoff*, and *Ivry-Sur-*

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[181] *I.e. Research, Health, Sustainability, Creation, Aeronautic, Finance, Sustainability, International Exchanges.*

Seine and few other are at the planning stage.

Additionally, two municipally-driven OFS are underway. The City of Paris, through its Deputy Mayor for Housing, Ian Brossat, has committed to the delivery of 100 OFS homes before the next municipal elections in march 2020.

As for the City of Montreuil, the administration realized a pre-feasibility study in 2017 to explore the opportunities of developing an OFS. However, as of today, the project seems to be on hold due, notably, to a change of staff at the Head of its Housing and Urban Development Department.

Fighting increasing pressure on the housing market, these OFSs aim to better control the allocation of land for affordable housing. Christian Chevé, Head of CFF (Coopérative Foncière Francilienne), details: "*This is why we created this tool: to be able to reinvest the First Parisian Ring, to offer innovative solutions of affordable homeownership to modest income households.*"

The City of Montreuil is at the heart of these experiments. Its proximity to and accessibility from the capital city (via the metro line 9), led to a renewal of its population over the past 20 years.

Industrial lands have been made available as the city evolved towards a service economy (Paris, 2018, p. 10).

Today, along the metro line, real estate prices are rising fast. As shown by the adjacent map, they are drawing near Parisian real estate prices (up to €7,000/m² close to the Montreuil City Hall, terminus of the metro line).

This trend reinforces the fracture dividing the Upper and Lower parts of the city. Lower Montreuil, which is easily accessible has become more and more attractive to Parisians. As an illustration, since the 2000s, the city has often been referred as the "21st District of Paris,[182]", reflecting a blurring of borders between Paris and its immediate suburbs. However, the reality turns out to be more heterogeneous (Collet, 2012).

Fig.11. Income in Relation to Prices per Square Meters in Montreuil
(Source: Geoportail 93, meilleurs agents, 2018. Plotted by Diane Pialucha, 2018)

The Upper Montreuil remains isolated[183] and gather the most fragile populations. For instance, we observe that it is in this area -as well as in the south-east- that we find some *Quartier Prioritaire de la Ville* (QPV, e.g. La Noue). QPVs refer to socially disadvantaged
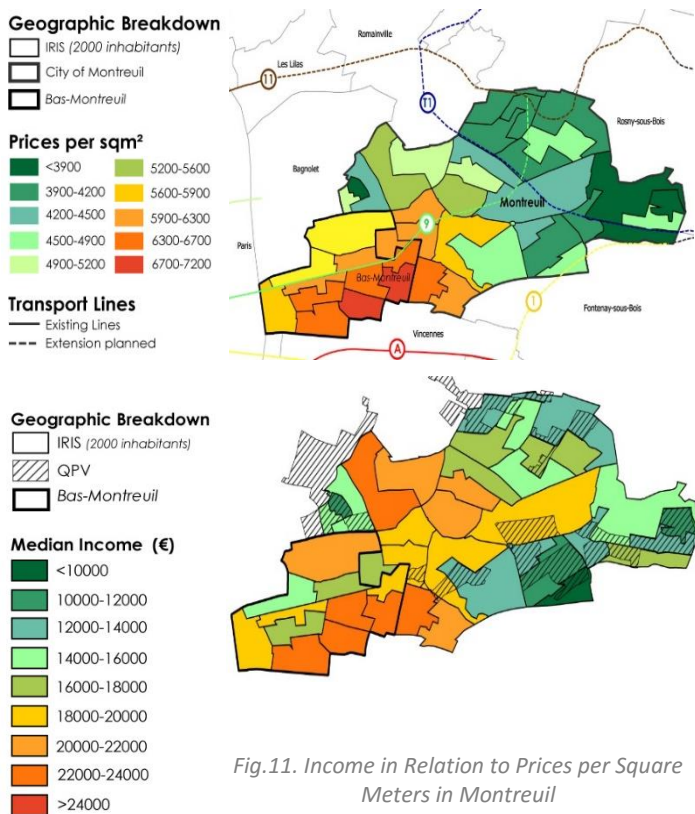
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[182] *The City of Paris itself is composed of only 20 Districts (*Arrondissement*s).*

[183] *Even though the project of extending the line 11 towards* Rosny-sous-Bois *by 2022 will contribute to redrawing the cityscape.*

territories where household incomes are the lowest. Specific urban policies (*Politique de la Ville*) are implemented based on this label. They aim to compensate for differences in living standards with the rest of the country through targeted educational or economic policies.

As brought forth by Romain Paris, former Head of the City's Housing and Urban Department, these two forces fragmenting the city are at the heart of the Montreuil municipality's urban strategy. They drove the reflection around the implementation of a municipal OFS in 2017[184]: "*The [OFS] project is still to be defined, but what I proposed was very much targeted towards gentrification.*"

The OFS initiative at the municipal level aligns within the left-wing political tradition of the city. Montreuil is one of the flagships of the "Red Belt." This term refers to a group of cities governed, in majority, by the French Communist Party (PCF) from the 1920s to the early 2000s. Following a shift towards the right wing during the 2014 municipal elections (Subra, 2014), Montreuil is one the rare cities of this group to still be governed by Communists[185]. This heritage permeates Montreuil with a strong socialist culture with the working class as a focal point (notably in terms of public services and social housing delivery).

Similarly to Lewisham Council in London, the Municipality of Montreuil is implementing proactive housing policies. For instance, social housing represents 38% of the total housing stock in the city.
However, under the Grand Paris scheme, local authorities, such as Montreuil, are now faced with increasing responsibilities, especially in terms of housing provision. The city is in charge of establishing–along with a *Plan Local d'Urbanisme*[186] (PLU)–a *Plan Local de l'Habitat* (PLH)–detailing its diagnostic, objectives and forecasts regarding housing provision at the local scale.
In addition, Montreuil has to fit within a wider regional urban plan (*Schéma Directeur de la Région Île-de-France,* SDRIF) and must incorporate an affordable housing requirement of 20-25% (*Loi Relative à la Solidarité et au Renouvellement Urbain,* SRU, 2000). To do so, they are notably partnering with the regional land bank (*Etablissement Public Foncier d'Île-de-France*, EPFIF) in order to unlock access land.

As a result, local authorities have the ability to control the entire housing provision chain - from land provision to housing delivery and allocation. The municipality, nonetheless, faces a difficulty in preserving affordability in the private market. Despite an incentivizing zoning code and a high construction rate[187] the demand remains very high. About 7,000

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[184] As a reminder, the project is today in standby.
[185] The last mayoral elections in 1994, elected Patrice Bessac (PCF, French Communist Party).
[186] The PLU is a planning document defining the main land use planning and guidelines of a municipality or group of municipalities.
[187] Between 7 and 11 units for 1000 inhabitants, compared to 4 at the regional level, which represents about 500-700 new units built per year (Paris, 2018, p. 10).

households are on the waiting lists for social housing, with an average waiting period of five years. In parallel, increasing prices have started excluding the middle class from homeownership, especially in Upper Montreuil (Paris, 2018b, p. 10).

In order to fight this externality, the Municipality of Montreuil, has already been active in trying to control the housing market. In 2015, it launched a "*Charter for Sustainable Construction*" in partnership with local residents. This document, although not legally binding, aimed to orient new construction towards better quality standards and regulate sales prices based on the neighborhood market. Romain Paris[188] details, "*It is a legally questionable document, but it exists, and is pretty much adopted by developers. We're not the only one to be doing so, but it's fairly advanced. A CLT[189] would be a good complement to our homeownership policies to fight gentrification*."

2. Behind the Scenes of the Institutional OFS Implementation in the Parisian Area

It is in this context that two actors–the Municipality of Montreuil and the *Coopérative Foncière Francilienne*[190]–plan to develop their OFS. As a reminder, in the first chapter of this dissertation we explained why the OFSs where developed in France by institutional actors (municipalities, developers, etc.), when the CLT model was initially based on grassroot initiatives. In this subsection we will analyze their respective positions in order to better understand how they intend to operate and why.

First, drawing a parallel with the situation observed in London, we observe that the OFS expansion in the Parisian region is conditioned by the development of strong partnerships. Both OFSs are advancing in connection with state and/or regional actors (e.g. the national bank -*Caisse des Dépôts, CDC,* the regional EPFIF land bank, etc.), with (affordable) developers, social landlords and local authorities (municipalities or *Etablissement Public Territoriaux,* ETP).

This observation echoes the conceptual framework. We raised the fact that the OFS has been designed as a light and flexible device with the aim of mobilizing a greater number of actors–including private ones–around the production of affordable housing (Lucats, 2016).

This interweaving of actors illustrates the adoption of a partnership-based approach. It also sheds light on a competition for land resources. The OFS, by facilitating access to land, is of great interest to the many actors positioned on the housing market in a context where land becomes scarce.

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[188] *Former Head of the City of Montreuil Urban Department.*
[189] *As used in French.*
[190] *An OFS run by affordable housing developers.*

This political game notably influences the scope and strategy of the OFSs on the Parisian territory. In that regard, the case of the *Coopérative Foncière Francilienne* (CFF) is quite illustrating. The CFF indeed adopted a regional scale and a cooperative governance; primarily because it corresponded with the historical operational features of its members[191]. Christian Chevé[192] details: "*Initially the Coop HLM [affordable housing developers] are organized by regions. Our OFS logically adopted comparable territorial boundaries. Moreover, it corresponds to the prefectural approval as defined by law.*"

However, it has to be raised that, this OFS, conducted by affordable housing developers, doesn't possess land of its own, as it could be the case for municipally driven OFS. This aspect impacts its business model. CFF has to buy land through long term land loans. Christian Chevé explains: *"The great difference with municipal OFSs is that we don't own any land. We don't have the same business model. We are financed through the* Caisse des Dépôts *(CDC) public bank."*

Under these circumstances, it is thus essential for CFF to partner with local authorities and incentivize cities to join the organization. Municipalities play a crucial role in enabling access to land (through donations and discount). They, moreover, have the ability to guarantee long-term land loans (from the CDC)[193] and invest in CFF capital (up to 50%).

Consequently, CFF's governance has been designed to facilitates the collaboration between the organization and the cities. Municipalities can today enjoy a privileged position, as are members of a specific decision-making committee, they have a voice in strategic orientations.

As for the scope, CFF originally based its status on the original governance of its members. It opted for a Cooperative Society (SCIC, for its French acronym). It implemented a multi-stakeholders OFS relying on the expertise of its 13 *Coop HLM* founding members[194]. Altogether, they form another decision-committee and are predominant in the Executive Board. These members are in charge of developing housing projects (Espacité, 2018, p. 15).

At the same time, the SCIC legal structure also enables CFF to benefit from a better access to funding, compared to foundations or associations. This point reflects the strategy of mobilizing municipalities and other external resources. Vincent Lourier[195] details: *"it seemed logical in regards of the objectives to have our partners engaged,*

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[191] CFF founding members are 13 Cooperative Affordable Developers.

[192] Head of CFF (*Coopérative Foncière Francilienne*), Regional OFS driven by the Coop HLM (affordable housing developers).

[193] The concessionnel loans provided by the Caisse des Dépôts *have to be guaranteed by Local authorities.*

[194] CoopImmo currently employs ⅓ FTE to run the organization, *lease and property management are taken in charge by the Gexio Cooperative, whose business core already was to administer properties (Cerema, 2018).*

[195] Head of the Federation des Coop HLM.

notably concerning land provision. The SCIC is a type of society that allows some kind of financial participation."

Furthermore, their position enabled them to move beyond political barriers and take the lead of OFS development in the region. As Vincent Lourier[196] explains: "*it would have taken an infinite time for public authorities to organize and find a compromise across the region. We have the operational culture of developers. It made sense to create our structure rapidly and open it to municipalities*" (Personal communication, February 23, 2018).

In a nutshell, the adoption of a regional scope and a cooperative governance enables CFF to maximize its activities. A strategy that pays off of today, eight municipalities have expressed their interest to join CFF[197].

On the other hand, the question of strategy and scale also arises for the OFS project in Montreuil. The scope adopted would directly reflect a political orientation. Four options have been considered which sheds lights on different standpoints.
A first option would be to operate at the ETP scale (*Etablissement Public Territorial*)[198]. The ETP, as a conurbation of cities, could indeed have better political leverages and more resources than the municipality of Montreuil. The ETP supported the OFS's feasibility study in that respect.
A second option could be, as presented above, to join the *Coopérative Foncière Francilienne* and provide it with lands and guarantees as a regular member. It would enable the City Montreuil to avoid the administrative costs of creating and managing its own structure.

Finally, the City of Montreuil could choose to take the lead of the OFS on its own territory. It could decide to take the complete control of the OFS as it is the case today for other municipal OFSs in Lille, Rennes… It would then partner with (affordable) developers or social landlords to produce homes. This operating mode, if more top-down, could present the advantage of facilitating the implementation process and producing results quickly.
Montreuil could also operate at the ultra-local scale using the OFS. Through the hybridization of models as observed in Lewisham Borough (see. London case study), the OFS in Montreuil could be used to support grassroot groups acting as an umbrella organization. As mentioned in introduction, the City of Montreuil already has the culture of supporting collaborative housing and could act in this continuity.

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[196] *Vincent Lourier, Head of the Federation des Coop HLM*
[197] Gennevilliers, Ivry-sur-Seine, Kremlin-Bicêtre, Malakoff, Pantin, Fontenay-sous-Bois, Nogent, Bris-sur-Marne
[198] *The "Est Ensemble" ETP gathers nine cities of eastern Paris. It is one of the 12 administrative entities which today compose the Grand Paris (see. map in introduction of this chapter).*

This perspective raises the question of how a municipality can support local actions and citizen engagement on the ground. Romain Paris[199] develops on this point: *"the question of the right scale has to be asked. It would be interesting to create a local structure for inhabitants to take part in the projects."*

It also asks the question of how to effectively overcome technical and financial barriers of community-led schemes. Indeed, as raised "*resident-led initiatives are always limited by their financial capacity*" (Vincent Lourier[200] Personal communication, February 23, 2018).

Similarly to the observations made in London and in Los Angeles, this debate sheds light on the necessity of adopting a wide scope in order to release political and financial resources, and dealing, on the other hand, with the will to involve residents.

The conciliation of those two factors could, however, be a reflection to further develop. Romain Paris[201], brings some preliminary elements of analysis on the subject: *"I think it [the OFS] should be a policy initiated and piloted at the metropolitan scale but the CLT could also be considered at a finer scale, if we want the civil society to have a role in it."*

In a nutshell, we observe that access to resources, most specifically land, emerges as one of the major issue defining OFSs' strategy. If municipalities own public lands, they cannot provide them for free to the OFSs on a sustainable way. It would put a heavy burden on their budget and deprive them from potential sources of income. In comparison, CFF, which doesn't have lands, require municipal collaboration to access debt finance from the national public bank (*Caisse des Dépôt*).

The local political game and competition for land most importantly affects the OFS's scope as well as governance. As of today, the institutional actors analyzed tend to favor a broad scope of action in order to maximize their impacts. However, the discussion remains open on how to involve citizens at the local scale.

3. Improving Low Income Households' Residential Mobility

However, access to resources is not the only parameter influencing OFSs' structuring. If the final end goal of the OFS seemed to have been defined nationally –develop social homeownership – the CFF and the City of Montreuil have different interests in doing so. We observe that the difference in nature between the two OFSs influence their vision and mission. Their operational features reflect different responsibilities towards the territory and, ultimately, the objectives pursued.

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[199] *Former Head of the City of Montreuil Urban Department.*
[200] *Vincent Lourier, Head of the Federation des Coop HLM*
[201] *Former Head of the City of Montreuil Urban Department.*

Coopérative Foncière Francilienne (CFF): Expanding the Social Homeownership Market

> "Our mission is real estate development with a social purpose."
> *(Vincent Lourier, Personal Communication, February 23, 2018)*

For the Coopérative Foncière Francilienne (CFF) the OFS and the BRS are considered as technical tools. Christian Chevé [202] corroborates: "*For us, [the OFS] is a developer-oriented tool [...] our approach is about developing a new product called the BRS [Bail Réel Solidaire]*." As illustrated by this statement, the focus point for CFF is more the BRS–defined as a product–than on the OFS itself. Their core business, as affordable housing developers, is indeed "*to sell, but at a reduced price*" (Paris, Personal communication, January 10, 2018).

As shown in the conceptual framework, the BRS, an innovative ground lease contract, enables them to bypass previous social homeownership policies' backlogs (e.g. PSLA, *Prêt Social Location-Accession*)[203]. Christian Chevé[204] confirms this assumption: "*the BRS is a timely innovation [...] The more the land is expensive the more there is leverage for municipalities to support the OFS.*"

The creation of CFF by the *Fédération des Coop HLM* had, as primary goal, to support the activity of its members. This is notably why the network has been so active at the national level throughout the transposition process. This point also explains why CFF final end products is very similar to its traditional developments. Christian Chevé[205] indeed illustrates the interchangeability between their BRS and previous PSLA products (*Prêt Social Location-Accession*, rent-to buy schemes): "*our projects were [...] already under way. The question was: 'are we certifying them BRS or not?' We're trying to, but if we don't succeed we'll commercialize them under PSLA.*"

The nature of CFF, not only has an influence on the OFS production but also on its population target. As London CLT, CFF targets lower middle-income households who "*wouldn't have access to ownership in those terms otherwise [...] [It] targets a modest population but not too modest. [It] tries to give confidence to lower-middle-income households to become owners, accompanying and securing them*" (Lourier[206], Personal communication, February 23, 2018).
Most specifically, CFF targets first-time buyers, who are currently tenants in the social housing stock. Echoing the conceptual framework, we observe that CFF's mission stems from the idea that the French social housing system is saturated and prevents the lower

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[202] Head of CFF (Coopérative Foncière Francilienne).
[203] As a reminder, public authorities had gradually stopped supporting social homeownership because unable to guarantee the long-term social impacts of their investment after the first resale. The BRS, introducing a perpetual control on resale prices solves this issue. Which explains the growing interest of Municipalities.
[204] Head of CFF (Coopérative Foncière Francilienne).
[205] Head of the Cooperative Foncière Francilienne
[206] Vincent Lourier, Head of the Federation des Coop HLM.

middle class from building capital. Christian Chevé[207] details: "*We have to offer tenants the opportunity to leave the social housing stock. It creates a flow, it frees up some units.*" Their philosophy is based on the concept of residential mobility. This notion, anchored in the law (MOLLE, 2009), refers to the idea that each household should be offered the opportunity to benefit from housing that corresponds to its needs and resources at each stage of its life (e.g. family expansion, reduced resources, etc.).

An analysis of the products provided by CFF enables to better grasp this population target - in regards of income ceiling criteria set at the national level. In 2019, in the Parisian region (Zone A), the maximum income to access an OFS home amounted €32,442 for a single person ("Coop HLM," 2019). In comparison the median income at the *Grand Paris* scale was €21,900 (Insee, FiLoSoFi, 2013). The income bracket targeted is thus quite high.

A recent evaluation of the OFS model (Espacité, 2018) has shown that high construction and land costs can question the genuine affordability of the homes produced by CFF compared to the open market. It has been shown that CFF produces homes at 15-25% of the open housing market[208]. Additionally, if cost of land, if not paid straight up at purchase, it feeds through monthly BRS ground leases (€1-3 per square meter depending on projects). This extra cost, adding up to services charges and mortgages repayment, can be significant for households.

This perspective emphasizes on the developer logic of CFF but is overlooking an important feature of the organization driving its operation: its cooperative values. As public authorities and founding member benefit from decision-making authority, under the cooperative principle "*one person, one vote*", each member -including residents, could thus be involved in CFF's strategic orientations.

Citizen engagement corresponds to CFF values and the *Coop HLM* (the developers) are very much inclined to leave the door open to certain developments in this direction. For instance, some of CFF members, such as CoopImmo, have already supported participatory housing project under BRS schemes (see. Makaron Project in Malakoff).

However, as of today, the Resident Committee is not operational and the inhabitant voice not quite represented. Vincent Lourier[209] highlights this barrier: "*That is the flaw in the system, we foresaw some space for the inhabitants, but, as we observed in our traditional operations, their role remains quite virtual.*"

The *Fédération des Coop HLM* is considering the potential democratization of the instrument on the long run: "*if we manage to trivialize the OFS tool, we could indeed imagine an appropriation of the concept by citizen movements.*" It foresees the

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[207] *Head of CFF (Coopérative Foncière Francilienne).*
[208] *The difference can reach up to 45-50% for the OFS driven by municipalities which don't require borrowing for land.*
[209] *Head of the Federation des Coop HLM.*

development of partnerships between participatory housing groups and CFF: "*if citizens want to seek our help we would be able to accompany them*." But nonetheless raises the issue of temporality, reminding us that the OFS model remains to be exploited: "*it's not the priority though, we need to prove the concept first, prove that it works, and then we'll see how it could evolve*" (Vincent Lourier, Personal communication, February 23, 2018).

In a nutshell we see that, for the *Coopérative Foncière Francilienne* (CFF), the OFS and the BRS are considered as operational tools to be adjusted to the existing practices of its founding members (affordable housing developers). It is used as a means to reactivate social homeownership in the First Parisian Ring. The OFS targets primarily the middle class, first-time buyers, currently tenants in the social housing stock. CFF is market-oriented but build upon public support opening access to homeownership to a class traditionally excluded from it. CFF currently operates in a rather top-down way but takes into account the possibility of further citizen participation in its projects and governance.

Montreuil: Improving Local Housing Policy Efficiency

The Urban Department of the Montreuil City reflected on the creation of an OFS in July 2017. After a first feasibility study, the objectives set were to conduct the official OFS creation (governance, scope, operation, etc.) by the end of 2017. However the project is ever since in standby.

As for the City of Montreuil, the vision of what the municipal OFS could become still remains to be refined but the missions pursed could be multiple.

Firstly, used to correct and control the open market, it could enable the City to enforce local housing policies, limit gentrification, and support the funding of intermediary housing units; all this while guaranteeing the impact of public investments on the long run.

Secondly, an OFS could in parallel be used to support the participatory housing movement (equivalent to community-led housing in the UK, or collaborative housing movement at the EU level). As mentioned in the previous section, Montreuil has a strong history of participatory housing (see. flagship projects such as *Couleur d'Orange, Comme un Baobab*, etc.). The City is for instance a member of a National Network of Local Authorities for Participatory Housing (RNCHP, for its French acronym).

Finally, and more prospectively, the OFS could also be implemented in disadvantaged neighborhoods (QPV, *Quartier Prioritaire de la Ville*). Similarly to what is experimented by RUSS CLT (see. London case study), this process could then foster an income mix through the development of mixed-tenure buildings (social rents, affordable rents, BRS, open market, etc.).

In that sense the philosophy behind the OFS development could draw near to CLTs' one and towards citizen empowerment. It, in addition, joins the *Coopérative Foncière Francilienne* (CFF) on the vision of improving the beneficiaries' residential mobility.

This perspective is developed by some municipalities, such as the City of Lille[210]. Romain Paris[211] details: "*it would be interesting, in neighborhoods where you have more than 80% of social housing[212].Rather than dreaming of attracting homeowners, we could try to support the people residing in the neighborhood to organize into an OFS and become owner themselves. We could be working on the local development basis*."

This last statement could let us think that the population target of an OFS in Montreuil might not be as high as for CFF. When considering a €17,138 median income in the city, it would indeed be difficult for the OFS to target the highest income bracket allowed by national texts (€32,442).

The debate around the right population to target within local housing policies is preeminent for every municipality interested in developing an OFS. For instance, the City of Paris, currently working on an OFS project, is concerned by the fact that some households, under the maximum income ceiling at a certain period of their life, might benefit from an OFS home without any time limit, and this despite possible income increase. It also raised issues of inheritance and risks management which remain blurred.

Governance and operational features also remain under discussion for the OFS project in Montreuil. However, we could be drawing a broad picture based on the practices of other municipally driven OFS in France. For instance, Montreuil might donate municipal lands for their first pilot projects with the effect of decreasing the housing costs. It could release subsidies to implement this housing policy[213] as well as implement a 30% tax break on real estate tax for would-be buyers.

As a result, the exit prices for OFS homes in Montreuil might be similar to what is implemented in Lille for instance (30-50% of the open market), with a monthly BRS ground lease oscillating between few cents to one euro per square meter (Cerema, Espacité, 2018).

If decision makers in Montreuil reaffirm a political will to implement an OFS on their territory the next steps would be: drafting the status, defining the governance and scope of action of the OFS, drafting the accreditation document and re-actualizing the first feasibility studies (identification of a site, transfer of land, choice of a developer, etc.).

In short, the analysis of a municipal OFS project showed us how to the OFS could be used to foster local housing policies. In Montreuil, for instance, it could support access to homeownership, participatory housing or again social income mix within urban projects. We shed light on the power a municipality can have over the entire development chain and how could it could use the OFS to implement its policy objectives.

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[210]*See OFSML "Rue Renan" project at Lille.*
[211] *Former Head of the City of Montreuil Urban Department*
[212] *Referring here to the Quartiers Prioritaires de la Ville (QPV).*
[213] *For instance, the city of Rennes is spending €5 million yearly to implement its social homeownership policy.*

4. Conclusion

After having analyzed the French national context, the OFS – transposition of the CLT model– emerged as a technical tool implemented to bypass previous social homeownership policy failure. It is, as of today, an instrument specifically turned towards the lower middle class.

Detailing the specific context of the Grand Paris, we observed how metropolization forces (territorial political reforms, transportation projects and mega events) are currently redrawing the French capital city. Most specifically, in Montreuil, a former industrial city, historically left wing, decision-makers are leading reflections on how to prevent externalities and slow down the fragmentation of the city.

Both OFSs analyzed are pursuing the similar purpose of fostering the residential mobility of middle-income, first-time buyers through homeownership. We saw how the OFS, an innovative ownership mechanism, can be mobilizing, in that perspective, traditional channels of housing production at the local scale.
However, access to technical, political and financial resources greatly influences their implementation strategies. Local political game requiries them to build partnerships between public and private actors. Access to resources notably affects OFS scope (from project to regional scale) and governance. For instance, in the case of the *Coopérative Foncière Francilienne* (CFF) a cooperative governance enabled their partners to invest and provide land.

But most significantly we observed that the difference in nature between those two institutional OFSs - a municipal one, and another driven by affordable housing developers - impacted pre-eminently their vision, mission, and how they operate.

On the one hand, the City of Montreuil, through its OFS project, pursues the objective of improving its local housing policies. As guarantor of housing affordability on its territory, the City would put in place an instrument adapted the need and aspirations of its citizens -and electors. This obligation implies to ask the question of the right scale to adopt, level of citizen engagement, allocation criteria, etc.

On the other hand, the *Coopérative Foncière Francilienne* (CFF), driven by affordable housing developers, has the mission of selling homes at reduced price. Pursuing a social mission, it is nonetheless developing a market. A point which orients its population target towards the middle class and drive its housing offer upwards.
In order to carry its activities, CFF necessitates financial and political contributions from the public sector, partly justifying the adoption of a broad regional scope, maximizing its operation.
Finally, CFF cooperative value influence its operational modes, in particular by balancing the role of public, private and citizen involvement in the organization.

COMPARATIVE ANALYSIS
The Influence of a Triple Constraint System on CLTs and OFSs

Throughout this dissertation we shed light on how the different national and local contexts influenced the transposition of the CLT model from the US to the UK and France.

The analysis of this circulation highlighted existing links and bridges between models. It also raised the issue of a possible erosion of the master or "classic" CLT framework[214]. As noted by scholars and activists, the intense "*hybridization could become a bane for the model, diluting or extinguishing characteristics that have made the CLT unique*" (Davis, 2010, p. 38). As a result, the model's flexibility and adaptability might ultimately become its weakness. The risk identified would be for "CLT" to become an ad hoc label without shared definition of goals.

With that in mind, the position adopted has been to stand back and set the heterogeneity of contexts as a focal point in order to better understand CLTs in their diversity. The objective was– through a comparative analysis– to give actors engaged in the CLT movement background information to nourish the debate around the definition and realities of CLTs on the ground. We are convinced that a better understanding of contexts is the key to the development of a common ground between existing CLTs and would help fight a possible model dissolution.

Throughout three case studies– Los Angeles, London, Paris– we focused on six rules or parameters identified as decisive in the different models (see. table below)

MISSION (content)			STRUCTURING (form)		
What	**What for**	**For whom**	**Scope**	**Governance**	**Operation**
Essence	Goal pursued	Population target	Boundaries	Management	Implementation strategy

Tab.5 *The Six CLT Rules*

The presupposition was that unfolding these rules in a variety of urban environments would help disentangle how the CLT model has been affected by its transposition into different contexts. Ultimately the goal was to shed light on similarities and discrepancies between CLT definition, implementation and outcomes in each of the contexts.

The preliminary thesis was that context affects CLTs through a triple-constraint system. This constraint system is expressed at the national, metropolitan and individual levels with every level impacting certain rules to a different extent.

We have been testing the following hypotheses and will draw the necessary conclusions in this comparative chapter:

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[214] Defined by the Ownership, Organization and Operation features (see. conceptual framework).

▶ HYPOTHESIS 1/ National frames, through specific public policy practices, set general guidelines and define the essence of national models.

▶ HYPOTHESIS 2/ Metropolitan frames influence the CLTs' structuring (i.e. their governance, scope and operational features).

▶ HYPOTHESIS 3/ Individual frames influence CLTs' missions (i.e. their population targets and objectives)

1. National Frames Defining Core Principles

In light of the elements brought forth by the analysis of **national public policy environments**, **agenda-setting processes** and **legal formalization** we have been able to draw up the following table. It illustrates how national frames contribute to influence Community Land Trusts' missions and structuring.

	MISSION			STRUCTURING		
	What	**What for**	**For whom**	**Governance**	**Scope**	**Operation**
United States	Local institution	Fill public service gap	The most disadvantaged*	Tripartite governance	Community	Affordability mechanisms *(dissociation, resale formula)*
United Kingdom	Local institution	Improve service delivery	Any organized community	Under community control	Community	*Not defined*
France	Technical tool	Foster social homeownership	Households under income ceiling	*Not defined**	*Not defined**	Precise legal definition of the OFS and BRS tools

Racialized community, 30-50%AMI
*** Depends on status adopted*

Tab.6 *National Frame's Impact on CLTs and OFSs*

The analysis of national frames in the US, the UK and France informed us that the essence (the "what") of CLTs and OFS is strongly shaped by public policy practices. These reflect, among other things, in legal formalization.

In the US and the UK, CLTs are defined as local institutions which aim to fill public service gaps or improve service delivery. In France, OFS are considered technical tools fostering social homeownership policies.

We observed that this difference relates back to the weight given to local communities[215] and/or public authorities in urban policies, most specifically with regard to housing delivery. The concept of community emerges as the main tension point between the Anglo-Saxon and French models.

This notion strongly influences the nature of these organizations and, incidentally, their missions. For instance, in the US, marginalized populations are the one suffering the

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[215] *Defined as « all persons residing in the CLT territory. Whether or not these individuals sustain relationships on a daily basis, whether or not its members share common sociological characteristics » (Attard, n.d., p. 5).*

most from inequalities in terms of service delivery. Consequently, they are the ones mobilizing and organizing their claims at the grassroots level. In France, on the other hand, the model is taken over by large institutions such as the municipality or affordable housing developers. In a context of State retreat from this sector, these actors are being given increasing responsibilities in terms of housing delivery.

The idea of community also influences CLTs' and OFS' target populations. Under the Anglo-Saxon CLT model, target populations are primarily characterized through the affiliation and engagement in a given community (demonstrated through campaigning, volunteering, etc.). On the other hand, in France, the OFS' target population is defined through an income ceiling criteria, stemming from the idea that every citizen should be provided the same opportunities.

Finally, this concept also has an effect on CLTs and OFS' scope and governance. While the adoption of the "classic" CLT structuring (Ownership, Organization and Operation) in the three countries remains incomplete, in the UK, community control remains a preeminent parameter. This control is, however, enforced in various ways. A large room for maneuver exists, that results from a broad CLT definition at the national level.
In the French context, on the other hand (and contrarily to strict operational features), scope and governance are left in the background of national legal texts. This observation echoes the conclusion drawn in the conceptual framework that the "organization" parameter is not decisive of the OFS typology.

To conclude, we must note the main convergence point between these models. We argue it lies in their affordability mechanism (dissociation, resale formula etc.).
A new ownership model is defined in the US and France via the introduction of CLTs and OFS; a pre-existing model (leasehold-freehold system) is adapted in the UK to meet CLT needs.

Returning to the conceptual framework, and most specifically to the analysis of the agenda-setting processes, we can, thus, confirm that housing affordability and the fight against speculation are the catalysts for contemporary CLT and OFS current developments. Actors aligned on the need to rethink property rights to ensure affordability and sustainability. However, they did not necessarily align regarding ways of achieving this –notably on the role given to citizens and public authorities in the process.

▶ Essentially, the analysis of national contexts helped us to **clarify our first hypothesis**. We assumed that national frames define the essence of every model. They indeed give guiding direction in establishing shared identities. However, depending on the country, the binding nature of this frame varies– from quite determining in France to very broad in the UK. It is also crucial to recall that frames are not defined unilaterally from the top down, but rather result from cross-circulation between national and local political spaces (Béal, 2015).

1. Metropolitan Contexts Influencing CLT's Strategies

The three in-depth case studies of Los Angeles, London and Paris enabled us to shed light on metropolitan governance, urban development and housing policies in order to better grasp how these local contexts influence CLT strategies by releasing political and financial support.

	MISSION			STRUCTURING		
	What	**What for**	**For whom**	**Governance**	**Scope**	**Operation**
Los Angeles	Defined at the national level	Fight or limit gentrification	Residents living in a community under real-estate pressure	Grassroots	Small enough to secure community control	Low financial and political support leads to a diversity of operational modes
London	Defined at the national level	Enforce local democracy through dvlp. of afford. housing	Lower to middle class in housing need	Deconcentrated management	Citywide deployment, Remain under residents' control locally	In constant negotiation with local authorities (campaigning, lobbying)
Paris	Defined at the national level	Defined at the national level	Defined at the national level	Driven by institutional actors (Municipalities, affordable housing developers, land banks…)	Defined at the national level but strongly depends on resources available	Defined at the national level Mobilize traditional channels of affordable housing production

Tab.7 *Metropolitan Frame's Impact on CLTs and OFSs*

First of all, the analysis of local urban contexts in Downtown Los Angeles, Lewisham Borough (London) and the City of Montreuil (Paris) allowed us to refine some of the observations raised previously. We saw that individual metropolitan contexts don't seem to impact the essence (the "what) of CLTs and OFS as defined nationally. In the US and the UK, CLTs are legitimized as local institutions, usually partnering with local governments and/or affordable housing developers to conduct their projects. In France, the OFS and the BRS are used by current actors as technical tools, but remain to be further exploited.

We, nonetheless, observe that both CLTs and OFS are place-based and are responsive to local contexts. Metropolitan dynamics foster the creation of CLTs and OFSs, especially in financialized cities where the housing supply is scarce and the real estate market is under pressure.
The local political game and urban development practices drive CLTs and OFSs strategy and determine whether or not they have access to financial, political and technical resources. The local context notably impacts the scale of their action, their governance and their operational mode.

In Los Angeles, low financial and political support forces grassroots communities to look for innovative and autonomous urban development strategies. They set tight boundaries and have strict membership in order to be able to keep the control of the territory and target their actions more effectively.

In London, CLTs envision a citywide outreach. For this reason, securing political support from public authorities is crucial in order to be legitimized as viable partners. The relationship between CLTs and public authorities is built on the basis of constant bargaining fed by recurring campaigning and lobbying. While scaling up, they tend to adopt a deconcentrated governance scheme based on local branches and capacity transfer. However, throughout this process, CLTs make sure to stay under residents' control. This enables local democracy reflecting citizens' claims.

In Paris, OFSs are, to date, driven by municipalities or affordable housing developers. Their functioning is inscribed within the traditional channels of affordable housing production. However, the implementation of partnership approaches between all the actors engaged in the sector emerge as crucial to best mobilize political and technical expertise, and well as land.

We must also note that core CLTs' missions (objectives and population target) also adapt to metropolitan specificities. For example, we see that the context of Los Angeles drives CLTs towards the fight against gentrification and eviction. It targets communities living close to Downtown L.A, where the market pressure is the most significant. These populations happen to be mostly African-American and Latino communities, for historical reasons.

In the same vein, in London, the focus given to housing is an expression of local democracy. Solving the housing crisis emerges as the number one concern expressed by citizens during political campaigns. Due to the current housing situation in the capital, London's CLTs' target population is oriented in a way that addresses the growing gap between "*people qualifying for council property and the people who can afford to buy their own home*" (London CLT, 2018).

In Paris, even if the target population is defined at the national level, OFSs prioritize first-time buyers, tenants in the social housing stock, with a view to residential mobility.

▶ This analysis of metropolitan contexts brings us back to **our second hypothesis**. Confirming our assumption, we argue that the metropolitan context primarily[216] impacts CLT/OFS structuring and, more specifically, their strategy to get legitimized and secure access to land. Land scarcity and local political situations foster the need for CLTs and OFSs to organize and develop original strategies to tackle rising housing prices.

There are, however, some nuances to this point. We observe that local contexts seem to have a greater effect on the Anglo-Saxon CLTs than on French OFSs. The latter seem more constrained at the national scale; a subject diserving further investigation.

In addition, we must also add that it proves to be quite difficult to determine to what extent local contexts ensue from national history and politics.

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[216] *Even though it also influences CLT/OFS objectives and population target.*

1. The Preeminent Role of Individual Missions in Refining CLT and OFS Structuring

Finally, the analysis of specific cases gave us a deeper understanding of the different CLT models.

	MISSION			STRUCTURING		
	What	**What for**	**For whom**	**Governance**	**Scope**	**Operation**
T.R.U.S.T. South L.A.	*Confirmed as a local institution*	Social, economic and environmental justice	African-American and Latino Communities	Tripartite governance	-Defined by major transportation axis -Overlapping neighborhoods and districts	-Campaign -Partner with affordable housing developers -Rely on LIHTC
Los Angeles Eco-Village	**Internal conflict** - Technical tool supporting a demonstrative project -Org. open to the surrounding community	**Internal conflict** -Environmental sustainability -Stabilize neighborhoods	**Internal conflict** -Intentional community - Neighborhood's residents	Tripartite Governance, under discussion (to be evolving into a dual structure)	**Internal conflict** -2 blocks -1-mile radius around a metro station	-Autonomous -Rely on donations, investment from members and DIY practices
London CLT	*Confirmed as a local institution*	Provide genuinely and permanently affordable homes linked to wages	-Lower to middle class in housing need, -High social involvement -In capacity to contract a mortgage	Tripartite governance	Deconcentrated -Citywide outreach -Rely on organized community at the borough level	-Campaigning lobbying, -Direct development and agency root model -Rely on community shares and ethical finance
Rural and Urban Synthesis Society (London)	*Confirmed as a local institution*	Create sustainable community-led neighborhoods	-Diversity of income mix -Affiliation to the self-built movement	Not under tripartite governance but centered around its members	-Lewisham Borough -Aim at scaling up to city-level	-Campaigning, lobbying, -Self-building -Rely on grants and loans from ethical bankers
***Coopérative Foncière Francilienne* (Paris area)**	*Confirmed as a technical tool*	-Deliver a product (BRS) -Improve the residential mobility of tenants	-Tenants of the social housing stock -First time-buyers under income ceiling	-Cooperative governance -Inspired from the functioning of its founding members	-Regional -Based o the functioning of its founding members	-Rely mostly on public lands and concessional loans from public bank -and on the expertise of its members
Montreuil OFS project (Paris area)	*To be defined*	-Enforce local housing policies -Support local initiatives on the ground	Tenants of the Montreuil social housing stock	*To be defined*	*To be defined*	Will probably rely on public resources (tbc)

Tab.8 *Individual Frame's Impact on CLTs and OFSs*

The individual analysis of CLTs and OFS, notably through the examination of their mission statements and daily operation, shed light on the diversity of their objectives and enabled us to see nuances between them. Specifically, we saw that their core objectives are diverse: from social and economic justice, to the implementation of a demonstrative project, the development genuinely affordable homes and of community-led

neighborhoods, and finally the delivering of a product, or the enforcement of local housing policies.

These goals are often tightly linked to the nature of the organization (grassroot, driven by the charitable sector, by municipalities, etc.), as well as to the population the CLT/OFS aims to serve (most often disadvantaged communities, intentional communities, the lower-middle class, social housing renters etc.).

Their missions depend on core values entrenched in individual CLTs and OFSs from their genesis. We could, for example, cite the belonging to existing worldwide movements such as the self-building movement for RUSS in London, the Eco-Village movement in Los Angeles and the cooperative movement for the *Coopérative Foncière Francilienne* (Paris) or the participatory housing movement in Montreuil.

Clearly, specific situations, history and values are determining factors in the definition of CLTs' and OFS' objectives and target populations. Most of the time, these local factors surpass constraints brought by national frames and metropolitan contexts.

The analysis of individual situations also enabled us to pinpoint the values shared by CLTs and OFS, that is convergence features, such as their focus on housing needs and non-speculative mechanisms. In each case analyzed, the idea of homes as not-for-profit assets and the fight against inequalities were driving forces. CLTs also shared, in filigree, important sustainability concerns whether environmental, social or economic.

However, an important point has been overlooked by our preliminary hypothesis which assumed that individual frames influence primarily CLTs' and OFSs' missions. It is that their missions also strongly influence how CLTs and OFS *operate* (i.e. their structuring: governance, scope, operational features).

For instance, Los Angeles Eco-Village developed autonomous practices (a revolving fund, DIY practices, etc.) in order to prove their financial independence and environmental sustainability. Similarly, London CLT's community organizing culture, or use of community shares, ensues from a will to enforce local democracy and empowerment.
CLTs/OFSs' missions strongly influence their activities. In the case of T.R.U.S.T. South L.A., for example, their claim for economic, social and environmental justice pushes them to take a variety of actions towards capacity building, empowerment and, again, transportation. Similarly, RUSS' (London), environmental concerns lead them to propose self-build training, gardening or and other open-air activities.

Finally, we see that missions impact what CLTs and OFSs offer. In France, as the OFS are seen primarily as a means to foster homeownership, the result is the production of for-purchase homes. In parallel, for RUSS or London CLT, their strategy is more about developing sustainable community-led neighborhoods. For this reason, while they implemented mixed-tenure housing projects (social, affordable rents, shared equity,

etc.), they also developed a community center. Going further, Los Angeles Eco-Village, fostered the development of shops and working spaces and is currently working on developing a hotel.

▶ To summarize, this last section has shed light on the preeminence of the ultra-local level. Refining our **third hypothesis**[217], we saw that individual situations are key in defining CLTs' and OFS' missions (including goals and target populations). At the same time, these missions also drive how the CLTs and OFS operate (i.e. their activities, products delivered, etc.), sometimes overcoming the national and metropolitan frames.

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[217] *Individual frames influence CLTs' missions; population targets and objectives.*

CONCLUSION
And Now What?

This professional dissertation has aimed to compare Community Land Trusts (CLTs) (a local, democratic and anti-speculative model) within the context of three countries, the US, the UK and France, in three metropolises, Los Angeles, London and Paris.

We supported the thesis that, as the CLT model circulated worldwide, the initial CLT model, as defined in the US, needed to be crossed-compared with a variety of its successors. We argued that now, a variety of CLT models exist, resulting from triple constraint systems expressed at the national, metropolitan and local scales. Through this professional dissertation we tried to determine how these constraint systems influenced the definition and implementation of CLTs in dense urban contexts.

We saw that national contexts have given general directions and specified every model's guiding principles. In the Anglo-Saxon countries (the US and the UK), CLTs were defined as local institutions filling an urban service gap. In France, the OFS were designed as technical tools to overcome backlogs in terms of social homeownership policies. The definition of national frameworks occurred through cross-circulation whereby grassroots advocates pushed for the agenda and oriented these definitions.

At the metropolitan level, local political games constantly influence CLTs' and OFS' strategies and structuring (scope, boundaries, and operation). Disruptive events, such as real estate pressure, riots, or megaprojects notably fostered the creation of CLTs/OFSs. For instance, in the US and the UK, their development is centered on strong lobbying campaigning in order to get legitimized and access land. By releasing or not financial and political resources, public and private bodies direct CLT and OFS development. These strategies span from being strongly embedding in local political life and the traditional housing provision scheme, to being withdrawn and functioning autonomously.

Finally, through an analysis of individual situations, we saw that the organization's genesis and core values greatly determine its missions (what, what for, for whom). In turn, these missions strongly influence how the organizations operate (their governance, scope, operation). This fact sheds light on the preeminence of the ultra-local level. Bypassing national and metropolitan frames, the local level is what primarily impacts the definition, implementation and outcomes of a CLT/OFS.

To conclude, we would like to return to general CLT debates; notably on the assumption that CLTs' diversity—often seen as their main strength— is due to the flexibility and adaptability of their master framework.
Building upon this point, it seems important to emphasize the role of local environment in which CLTs/OFSs operate to explain this diversity. This work has explored divergent

contexts and has shown how they impact CLTs/OFSs' rules or parameters (what, what for, for whom, scope, boundaries, and operation). It shed light on the diversity of CLTs institutions, the form they take and the outcome they produce.

In a time of rapid development of the CLT movement, understanding these contexts and how they apply to CLTs and OFSs is crucial.
Picking up on the risk raised in the introduction - CLT model erosion - we would like to add that CLT diversity could only endanger the model if existing variations are seen as interchangeable. That is to say that CLTs and OFSs have to be considered taking into account the context in which they are evolving.

On another note, there are a few limits to this work that must be taken into account. The most significant being that this dissertation mainly focuses on divergences between CLTs and OFS. Quickly highlighting a few convergence points, we note the prominence of the housing focus, the consistent use of similar affordability mechanisms across models and shared core values. One next step in future research could be to focus on convergences between CLT models.

Additionally, we have to bring forth the fact the six CLT rules (what, what for, for whom, scope, boundaries, and operation) have been defined empirically and could be developed further in order to better grasp and characterize the CLT models.
An even bigger issue can be highlighted in certain causal relationships drawn between those rules and the different levels of constraints. These are often difficult to disentangle and, thus, remain open to debate.

Following this work, two tracks may now be considered. First, work could be done on the re-actualization of the master CLT framework with regard to international experimentation in order to make it stronger and even more inclusive. It is possible, however, that this process could dilute the CLT framework's specific principles, thus blurring the lines between CLTs, collaborative housing, social and affordable housing. The question of exploring the potentialities of convergence between these different housing modes, therefore, opens an even greater door for future research.

Another perspective could be to reorient the various existing CLTs' variations, specifically those of the OFS, in order to bring them closer to the master framework.
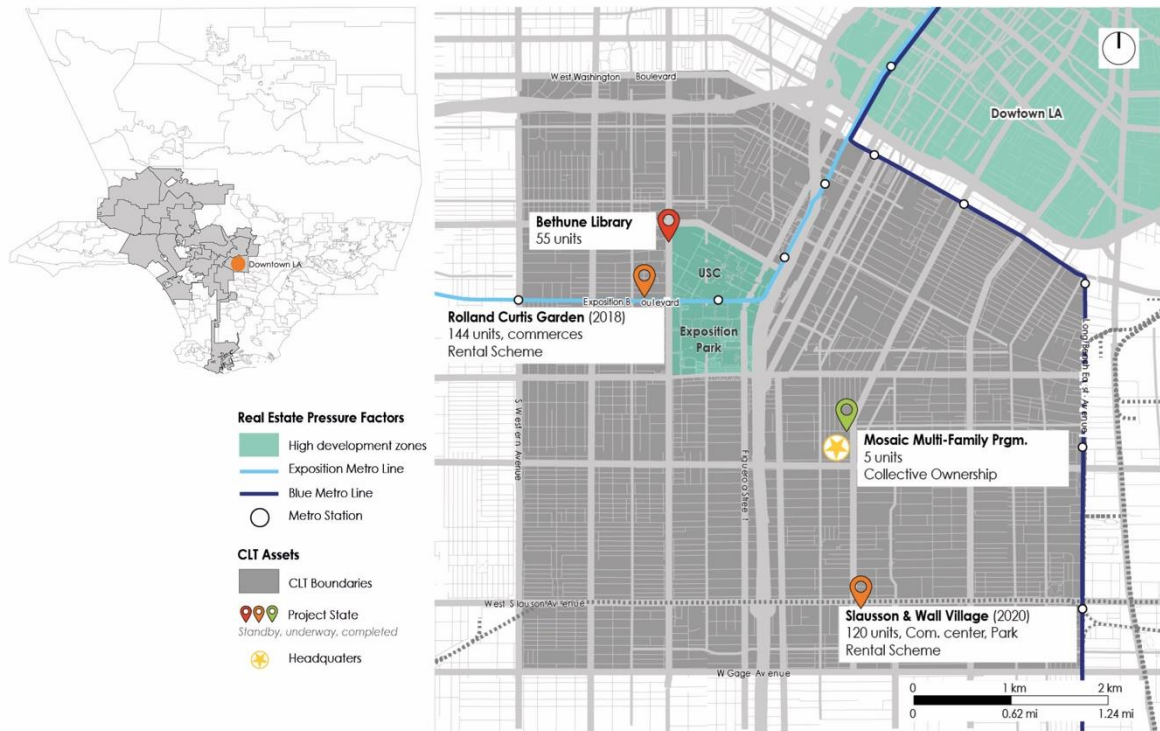This could, for instance, consist of leading reflections on how to include the most disadvantaged in the model, bypassing the housing as well as the acquisitive issues.
Finally, future research could focus on the development of non-residential components and/or alternative tenure (rental, cooperative schemes, etc.), using the CLT model as an integrated urban development tool.

APPENDIX

1. The Six CLTs at a Glance

	TRUST SOUTH LA: **Tenemos que Reclamar y Unidos Salvar la Tierra**
Localisation	Downtown Los Angeles, California, United States
Date of creation	2005
Context of creation	-Higher pressure put the land due to the development of the USC university campus, a museum centre, the expansion of the Expo metro line and the expansion of Downtown LA. -Figueroa corridor campaign: A group of women organized in response to increasing displacement, disinvestment and eviction of poorer households undergoing in South LA.
CLT boundaries	-Boundaries defined by major transportation axes (Washington Boulevard, Western Ave., Long Beach Ave., and Cage Ave.) -Covers two districts (District 9, and District 8) -Touches upon several neighbourhoods of South L.A. including: University Park, Exposition Park, Historic South-Central, Vermont Square, South Park and Central Alameda.
Legal structure	Non-profit organization (501c3)
Population target	Low income and racialized communities living within the CLT boundaries.
Neighbourhood features: South Central L.A. *(Source: Census data: ACS 2016 1-year, Census Bureau, 2016)*	-Rather young population (median age 27 years old). -Large majority of Hispanic population (over 50%), -Median household income (AMI) equals half of the L.A. AMI. -30% pop. below poverty line. -Median value of owner-occupied housing unit around $350,000.
Objectives	Get at the front of the systemic structural issues of capitalism (economic, social an environmental justice)
Mission	*"Stabilize the neighbourhoods of South of Downtown Los Angeles, transform the built environment and social conditions in South Los Angeles, encourage community building and economic opportunity."*
Governance	Membership organization, Tripartite governance, Board of Directors elected by members.
Operation	Monthly Neighbourhood Organization Committees (NOC), partnership with local authorities, local organizations and affordable housing developers.
CLT members features	-Between 70-100 members. -Membership process includes: meeting with staff, $25 annual fees, attendance to general meetings and 3 hours community service a month.
CLT assets	-1 community space -5 housing units built -319 housing units planned or under construction
Parallel activities	-Developing mobility and recreation activities -Advocacy campaigning -Leadership development

Bethune Library
55 units

Rolland Curtis Garden (2018)
144 units, commerces
Rental Scheme

Mosaic Multi-Family Prgm.
5 units
Collective Ownership

Slausson & Wall Village (2020)
120 units, Com. center, Park
Rental Scheme

Dowtown LA

USC

Exposition
Park

Downtown LA

West Washington Boulevard

West Slauson Avenue

W Gage Avenue

Real Estate Pressure Factors

High development zones
Exposition Metro Line
Blue Metro Line
Metro Station

CLT Assets

CLT Boundaries

Project State
Standby, underway, completed

Headquaters

0   1 km   2 km
0   0.62 mi   1.24 mi

Trust South LA members
(Credit: intersectionssouthla.or g)

Trust South LA campaign
(Credit: wavenewspapers.com)

Transformation of an intersection
(Credit: http://lagreatstreets.org)

Trust South LA headquaters
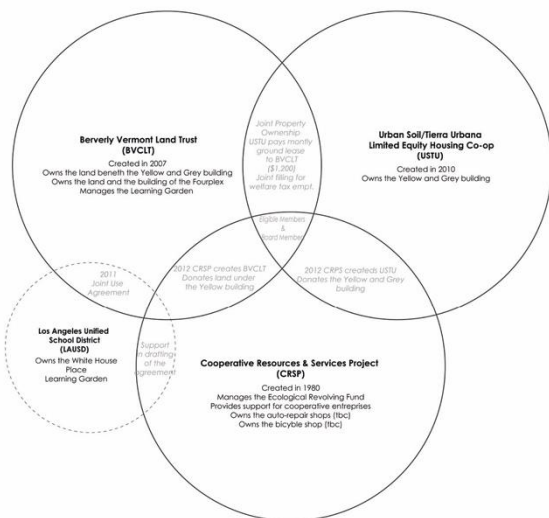*(Credit: Diane Pialucha)*

Mural Painting on Trust South LA headquaters
(Credit: Diane Pialucha)

Insite the Trust South LA headquaters
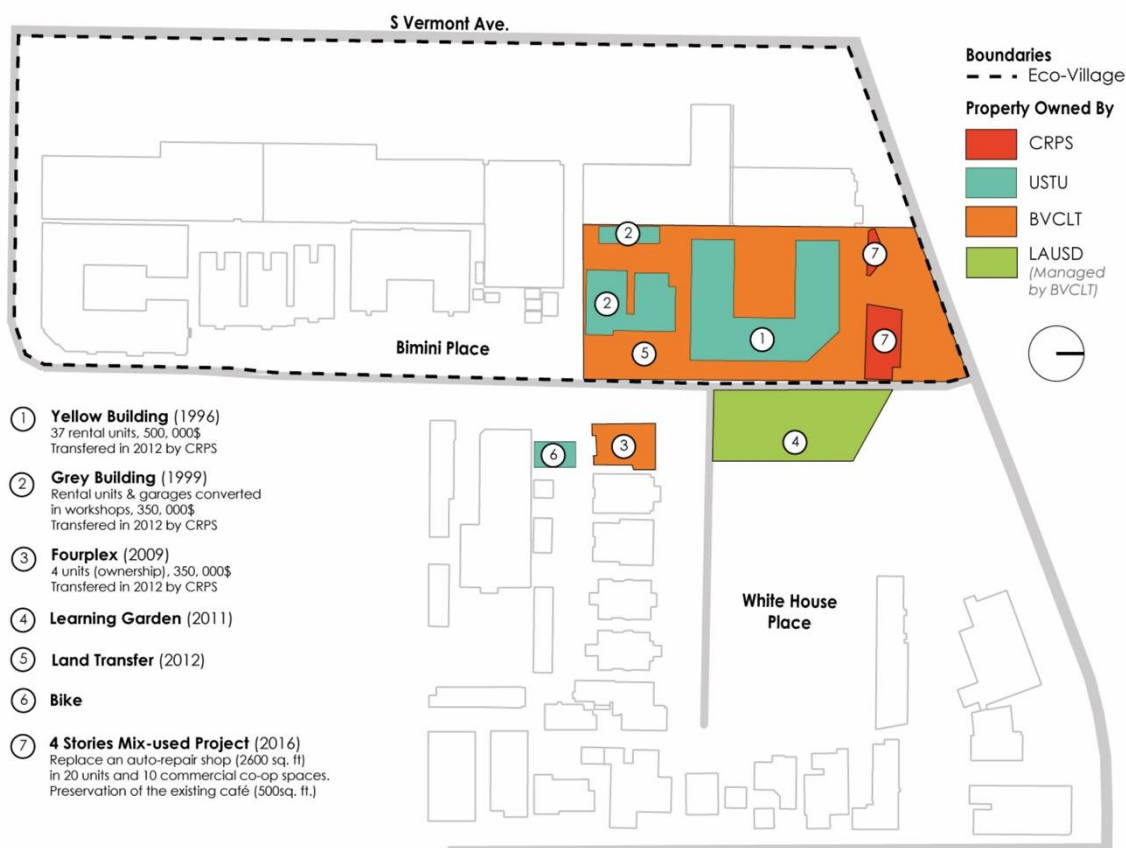*(Credit: Diane Pialucha)*

	Los Angeles Eco-Village
Localisation	Koreatown, Los Angeles, California, United States
Date of creation	1980: Cooperative Resources & Services Project (CRSP) 1993: Creation of the Eco-Village (LAEV) 2007: Beverly Vermont Community Land Trust (BVCLT) 2010: The Urban Soil/Tierra Urbana Limited Equity Housing Co-op (USTU)
Context of creation	1992 Los Angeles civil unrest
CLT boundaries	-Eco-Village Boundaries: 2 blocks between Vermont bd. and W1st/ 2d St, -BVCLT Boundaries: 1-mile radius from the Beverley/Vermont, red line metro station -USTU boundaries: limited to acquired buildings
Legal structure	-3 non-profits (501c3) -LAEV has no legal status
Population target	-Eco-Village population target: intentional community willing to take part in the ecological demonstration project, -USTU population target: residents that are part of the intentional community -BVCLT population target: population residing within the 1-mile radius
Neighbourhood features: **Central/ Koreatown (District 13)** *(Source: Census data: ACS 2016 1-year, Census Bureau, 2016)*	-Median age: 35 -AMI :3/5 of L.A. average -20% pop. poverty line -Median property value $544,000 -Hispanic and Asian minorities
Objectives	-LAEV: Demonstrating an alternative ecological model of community living in an urban area -CRSP: Developing the Los Angeles Eco-Village demonstration neighbourhood and support cooperative projects -USTU: Developing cooperative homeownership -BVCLT: Withdrawing land from the market
Mission	-LAEV: Environmental and economic sustainability -CRSP: Supporting the development of cooperative activities and ecologically sustainable neighbourhoods -USTU: Provide permanently affordable housing for very low to moderate income households -BVCLT: Create permanently affordable housing for low to moderate income households
Governance	-CRSP: *n.a.* -USTU: Cooperative governance, weekly meetings and specific working groups -BVCLT: Tripartite governance, membership organization
Operation	-Autonomous: relies on donations, a revolving fund capitalized by members and DIY practices.
CLT members features	-LAEV members: low to moderate income, shared ideal of environmental sustainability, involvement in the community, -/- 100 members -CRSP: about 1300 members -USTU: +/- 50 members -BVCLT: *n.a.*
CLT assets	-41 housing units, 1 bike shop, 1 learning garden -1 mixed-used project (20 units and 10 commercial spaces)
Parallel activities	-Diffusion of the eco-village model through weekly tours -Economic activities developed within the eco-village: bike kitchen, food lobby, café, etc.

Trust South LA members
(Credit: intersectionssouthla.og)

Trust South LA members
(Credit: intersectionssouthla.og)

Real Estate Pressure Factors
- High development zones
- Line Metro Line
- Metro Station

CLT Assets
- BVCLT Boundaries
- Eco-Village Boundaries
- Project State: In project, completed

S Vermont Ave.

Bimini Place

White House Place

Boundaries
- – – Eco-Village

Property Owned By
- CRPS
- USTU
- BVCLT
- LAUSD *(Managed by BVCLT)*

① **Yellow Building** (1996)
37 rental units, 500, 000$
Transfered in 2012 by CRPS

② **Grey Building** (1999)
Rental units & garages converted
in workshops, 350, 000$
Transfered in 2012 by CRPS

③ **Fourplex** (2009)
4 units (ownership), 350, 000$
Transfered in 2012 by CRPS

④ **Learning Garden** (2011)

⑤ **Land Transfer** (2012)

⑥ **Bike**

⑦ **4 Stories Mix-used Project** (2016)
Replace an auto-repair shop (2600 sq. ft)
in 20 units and 10 commercial co-op spaces.
Preservation of the existing café (500sq. ft.)

Trust South LA members
(Credit: intersectionssouthla.og)

Entrance of the Eco-Village
(Credit: Diane Pialucha)

Street activities
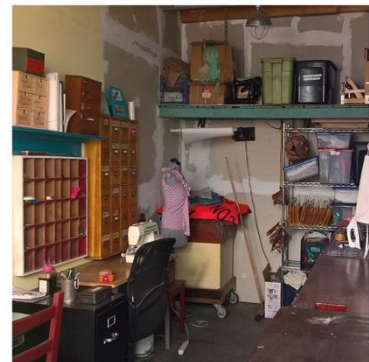*(Credit: laecovillage.org)*

Inner Garden of the Eco-Village
(Credit: Diane Pialucha)

Solar oven in the courtyard
(Credit: Diane Pialucha)

LAEV tool shop
(Credit: Diane Pialucha)

LAEV sewing workshop
(Credit: Diane Pialucha)
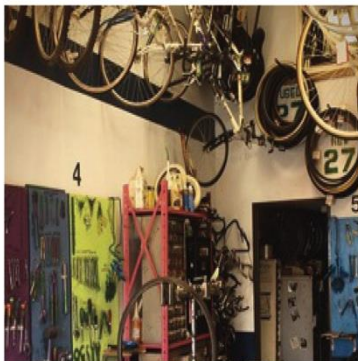
The Bike Kitchen by Jimmy Lizama
(Credit: laecovillage.org)

The Food Lobby
(Credit: laecovillage.org)

Vegetable garden
(Credit: Diane Pialucha)

The Learning Garden
(Credit: Diane Pialucha)

The community room
(Credit: Diane Pialucha)

26th birthday of the Eco-Village
(Credit: laecovillage.org)

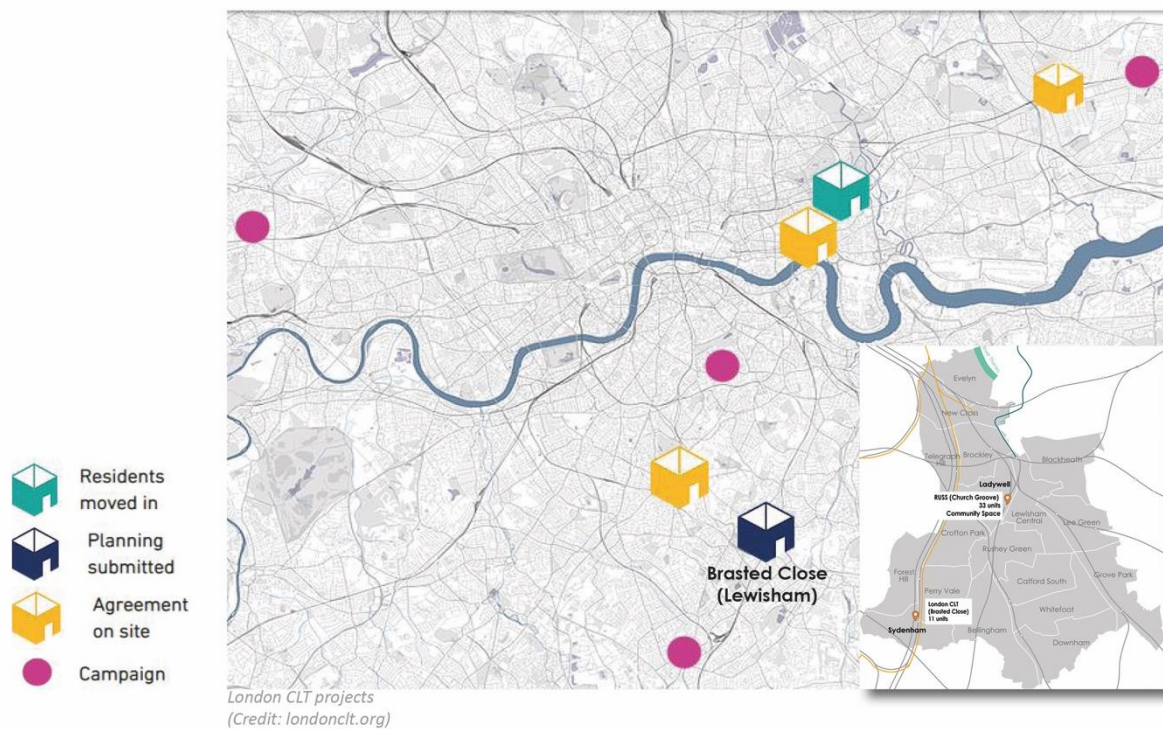|	London CLT (UK)
Localisation	Greater London Authority (GLA)
Date of creation	2007
Context of creation	2004: Citizen UK secure a promise of a CLT as part of the Olympics legacy 2005: Citizen UK are required by the Greater London Authority (GLA) to set a CLT pilot 2007: Citizen UK sets up the East London CLT (to become London CLT). 2013-2018: Implementation of the St Clements pilot project. 2015-2016: Expansion across London 2014: Beginning of the campaign in Lewisham
CLT boundaries	Greater London Authority (GLA)
Legal structure	Community Benefit Society
Population target	-Modest to middle income households: Closing the gap between "*people qualifying for council property and the people who can afford to buy their own home*" (SHICC, 2018) -Usually equivalent to median income at the Borough level
Neighbourhood features: Lewisham Borough (Sydenham Ward) *(londondatastore, 2017)*	-41% ethnic minority -median housing price (2014): £350,000 -median household income: £37,000
Objectives	Fight housing price increase and implement local democracy
Mission	Providing genuinely affordable homes tight to income and develop cohesive community
Governance	-Tripartite but Deconcentrated governance based on local branches at the Borough level. -Head office to bring technical assistance to already organized groups
Operation	-London CLT operates upon demand in local communities to support developing projects (building permit, raising finance, allocating homes, etc.) -Pressure Local Authorities to access land through campaigns
CLT members features	-About 3,050 members (130 stakeholder members, 2,780 community members, 40 resident members) -Membership is open to anyone living in London for £1 share.
CLT assets	- 1 realized project (St Clements: 23 units) - 1 project with planning permission (Lewisham: 11 units) - 3 written agreements to include CLT homes on site (78 homes) - 9 active campaigns
Parallel activities	-Advocacy campaign -Capacity building

Residents moved in
Planning submitted
Agreement on site
Campaign

Brasted Close (Lewisham)

London CLT projects
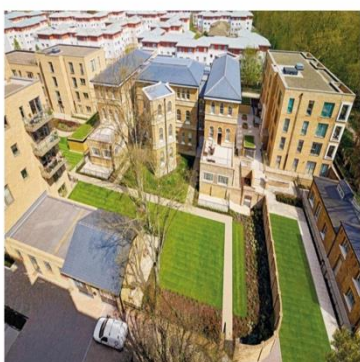(Credit: londonclt.org)

London Citizens campaign, 2013
(Credit: londonclt.org)

Commitment of the Greater London Authority
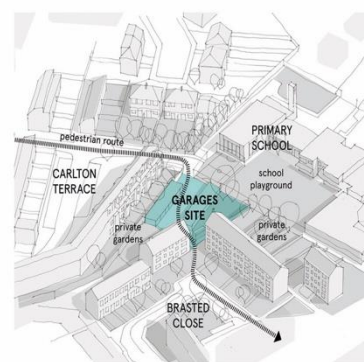(Credit: ethex.co.uk)

Campaigning in Shadwell
(Credit: londonclt.org)

St Clement's pilot project, Towers of Hamlet
(Credit: londonclt.org)

Brasted Close 3D model, Lewisham
(Credit: communityledhousing.london)

Brasted Close project, Lewisham
(Credit: archio.co.uk)

Rural Urban Synthesis Society (RUSS)	
Localisation	Lewisham Borough, London
Date of creation	2009
Context of creation	1980's: Walter Segal anarchist experiment of self-built community-led housing. "*RUSS is building on this legacy replicating and updating the model for the 21st century*" (RUSS, 2018)
CLT boundaries	-Project scale -To be replicated in London and across the UK
Legal structure	Community Benefit Society
Population target	Londoners with modest income
Neighbourhood features: Lewisham (Ladywell) *(londondatastore, 2017)*	-Median age: 33 -45% ethnic minority -Median housing sale price: £359,950 (2014)
Objectives	Creating sustainable community-led neighbourhoods and truly affordable homes right across London.
Mission	Reduce our communities' dependence on fossil fuels, increase food security, encourage biodiversity and provide affordable housing for Londoners
Governance	-Volunteer-run CLT -£1 share membership, -Board of Directors elected by its members
Operation	-Self-built practices -Partners Local Authorities to access land through campaigns
CLT members features	600-700 members
CLT assets	-33 housing units (Church Grove under construction) -1 community centre (under study)
Parallel activities	-School of Community-Led Housing, -Establishing pilot community hub on Lewisham, -Food growing on Lewisham site, -Community art projects.

Walter Segal self-built experiment, 1980s
(Credit: lewishamhomes.org.uk)

Walter Segal self-built homes today
(Credit: regenerationsociety.org)

RUSS self-builders
(Credit: theruss.org)

Church Grove project
(Credit: sambrown.info)
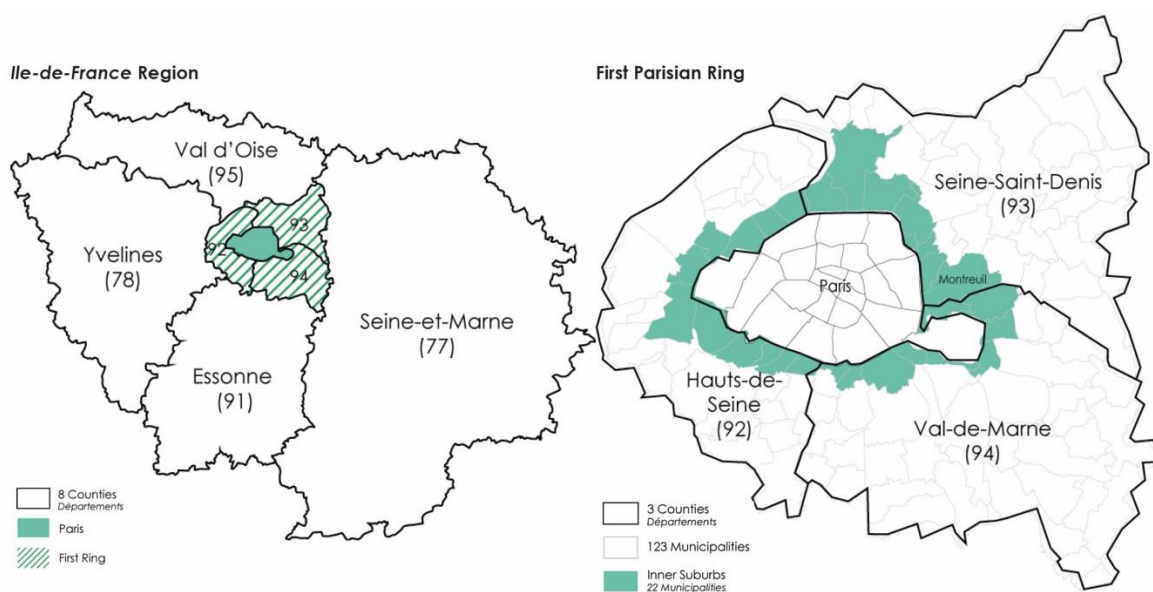

Church Grove project
(Credit: localagenda.co.uk)
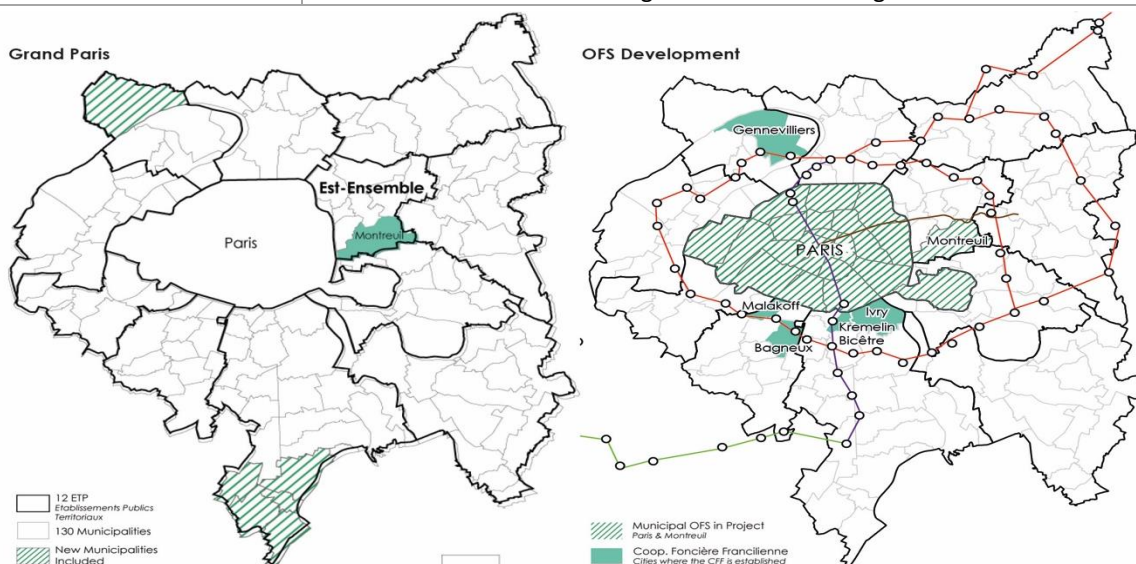

Ladywell self-built community space
(Credit: theruss.org)

	OFS Project in Montreuil
Montreuil.fr	
Localisation	Montreuil City (Seine Saint-Denis)
Date of creation	In standby since 2017
Context of creation	Gentrification and real estate pressure
CLT boundaries	Several options considered: project scale, city scale, joining the regional CFF OFS, developing and OFS at the EPT scale
Legal structure	*n.a.*
Population target	-Modest income households residing in Montreuil -Probably under PSLA ceilings
City features *(source: insee, comparateur de territoires, 2014)*	-Average sale prices 5000-7000€ per sqm² -Unemployment: 17.9% (2019) -Poverty rate: 27% (2014)
Objectives	To be defined: support participative housing, fight gentrification, foster social homeownership in tense or deteriorated areas, etc.
Mission	*n.a.*
Governance	*n.a.*
Operation	Based on traditional schemes of affordable housing provision. Probably on Municipal land for pilot projects
CLT members features	*n.a.*
CLT assets	1 pre-feasibility study realized
Parallel activities	*n.a.*

LA COOPERATIVE FONCIERE FRANCILIENNE	**Coopérative Foncière Francilienne (CFF)**

Localisation	Parisian First Ring
Date of creation	July 2017
Context of creation	The *Fédération HLM Coop* exists since 1908 pursuing the mission of social homeownership. This mission becomes more difficult to pursue in a context of land prices rise as local governments are less keen on subsiding such operations. The *Fédération HLM Coop* has thus been active in pushing the OFS and BRS agenda in order to renew its activities and supported the creation of the *Coopérative Foncière Francilienne* in the *Île-de-France* region (Paris) as a pilot project.
CLT boundaries	Regional boundaries. This scope fitting the regional prefectoral accreditation and existing governance of the Coop HLM (CFF members).
Legal structure	The Organisme Foncier Solidaire (OFS) is accredited by a Regional Prefect. CFF adopted a cooperative status (SCIC) following the Coop HLM governance (CFF members).
Population target	-Intermediate income households, first-time buyers, coming from the social rental housing market -Income ceiling based on the PSLA: €31,999 per year for a single person in Paris (Zone A, 2018) -2-17% difference between the required income to access OFS homes compared to previous social homeownership policy (PSLA) -10-18% difference in monthly repayment estimations compared to the private market
Neighbourhood features: **First Parisian Ring**	-Between 4000-8000€ per sqm² -High disparities, but high attractiveness, notably due to the development of a new transportation network as part of the Grand Paris Metropolis. -Unemployment: 12-18% (source: CIGPC - Cellule études, Insee, 2011).
Objectives	Developing a tool to foster social homeownership in the First Parisian Ring
Mission	Producing housing at a moderate price for moderate income households
Governance	-Cooperative Governance divided in 3 committee (founding members, local authorities, and inhabitant committee) -One member has one voice in the decision-making process
Operation	Based on traditional schemes of affordable housing provision. Relies on partnership with local authorities for access to land and guarantees, and on public banks (CDC) for concessional loans
OFS members features	-13 Coop HLM - 7 Municipalities - 2 sectoral agencies
CLT assets	-Under construction: Gennevilliers (14 units), Bagneux (38 units), Kremlin-Bicêtre (10 BRS units) -Under study: Malakoff, Ivry-Sur-Seine.
Parallel activities	-Commercialization and management of the housing stock

2. Graphical Comparison of CLT and OFS Models

The diagrams below are the result of an attempt to graphically visualize the specificities of the different CLT and OFS models. They reflect the conclusions drawn in this dissertation regarding the influence of a triple constraint system on each of the six parameters defining the model (what, what for, for whom, scope, governance, operation).
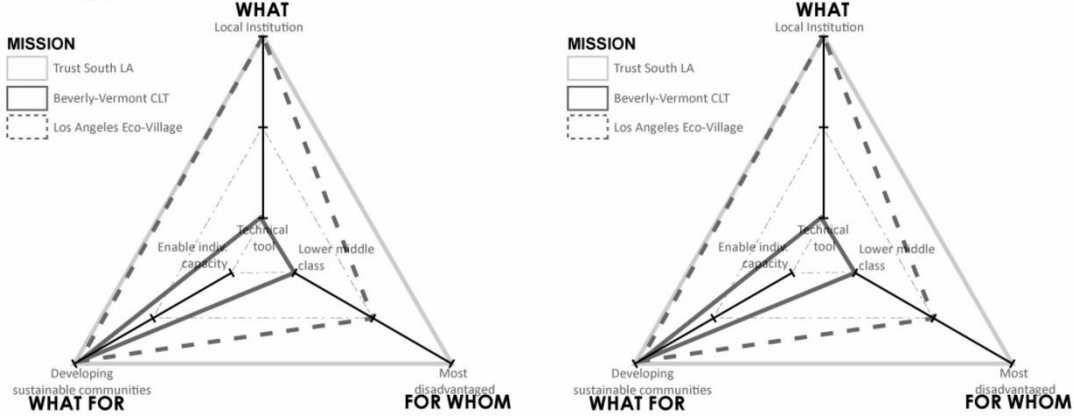

TEMPLATE: MODELING THE SIX CLT RULES
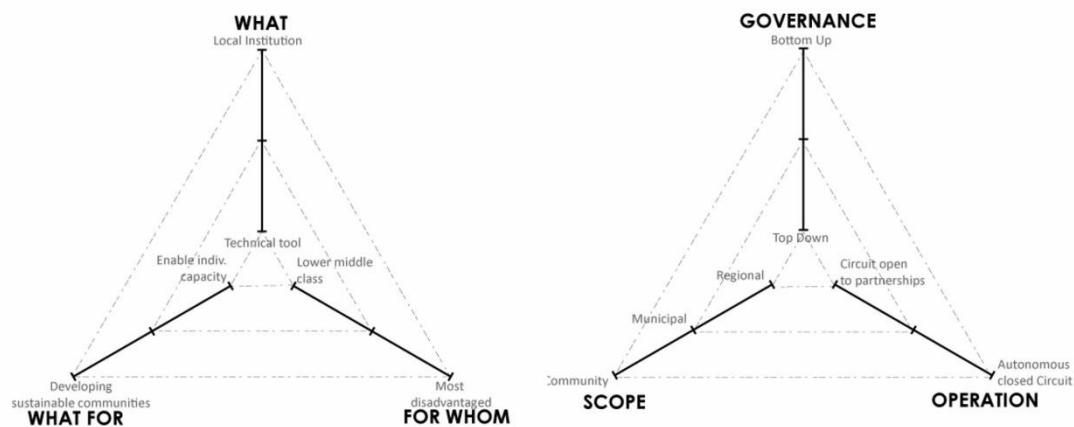
NATIONAL MODELS

LOS ANGELES

WHAT
Local Institution

MISSION
Trust South LA
Beverly-Vermont CLT
Los Angeles Eco-Village

Technical tool
Enable indiv. capacity
Lower middle class

Developing sustainable communities
WHAT FOR
Most disadvantaged
FOR WHOM

WHAT
Local Institution

MISSION
Trust South LA
Beverly-Vermont CLT
Los Angeles Eco-Village

Technical tool
Enable indiv. capacity
Lower middle class

Developing sustainable communities
WHAT FOR
Most disadvantaged
FOR WHOM

LONDON

WHAT
Local Institution

MISSION
Rural Urban Synthesis Society
London CLT

Technical tool
Enable indiv. capacity
Lower middle class

Developing sustainable communities
WHAT FOR
Most disadvantaged
FOR WHOM

GOVERNANCE
Bottom Up

STRUCTURING
Rural Urban Synthesis Society
London CLT

Top Down
Regional
Circuit open to partnerships
Municipal

Community
SCOPE
Autonomous closed Circuit
OPERATION

PARIS

WHAT
Local Institution

MISSION
Montreuil
Coopérative Foncière Francilienne (CFF)

Technical tool
Enable indiv. capacity
Lower middle class

Developing sustainable communities
WHAT FOR
Most disadvantaged
FOR WHOM

GOVERNANCE
Bottom Up

STRUCTURING
Montreuil
Coopérative Foncière Francilienne (CFF)

Top Down
Regional
Circuit open to partnerships
Municipal

Community
SCOPE
Autonomous closed Circuit
OPERATION

3. List of Interviewees

	Name	Function	Organization	Interview Date
LOS ANGELES				
1	Oscar MONGE	Environmental Planning Associate	T.R.U.S.T. South LA	11-20-2017
2	Sandra MCNEILL	Former CEO	T.R.U.S.T. South LA	11-27-2017 (lecture)
3	Los ARKIN	President	CRPS	11-24-2017
4	Helen CAMPBELL	Secretary	BVCLT	12-07-2017
5	Malcolm HARRIS	Director of Programs & Organizing	T.R.U.S.T. South LA	12-02-2017 (conference)
6	Jimmy LIZAMA	Member	USTU Housing Co-op	01-05-2017
PARIS				
7	Christian CHEVÉ	President	*Coopérative Foncière Francilienne (CFF)*	01-17-2017
8	Vincent LOURIER	President	*Fédération HLM Coop*	02-23-2018
9	Florence CAUME	Project Manager	*Fédération HLM Coop*	02-23-2018
10	Anne-Katrin LE DOEUFF	Director	*Espacité*	03-01-2018
11	Romain PARIS	Director	*Direction de l'Urbanisme et de l'Habitat, Ville de Montreuil*	01-10-2018
LONDON				
12	Hannah Emery-Write	Membership & Stewardship Manager	London CLT	02-26-2017
13	Lianna Etkind	Campaign Manager	London CLT	02-26-2017
14	Dave Smith	External Affairs Manager	National Housing Federation (Former Head of LCLT)	02-27-2017
15	Stephen HILL	Fellow	Winston Churchill Memorial Trust UK	02-27-2017
16	Catherine Harrington	Head	UK CLT Network	02-28-2017

4. Interview Guideline

PART 1: Presentation
This professional dissertation is conducted within the framework of my master degree at the Sciences Po's Urban School. I am in parallel, doing an internship within FMDV where I'm working on the development of a CLT network across Europe. In that framework, I am leading a comparative research on CLT in Los Angeles, London and Paris trying to disentangle the impact of national and local contexts on their mission and structuring.

PART 2: Core questions
a. National Frame
- What was the genesis of the CLT/OFS creation in US/UK/FR? (Problem faced, actors involved etc.)
- When and how has it been legally formalized? (Who pushed the agenda? What repercussions? What framework?)
- To what extend does this definition sticks to the original CLT definition as built by US advocates?
- How does this formulation relate to /illustrate the national public policy culture? (Housing, CLH, community development etc.)
- What did this definition enable in terms of political and financial support?

b. Metropolitan Frame
- What are the main urban challenges faced in Los Angeles/London/Paris in terms of housing, community development and provision of services? How did they evolve?
- How is the urban governance structured to answer these issues?
- How are CLT/OFS positioned to answer these issues? (Complimentary, filling a gap service etc.)
- What is the CLT/OFS relationship with local public officials?

c. Individual Frame
- What was the context motivating the creation of the CLT/OFS? (Disruptive event or development legal framework)
- How were the missions and goals set? What are they?
- In terms of structuring and operation: what type of organization is it? What is the scope of intervention? How have the boundaries been defined? What is the population target? What is the mode of governance chosen? How many assets? What complementary activities?
- On what resources do you rely on?
- What is your strategy of development?
- To what extend has your missions and structuring has been influenced by the local/national framework?

PART III: Additional questions
- How do you position yourself in regards of the US CLT model/other CLH experiments?
- Would you say it exist an international CLT model? If yes, what would it be?

Conclusion
- Leading a SWOT Analysis.

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