

A home in Apeldoorn? The influence of factors on housing solutions for labour migrants

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Preface

In front of you lies my master's thesis, "A home in Apeldoorn? The influence of factors on housing solutions for labour migrants." This thesis was written as part of the graduation requirements for the master's program in Spatial Planning, Land and Real Estate Development at the Radboud University in Nijmegen. During the recent period, an in-depth examination of the complex issue of housing for labour migrants in Apeldoorn was undertaken. It is a highly topical subject, which made it even more interesting to immerse myself in. My choice for this topic stemmed from a personal interest in current spatial planning issues and the role that local governments, market parties, and other stakeholders play in this context. Moreover, the fact that this problem is highly relevant in my hometown of Apeldoorn further motivated me to conduct this research.

This study could not have been realised without the help and willingness of all the respondents I interviewed. Thanks to their valuable insights, experiences, and expertise, I am particularly satisfied with the results that emerged from this research. Finally, I would like to thank my thesis supervisor, particularly Mr. Iulian Barba Lata. Thanks in part to his substantive feedback and keen reflections throughout the writing of my research, I have come to where I am today. I would also like to thank my second reader, Mr. Klaas Kresse.

I hope that my research will make a valuable contribution to this society. I hope you will enjoy reading my thesis!

Jur Rouwenhorst

Nijmegen, June 2025

Summary

The Netherlands is increasingly dependent on labour migrants to fill jobs in sectors such as the meat industry, logistics, and agriculture. Despite their significant economic contributions, many labour migrants reside in housing conditions that scarcely meet humane standards. Violations in housing standards are insufficiently enforced, and municipalities struggle to implement effective policies to manage this issue. The municipality of Apeldoorn is no exception; recent incidents have further underlined the urgency of this problem.

This research explores the various contextual factors that influence the housing policy of the municipality of Apeldoorn regarding labour migrants. Due to the rapidly growing number of labour migrants, Apeldoorn experiences increasing pressure on its housing stock and rising tensions within the community concerning safety, liveability, and spatial planning.

In response to this problem, the following main research question was formulated:

“How do contextual factors influence the effectiveness of existing housing solutions for labour migrants in the municipality of Apeldoorn and in what ways do these factors determine the overall suitability of these solutions?”

To answer this question, twelve qualitative interviews were conducted with a wide range of stakeholders, each offering different perspectives on the issue. These include labour migrants themselves but also representatives of the municipality of Apeldoorn, policymakers, project developers, employers, and employment agencies. The findings were analysed using the Governance Network Theory and deepened by applying the accountability patterns framework.

The results show that the effectiveness of the current housing policy is hindered by fragmented governance, a lack of strategic vision, and insufficient collaboration among all relevant actors. Employers and employment agencies often shift the responsibility for housing onto municipalities, while municipalities, in turn, place responsibility on employers, as they are the ones bringing in the labour migrants. In addition, the policy instruments currently available to enforce quality standards remain rather limited.

This study concludes that the Municipality of Apeldoorn must move toward stronger cooperation with all actors; proactive policies will have to be implemented. Because exploitation, poor housing, and nuisance in the neighbourhood can only be solved if there is cooperation between the public domain, the private domain, and civil society.

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1 Introduction of the Research

1.1 Research problem statement

Europe faces shortages of staff and employees in many sectors (Michel and Ecartot, 2020). There are several reasons for this shortage, in which the ageing population plays a major role (Ministry of Justice and Security et al., 2021). To some extent, labour migration is a means of solving this problem. The employment of labour migrants has the potential to contribute to economic growth in Europe. Labour migration is an important part of total migration throughout Europe. Companies in healthcare, construction, and engineering often experience large labour shortages. The large-scale movement of labour migrants gained momentum following the creation of the European Economic Community (EEC) in 1957, which led to the signing of the Treaty of Rome (Goedings, 2007). This treaty incorporated the free movement of workers. Its main purpose was to limit member states' interference with the free movement of labour migrants.

The Netherlands also has a strong influx of labour migrants. The Netherlands has many labour migrants from Eastern Europe, such as Poland, Romania, and Bulgaria (Ministry of Social Affairs and Employment, 2023). An important driver for Dutch companies to hire labour migrants is their willingness to work at relatively low wages. Many labour migrants in the Netherlands earn only the minimum wage or sometimes just above it (Aanjaagteam Bescherming Arbeidsmigranten, 2020). Some employers take advantage of the vulnerable position of labour migrants by withholding part of their salary, for example, or by asking for very high rents in the case of poor housing.

The municipality of Apeldoorn also experiences an increase in the number of new labour migrants. Since 1999, 845 new labour migrants have come to live in Apeldoorn and have taken 290 family members (Klerks, 2024). This influx represents a significant demographic shift, as it means that approximately one of every thirteen new residents in this period was a labour migrant. Most of this group came from European countries, where people were free to move. Apeldoorn is also an important municipality for labour migrants in the province of Gelderland. At least 14% of all labour migrants work in this municipality (Decisio, 2022).

However, the integration of these foreign workers presents significant challenges for the municipality of Apeldoorn, particularly concerning housing. (Rutgers & Veeneman, 2024). The municipality is consequently seeking to gain more control over

the housing conditions of labour migrants. The management and oversight of large-scale housing locations for labour migrants require improved regulation. Currently, many labour migrants also stay at holiday parks; for example, Beekbergen, a village within the municipality of Apeldoorn, is a place where many labour migrants also stay at relatively cheaper holiday parks. The municipality of Apeldoorn is also busy searching for new ideas and opportunities (Kuipers, 2024). For instance, an increasing number of empty office buildings are becoming vacant, which might be transformed into rooms for labour migrants. The municipality wants to move away from holiday parks and single-room rentals because they reduce liveability, both for labour migrants and the residents themselves.

Publications regularly appear on the issue of labour migrants. For instance, the PVDA, a major national political party that is also represented in the municipality of Apeldoorn, is also concerned with the current conditions (Doljé, 2024). Political concerns were raised about the living conditions, with reports emerging of situations where nine labour migrants were allegedly housed in a single garage box. These conditions are extreme; however, an example of an event occurring in 2024 is in the municipality of Apeldoorn. It has been raised that labour migrants are deterring tourists from coming to holiday parks where labour migrants are currently living. Written parliamentary questions were also sent to the municipal executive to determine how the municipality of Apeldoorn viewed this (Stopler, 2024). The municipality itself has no insight into how many labour migrants live at holiday parks, and the municipality indicates that it does not have a specific policy against the living conditions of labour migrants but follows the general standards that apply to housing in general.

The urgency of this situation in Apeldoorn was tragically underscored in early 2024, when an argument between labour migrants at a holiday park resulted in a fatal stabbing (Rutgers & Veeneman, 2024). At Holiday Park De Kakelhof in Beekbergen, a stabbing incident occurred that resulted in one death. This involved an argument with labour migrants who were staying here illegally. Witnesses claimed that there had been a significant number of drugs, alcohol, and noise nuisances at this park for a long time due to the presence of labour migrants. Park owners claimed that some labour migrants were able to rotate between holiday parks by exploiting legal loopholes, effectively circumventing regulations. This situation demonstrates that a segment of the labour migrant population resides permanently in these parks, contrary to legal

stipulations. However, studies illustrate that this is hardly enforced; while legally, labour migrants are not allowed to live permanently, for example, in holiday parks (Van Der Krabben et al., 2014). Currently, the municipality of Apeldoorn is again in the news several times regarding this issue. In the recently published article by Veeneman and Rutgers (2025), it emerged that the problem has increased greatly in recent years. It is unknown how many labour migrants are staying illegally, and previous approaches and controls by the municipality have failed.

The municipality of Apeldoorn's search for new housing solutions is inherently complicated by the contextual factors that determine the effectiveness of any policy intervention (Dzieciuchowicz, 2009). In particular, the demand for cheap labour stimulates an increase in the number of labour migrants. However, there is a major shortage in the housing of labour migrants (Aanjaagteam Bescherming Arbeidsmigranten, 2020). Labour migrants face low incomes, and housing prices are relatively high. This means that the quality of living and housing conditions for labour migrants are often low.

To solve this problem, a comprehensive approach is required in the municipality of Apeldoorn. Many contextual factors must be reconsidered to arrive at a more effective policy regarding the housing policy for labour migrants. In the future, targeted adjustments are required to increase the effectiveness of housing issues.

1.2 Research aim and research question(s)

This study examines how contextual factors influence the effectiveness of housing solutions for labour migrants in Apeldoorn. Effectiveness depends on several contextual factors (Healey, 1997). Housing for labour migrants is more than just providing accommodation. It is also about integrating itself well within the social framework of Dutch culture (Sampson et al., 2010). Contextual factors must be identified and analysed. It is also important to determine the current policy regarding the housing of labour migrants in Apeldoorn. Labour migrants are an important branch of the labour market. However, a solution must be found for the poor housing conditions. The municipality of Apeldoorn is tasked with strengthening social cohesion, increasing economic stability, and contributing to sustainable community development. The municipality's current policies must be examined critically. Based on the outcomes, findings and recommendations were made to improve the housing policy of the municipality of Apeldoorn.

The main question linked to the research objective is the following:

Research question

‘How do contextual factors influence the effectiveness of existing housing solutions for labour migrants in the municipality of Apeldoorn and in what ways do these factors determine the overall suitability of these solutions?’

The following sub-questions are linked to the main question of this study:

Sub-questions

1. What are the main contextual factors shaping housing conditions for labour migrants in the municipality of Apeldoorn?
2. How do policy frameworks and governance structures in Apeldoorn influence the provision and management of housing for labour migrants?
3. What are the experiences and perceptions of labour migrants regarding their housing situation in Apeldoorn?
4. What possible policy adjustments and improvements could contribute to more sustainable and effective housing solutions for labour migrants in Apeldoorn?

1.3 Scientific relevance

As mentioned earlier, housing issues are central to the framework of this study. Studies on housing and labour migration are scientifically relevant to issues related to spatial planning, economic development, and social integration. For instance, integrated analyses of contextual dimensions within housing issues of labour migrants have not yet been conducted within the municipality of Apeldoorn.

While previous studies have explored housing for labour migrants, they often focus on a limited set of factors. For instance, Opreë (2012) conducted a study on the housing situation of migrants and how they valued it, focusing mainly on social capital and their residence intention. This study, for example, focuses primarily on labour migrants’ perceptions and largely overlooks the role of municipal policy interventions in shaping the effectiveness of housing solutions.

Another similar academic study by Verburg (2012) focuses on different housing forms and factors that determine where labour migrants come to live. Similarly, this study lacks a focus on the policy implications of different housing forms and how these

solutions can affect economic stability. This research can therefore bridge this gap by not only describing housing forms but also by analysing the factors that influence the impact of social cohesion and other contextual factors specific to the Apeldoorn municipality policy.

Finally, Van Der Klis (2015) addresses the knowledge level of municipalities regarding the housing of labour migrants and analyses whether the size of a municipality influences this. This study addresses the knowledge levels of municipalities, but not specific policy interventions, and how they can influence the effectiveness of housing solutions. The research focuses on Apeldoorn because the municipality is very often in the news regarding this issue, and there is a lot of illegal habitation and nuisance in the neighbourhood (Veeneman & Rutgers, 2025). It offers insight into how policy and practice come together in a medium-sized municipality. Thus, this study can serve as a case study for similar municipalities.

According to Scharwächter and Dingemarsen (2024), a study is scientifically relevant if it fills a gap in existing literature, contributes to existing literature, or introduces a new perspective on the topic. As already described above, this research builds on existing results and provides a new perspective on the housing of labour migrants, namely that of the municipality of Apeldoorn. The study by Blauw (2023) deals with the municipality of Apeldoorn, but in this study, the researcher mainly looked at housing options in industrial estates. That study, however, gives limited attention to contextual factors and does not offer a comparative analysis of the effectiveness of different approaches.

Previous studies on labour migrant housing have not examined the interplay of governance networks and accountability patterns in a smaller city context; this thesis extends those theories to a new empirical setting, revealing how fragmentation at the municipal level can hinder policy effectiveness.

1.4 Societal relevance

The housing crisis for labour migrants is an urgent problem within the municipality of Apeldoorn, but this problem is also reflected at the national level. For instance, Sobczyk-Turek et al. (2023) argue that labour migrants have had more negative experiences regarding their housing situations in the past two years. This local research can contribute to a broader understanding of the problem that also exists elsewhere. Labour migrants play a major role in various sectors in the Netherlands. Their

contribution to society is often underexposed, which causes tensions within local communities as well as affecting the well-being of these labour migrants.

Research has also illustrated that labour migrants consider housing to be the most negative aspect of their stay in the Netherlands (Sobczyk-Turek et al., 2023). This represents an increase of 9% compared to two years ago. There is often a lack of privacy and poor facilities, leading to stress and health problems among labour migrants.

As Rutgers and Veeneman (2024) pointed out earlier, this problem also occurs in Apeldoorn. The increasing number of labour migrants leads to pressure on the housing market, and recreational parks, or rooming houses, are mostly used for housing, resulting in unsafe situations. A poignant example was the fatal stabbing at 'Park de Kakelhof,' which also highlights the urgency of this investigation. The municipality of Apeldoorn sees that this must change and is struggling to create the right housing policy (Kuipers, 2024). The municipality is considering several options as alternatives, but in each case, no clear solutions are visible.

Not only are housing issues raised here, but they also hurt social cohesion and economic stability. Overcrowding and illegal occupancy by labour migrants put pressure on the security of neighbourhoods and municipalities (Van Hal, 2024).

The core problem this thesis addresses is the lack of effective housing solutions for labour migrants in Apeldoorn, potentially caused by various contextual factors and governance challenges. The theme is partly due to all the above-mentioned societal relevance, with a specific focus on the municipality of Apeldoorn. The municipality of Apeldoorn and similar municipalities can use these insights to improve policy. Labour migrant advocacy groups could leverage the findings to push for better conditions, and the research might inform national discussions. Given the persistent labour shortages in sectors like logistics and food processing (Aanjaagteam Bescherming Arbeidsmigranten, 2020), the availability of decent housing for labour migrants is not just a social concern but an economic necessity.

1.5 Reading Guide

The research consists of five chapters, followed by the references and the appendices. Chapter 1 introduces the research topic and outlines the societal and scientific relevance of the housing situation for labour migrants in the Netherlands. It also presents the central research question and sub-questions guiding this study. Chapter 2 presents the theoretical framework. It discusses the key academic debates

and concepts related to this subject, and it also gives the conceptual model used during this research. Chapter 3 describes the methodology. It explains the qualitative research design, including the choice of semi-structured interviews and document analysis. Furthermore, it describes the data collection process, the selected respondents, and the applied coding and analysis techniques. Chapter 4 presents the results and analysis. The findings are discussed in relation to the sub-questions and interpreted using the theoretical framework. This chapter identifies key patterns in institutional dynamics and actor strategies concerning housing provision for labour migrants in Apeldoorn. Chapter 5 discusses the results and answers the sub-questions based on the empirical insights and theoretical interpretation. This chapter also presents the recommendations. Chapter 6 presents conclusions regarding the main research question and provides critical reflections on the study's limitations. The reference list and appendices are included at the end of the thesis.

2 Literature Review and Theoretical Framework

Chapter Two defines the theoretical foundation of this study. The literature concerning the three main issues of this research will be discussed. Labour migration, housing, and policy factors are the three features examined in more detail. This chapter builds the theoretical foundation for the research. It starts with a comprehensive overview of the relevant literature, then narrows its focus to the specific theoretical frameworks guiding this study. Finally, it operationalises the core concepts, which form the basis of the conceptual model presented in the subsequent methodology chapter.

2.1 Labour Migrants

2.1.1 Definition

The term ‘labour migrant’ is a broad concept. According to the UWV (Employee Insurance Administration Agency), the term has a definition of “someone who migrates to another country intending to work there” (UWV Directorate of Enforcement, 2015), as well as a narrower definition of “Someone who migrates to another country to perform work there temporarily” (UWV Directorate of Enforcement, 2015). The word ‘temporary’ is particularly important here. During the study, it is important to discuss labour migrants who are here temporarily; otherwise, they are no longer labour migrants.

Engbersen (2013) further describes in more detail the residence times of labour migrants and how they can be categorised. He describes labour migrants in the following three categories:

1. Short stay: frequent seasonal workers. These labour migrants stay for a few months to one year; the focus is on earning money and sending it back to their home countries;
2. Medium stay: labour migrants who stay between one and five years. These labour migrants often have technical occupations and maintain ties with both the home country and the local population. Most also have a reasonable command of the Dutch language;
3. Long-term residence: labour migrants who stay in the Netherlands for five years or more and often intend to stay in the Netherlands. These people are fully integrated into society and are often employed in higher-skilled work fields.

Often, these types of labour migrants also have children in the Netherlands, which ensures bonding with the country (Engbersen, 2013).

During the research, the short-stay labour migrants are mainly examined because the long-stay labour migrants are integrating into Dutch society and because they also participate in registrations at, for example, housing properties within the regular housing supply instead of the temporary stays (Van Der Heijden et al., 2013).

2.1.2 Migration motives

There are several factors why labour migrants move to other countries. Lee’s (1966) theory is an important theory that explains this. In it, Lee (1966) explains the so-called ‘push-pull theory.’ Push factors are circumstances in which a migrant decides to leave their home or country. This always relates to the country in which a person migrates. Examples include poor working conditions, low income, and political persecution. On the other hand, pull factors exist; these factors ‘attract’ the migrant to come to that country (Lee, 1996). Examples are the opposite, for example, good working conditions, higher wages, and many freedoms. Applying this theory to labour migrants, it is possible to investigate what housing preferences labour migrants have and what factors, if any, influence this choice.

2.1.3 Housing trajectories of labour migrants

Housing trajectories can vary greatly among labour migrants in Europe. Manting et al. (2022) found that more than half of labour migrants stay in the Netherlands only temporarily. The research has revealed several housing trajectories and found that 32% of the population quickly returns to their home country. Figure 1 illustrates how the housing trajectories are distributed.

Table 1. Housing trajectories of migrants in 8 clusters, 2012–2019.

	<i>Cluster</i>	<i>N</i>	<i>%</i>
<i>Private renting to return migration</i>	1	1.317	11
<i>Transitions into social housing</i>	2	1.201	10
<i>From sharing to private renting</i>	3	1.258	10
<i>Quick return migration</i>	4	3.858	32
<i>Transition into homeownership</i>	5	879	7
<i>Long-term sharing</i>	6	1.279	11
<i>From sharing to return migration</i>	7	1.496	13
<i>Long-term homeownership</i>	8	653	6
<i>Total</i>		11.941	100

Figure 1: Housing trajectories of migrants (Manting, 2022).

Shared housing is a common way of housing labour migrants. This is also because of economic disadvantages and job insecurity. Often, this shared housing is only for a short time, but some poorly paid labour migrants will stay here permanently because they simply cannot rent or pay for their housing. What can also be seen from the study by Manting et al. (2022) is that age, income, migration motives, and family composition strongly influence housing trajectories. For instance, Bulgarian or Polish migrants stay longer in shared housing, and Western and Southern European labour migrants more often choose social renting in the Netherlands. The results indicate that housing policy for labour migration requires flexible solutions, considering the nature of migration.

Thus, Manting et al. (2022) confirmed that, by far, the largest group starts with private or shared rent and, likely, will soon leave the Netherlands again. This often occurs because of economic uncertainty and poor housing conditions. The second largest group (17%) of labour migrants eventually moved on to owner-occupied housing, which is often accompanied by strong social cohesion and good income. The other three groups are labour migrants who move from social or private renting to more precarious or long-term private renting. By far, the smallest group of labour migrants (2.2%) remain in informal accommodations such as holiday parks or industrial estates for long periods (Loomans, 2023).

2.1.4 Housing for labour migrants

Labour migrants' housing presents a challenging problem (Loomans, 2023). The direct effects of housing circumstances can be on their safety and well-being. Inadequate control might result in unstable living conditions and exploitation hazards (Ernst et al., 2021). Emphasising issues including physical housing conditions and protection against discrimination and rental exploitation, frameworks from the United Nations and the International Labour Organisation (ILO) offer principles for suitable housing at the global level. Nevertheless, national governments' application of these rules determines the degree of protection, thereby producing differences.

Policy varies greatly at the municipal and national levels in terms of legal frameworks, fullness of standards, monitoring, and execution. Although national rules usually define baseline standards and assign responsibility for housing, numerous location-specific solutions are still required, and municipal policy still suffers from gaps. Apart from government engagement, the corporate sector also contributes, for instance, by means of industrial associations and social certification programs.

Labour migrant accommodation takes several physical forms. On employer-owned land, there are subsidised homes, converted shipping containers, independently rented rooms or flats, and less traditional forms such as shacks and migrant-built structures worldwide. Along with different regulations, this variation emphasises the difficulties in guaranteeing sufficient and safe living conditions for every labour migrant (Ernst et al., 2021).

2.2 Contextual factors

2.2.1 Social factors

Many factors influence municipalities' policy choices regarding the housing of labour migrants. First, municipalities must always manage residents who are affected by the influence of accommodating labour migrants (Maney & Abraham, 2008). An important phenomenon linked to this is the NIMBY effect, the Not In My Backyard effect. Driscoll's (2013) theory further takes this into account. Municipalities always have movements within the city that oppose the establishment of unwanted facilities in the neighbourhood. This can be about environmental issues, but also certainly about housing labour migrants within 'their' city. The NIMBY effect highlights that residents may reject or oppose the accommodation of labour migrants. Residents may feel that housing labour migrants could lead to nuisance, low housing values, or a negative impact on social cohesion. Driscoll (2013) also cites that there is often a negative association in the framing of facility users; for example, homeless or labour migrants are seen as 'dangerous' by default. This social factor can certainly play a role in the decision-making process of the municipality of Apeldoorn regarding the housing of labour migrants. Labour migrants can sometimes be unfairly prejudiced. Finally, Driscoll (2013) emphasised that NIMBY movements should focus on finding solutions rather than directly putting down negative charges.

In addition to the fact that residents usually do not want labour migrants to live in the neighbourhood (Koenis, 2023), social cohesion is also often an issue. The social cohesion of labour migrants can be an important factor in decision-making within municipalities. In his Collective Efficacy Theory, Sampson et al. (2010) highlighted how social cohesion and integration play a crucial role in achieving shared goals. The theory addresses crime reduction, but can be placed in a broader perspective by addressing issues such as housing labour migrants. Indeed, the collective efficacy theory argues that social cohesion and trust between neighbourhood residents are

necessary to make something possible collectively. Collective efficacy originates from a sense of responsibility. If labour migrants themselves are also willing to get involved in the community, this will increase social cohesion in the neighbourhood. When labour migrants are involved in sports events or neighbourhood celebrations, it creates mutual understanding and acceptance. Increased social cohesion among labour migrants can be beneficial for the neighbourhood. This positive effect may be enhanced and could contribute to more flexible housing policies if the labour migrants also actively integrate into the local community.

2.2.2 Economic factors

Income can be seen as one of the main motives through which labour migrants have to make choices in the available housing options in the Netherlands. Those with slightly lower incomes are often stuck in social renting or insecure rental facilities such as holiday parks or business parks (Loomans, 2023).

Employers and employment agencies also respond to economic factors regarding the housing of labour migrants. For example, this year, a policy letter was submitted to address the withholding of rent from employment contracts (Dutch Second Chamber, 2025). For employment agencies, the demand for cheap labour often takes priority. Arranging housing for labour migrants can be seen as a primary cost that needs to be minimised. This can lead to offering poorer quality housing or higher payments demanded from the labour migrant (Smit, 2025).

Besides the labour migrants' need for a better income in the Netherlands, from which employment agencies may profit, there is also a general housing shortage in the Netherlands (Start, 2021). The housing shortage is expected to increase in the future, also affecting labour migrants.

2.2.3 Political-institutional factors

Municipalities in the Netherlands can introduce bans on renting out housing or accommodating labour migrants (Ministry of General Affairs, 2024). This is an example of how municipalities influence housing issues. Since 2024, political changes have also taken place. For instance, a new outline agreement has been formed by the new coalition, which also ensures changes in the factors at municipalities in the areas of labour migrant housing (National Government of the Netherlands, 2024). The coalition parties want more control over labour migration. The parties consider labour migrants necessary for entrepreneurs and the economy, but want the new policy to

remain critical about which labour migrants the Netherlands needs and what exactly is needed. There will be an assessment framework to determine whether labour migrants are needed for the establishment of new companies. Measures will also be taken against wages that are too low and poor living and working conditions. Rogue employment agencies will be dealt with more harshly, and employment agencies will be checked for this through the admission system (WTTA). The effective date of the WTTA is January 1, 2027, with enforcement from January 1, 2028 (Ministry of General Affairs, 2025). This already points to future institutional changes. Labour migrants outside the EU are required to apply for work permits, and EU labour migrants do not have to do so. In addition, employers of labour migrants will be responsible for the nuisance and costs of labour migrants when they do not have regular housing. Instead, municipalities are more likely to accept labour migrants who can house themselves on companies' sites (National Government of the Netherlands 2024).

2.3 The Roemer report

One of the most important foundations for writing this research on labour migrants and the associated housing issues is the report by the 'Aanjaagteam Bescherming Arbeidsmigranten,' led by Emiel Roemer. This report is hereafter referred to as the 'Roemer Report' (Aanjaagteam Bescherming Arbeidsmigranten, 2020).

Around the time of COVID-19, this task force increasingly discovered that the position of labour migrants in the Netherlands was alarming. The findings of this report had a significant impact on various policy measures in the Netherlands and served as a wake-up call for several municipalities, prompting them to take action to prevent abuses. Specific measures were also taken regarding housing. These recommendations are aimed at municipalities and governments to

Meer en betere huisvesting voor Arbeidsmigranten H4	
4.1.A	Inzicht in bestaande sturingsmogelijkheden
4.1.B	Invoering verhuurdersvergunning
4.1.C	Handhaving door gemeenten
4.2.A	Afspraken over de landelijke opgave en gemeentelijke opgave
4.2.B	Regionale deals voor meer huisvesting
4.2.C	Effectrapportage bij nieuwe bedrijvigheid
4.3.A	Integreer het SNF- en AKF-keurmerk
4.3.B	Overgang naar de nieuwe norm
4.3.C	Aangepaste oppervlakte norm in het Bouwbesluit
4.3.D	Geïntegreerd SNF/AKF keurmerk voor overige woonvormen
4.3.E	Samenwerking tussen gemeenten en keurmerken in de handhaving
4.4.A	Een zelfstandig huurcontract voor alle woonvormen
4.4.B	Ontkoppeling huur- en arbeidscontract op papier en in de praktijk

Figure 2: Key recommendations from the Roemer Report (Aanjaagteam Bescherming Arbeidsmigranten, 2020).

help prevent future abuses related to the housing of labour migrants. Based on the recommendations of the Aanjaagteam Bescherming Arbeidsmigranten (2020), several concrete actions are considered important. Rental contracts and employment contracts should be separated so that when a labour migrant loses their job, they do not automatically lose their housing as well. Additionally, municipalities should improve enforcement regarding the registration of new labour migrants and thereby strengthen oversight of housing locations. Furthermore, municipalities should work towards a policy that makes it mandatory to certify employment agencies. This will become mandatory from 2027 under the new law 'WTTA' (Ministry of General Affairs, 2025).

Finally, the Roemer Report states that municipalities should exercise greater control over employers and hold them more accountable for providing adequate housing. Municipalities must ensure a sufficient housing supply and proper facilitation. There should also be consideration for 24/7 on-site management at large housing locations to ensure safety.

The Ministry of Social Affairs and Employment of the Netherlands (2023) published a new report in 2023 to assess the effects of the original 2020 Roemer report. Positive developments have already taken place. For example, the 'Good Landlordship Act' has come into force, establishing nationwide basic standards for the quality of rental housing and the conduct of landlords. It also includes specific provisions relevant to labour migrants, such as the obligation to separate housing and employment contracts and to provide information about rights and obligations in a language the migrant understands.

In addition, the Environmental and Planning Act was amended in 2024, offering new opportunities for municipalities to set local standards for minimum living space per person per room (The Ministry of Social Affairs and Employment of the Netherlands, 2023). Kurvers et al. (2023) support municipalities with the guideline 'Impact Assessment for New Business Activity.' This guideline states that when new businesses are established, municipalities should make agreements with the entrepreneur in advance to gain insight into whether the company plans to employ labour migrants and whether arrangements can be made regarding where these labour migrants will be housed. This allows municipalities to have a clear understanding in advance of what will take place. For all the recommendations, see Figure 2.

2.4 The Governance Network Theory

The housing of labour migrants is a complex issue involving many actors. The Governance Network Theory (GNT) (Klijn & Koppenjan, 2012) provides an analytical framework to understand the dynamics of policymaking and implementation within various actor settings. The evolution of this theory can be seen in three phases. The first phase (1997) by Kickert, Klijn & Koppenjan laid the foundation with a focus on the management of 'policy networks'; this was followed by a consolidation phase in the 2000s where the term 'network governance' became more widespread. In the final phase, in 2012, Klijn and Koppenjan adopted the umbrella term 'Governance Network Theory' to define and reflect on the entire field.

2.4.1 Fundamentals

According to Klijn & Koppenjan's (2012) Governance Network Theory (GNT), governments' decisions and execution now mostly take place inside intricate networks of interdependent players. Public parties, business players, and civil society groups constitute these networks. No one actor or hierarchical control by itself can address society's challenges. Rather, policy processes develop inside networks of autonomous yet mutually dependent actors cooperating and aiming for common goals (Klijn & Koppenjan, 2016).

GNT focuses on public issues. Labour migration and the housing policies connected to it include many players in several spheres of government and at different levels. Every actor pursues different hobbies. Since no one actor has complete power, cooperation and negotiation become rather important (Klijn & Koppenjan, 2012). GNT emphasises the dynamics of this cooperation and how it might affect results as well as policy execution.

2.4.2 Key concepts and mechanisms

Central to GNT is the presence of various actors (Klijn & Koppenjan, 2000). All actors possess their own resources, such as money, knowledge, or authority, and are mutually dependent on each other. This interdependence gives rise to policy networks in which actors engage in frequent interaction and negotiation. This mutual dependence forces cooperation in which power and influence are distributed.

Besides hierarchical control (top-down) and market forces (price mechanism), a third coordination mechanism takes place within governance networks: horizontal coordination (Klijn & Koppenjan, 2004). This form of coordination is not based on

authority or prices. It focuses on the interaction between interdependent actors who negotiate to reach outcomes. Actors in these networks are autonomous but mutually dependent, which means that no single actor can unilaterally determine the outcome. Instead, actors must interact, negotiate, and align their strategies to develop and implement collective policies. Rather than acting solely on self-interest, actors consider mutual dependencies and attempt to shape outcomes that accommodate shared interests. The existence of interdependencies encourages actors to search for cooperation through strategic interaction, rather than relying on formal control (Klijn & Kloppenjan, 2004).

Governance networks are integrated into institutional contexts (Klijn & Kloppenjan, 2004). These consist of formal rules and knowledge and have their own norms and routines. These rules of the game determine how interactions run between different actors. Sometimes actors adapt these institutional frameworks to work together more effectively; this is also known as meta-governance (Sørensen & Torfing, 2009).

Conflict is almost inevitable when networks come together for divergent interests (Klijn & Kloppenjan, 2016). GNT therefore analyses how conflict is managed through negotiation and mediation to reach a workable agreement. Coming to an agreement is often difficult and happens step by step. Things must be repeated and adjusted. Keeping talking well and managing the process well is necessary to keep working together (Klijn & Kloppenjan, 2004).

2.4.3 Deepening through accountability patterns

Baalbergen et al. (2023) build upon the existing Governance Network Theory. Their research focuses on the housing of labour migrants, using the cases of Rotterdam and The Hague. The study explains how the institutional context and the strategic interests of actors together shape the policy processes.

According to Baalbergen et al. (2023), three forms of accountability fall under the institutional context. These are vertical accountability (hierarchical), horizontal accountability (between equal levels of government), and public-private accountability (between government and market actors).

1. Vertical accountability means that higher levels of government, such as provinces, are expected to supervise lower levels, such as municipalities. This often does not happen. As a result, municipalities are left to handle responsibilities on their own, without clear coordination. This can lead to

tension. For example, cities with many labour migrants may feel they carry an unfair burden compared to nearby municipalities that do not take similar responsibility.

2. Horizontal accountability refers to cooperation between actors at the same level of government, such as municipalities within a region. In practice, municipalities can have highly different policies and levels of commitment when it comes to housing labour migrants. Regional discussions often move slowly and result in only minimal agreements, which can negatively affect the position of the labour migrant.
3. Public-private accountability is about the cooperation between public bodies, such as municipalities, and private actors, such as employers. Employers and recruitment agencies usually focus on the labour migrant's work and pay less attention to where and how they are housed. This often results in a lack of responsibility on the part of employers. At the same time, municipalities usually do not have a clear picture of which employers are arranging housing, which makes it difficult to enforce rules or act.

The research indicates that municipalities and employers frequently transfer responsibility, which enables specific housing issues for labour migrants to persist (Baalbergen et al., 2023).

Furthermore, there are strategic interests that are present within the network. These include economic interests, which are a result of the demand in the labour market and the economic reliance on labour migrants. Additionally, there are social and political interests that are associated with public support, the "Not In My Backyard" principle, and the burden on local neighbourhoods. Lastly, the preservation of the status quo is identified as a strategic interest, with some actors opting to avoid acting or attempting to minimise the issue (Baalbergen et al., 2023).

2.4.4. Application in the context of this research

The Governance Network Theory (GNT) can be effectively applied to the housing issue for labour migrants in Apeldoorn. This research also involves a variety of actors operating at different levels of government. On the public side, this includes the municipality of Apeldoorn and the national government. On the private side, actors include employment agencies, employers, and property developers. Civil society is represented by interest groups advocating for labour migrants and information centres related to this topic.

Within this network, factors such as political decision-making, social support, economic interests, and institutional conditions all influence the effectiveness of specific housing solutions. Conflicts between, for example, residents or project developers and the municipality are managed through network processes. GNT helps to clarify these complex interactions and interdependencies and explains why certain policy solutions succeed while others do not. This aligns well with the central question of this research. It highlights that policymaking cannot be carried out by a single actor (such as the municipality of Apeldoorn) but is instead a dynamic interaction between all actors involved in this issue.

2.5 Operationalisation

The concept of “contextual factors” is drawn very broadly during this study. The main factors drawn from the literature and the Roemer Report (Aanjaagteam Bescherming Arbeidsmigranten, 2020) can be divided into social, economic, and political-institutional factors.

The effectiveness of housing solutions will be tested during data collection. In this, it follows from the Roemer report (Aanjaagteam Bescherming Arbeidsmigranten, 2020) that three things are particularly important.

1. Physical condition. Do the housing units meet the right quality standards?
2. Sustainability. Are the solutions temporary or structural?
3. Acceptance. Do the solutions lead to social acceptance and stability?

The governance network theory is tested for three main elements. First, the network structure. In this, the actors will be mapped out, and their interdependence with each other will be examined. Next, we will look at the accountability structures, with vertical, horizontal, and public-private accountability, and see how all responsibilities are divided. Finally, we will look at how to work together despite the perhaps different goals of each actor.

All the literature in this chapter creates the following conceptual model (Figure 3).

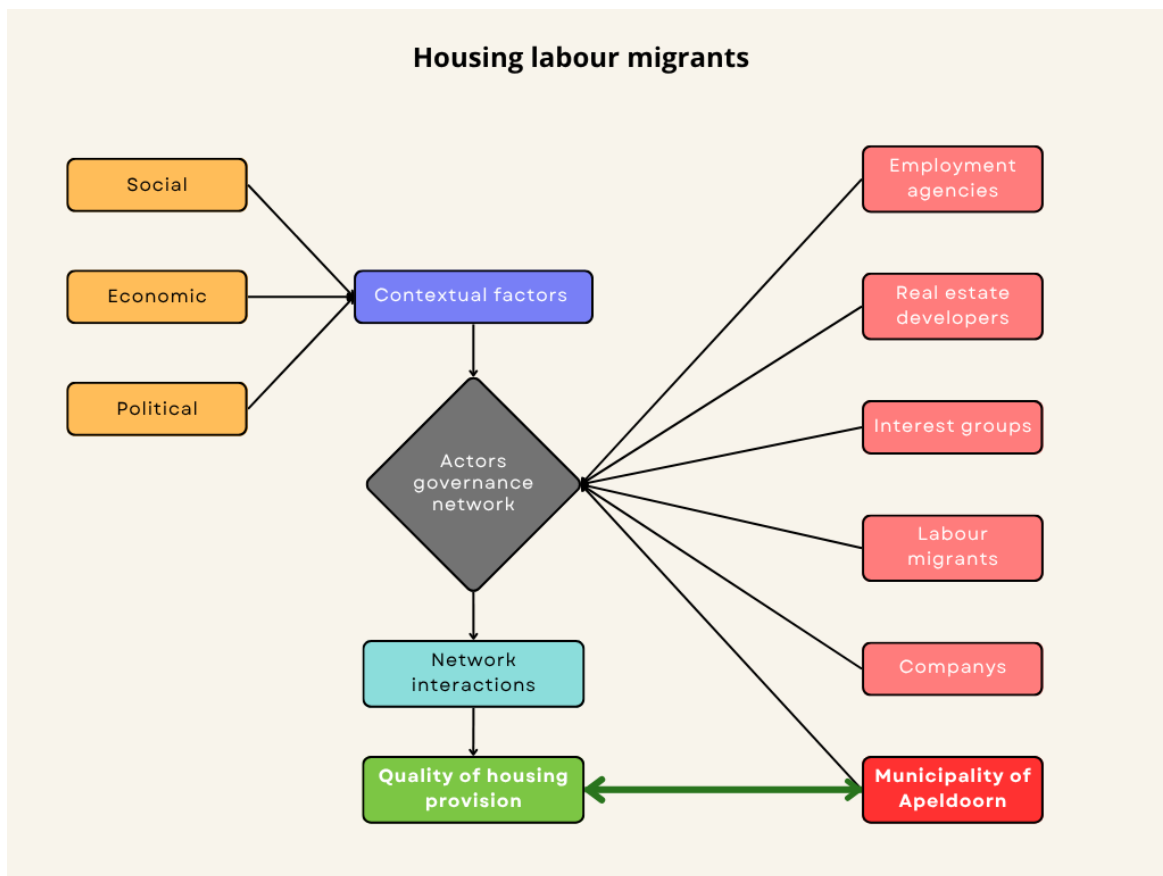


Figure 3: Conceptual Model (Own work, 2025).

3 Methodology

This chapter outlines the methodological framework of the study. It defines the research strategy, details the methods for data collection and analysis, and addresses the study's validity and reliability.

3.1 Research strategy

This research adopted a qualitative case study approach to examine how contextual factors influence the effectiveness of housing solutions for labour migrants in Apeldoorn. A qualitative design was appropriate because the study aimed to gain in-depth insight into governance structures, local dynamics, and the perceptions of stakeholders, rather than testing predefined variables through the statistical methods characteristic of quantitative analysis (Lakshman et al., 2000).

Qualitative research has several paradigms (Guba & Lincoln, 1994); the research was grounded in a constructivist epistemological paradigm. This perspective, which assumes that social reality is constructed through individual interaction, is particularly suitable for analysing the subjective interpretations of stakeholders such as municipal policymakers, employment agencies, and labour migrants. The aim was not to uncover a singular objective truth but to understand how different actors perceive and shape housing policies in practice.

The research combined primary fieldwork in the form of semi-structured interviews with secondary analysis (Jupp, 2006). This methodological triangulation allowed for a robust understanding of both the formal policy context and lived experiences. Secondary sources included municipal policy documents, national reports on labour migrants, and other data sources that complemented the empirical findings from the interview.

3.2 Case Study

This research employs a case study design. Jochems and Joosten (n.d.) define a case study as follows: “An intensive study of a phenomenon within its natural situation, such that intertwined relevant factors are preserved.” According to Zijlstra and Boumeester (2020), choosing a case study offers many advantages. This research will therefore take the form of a case study, focusing on the municipality of Apeldoorn to analyse the efficiency of its decision-making on the housing issue for labour migrants. Zijlstra and Boumeester (2020) emphasise that a case study offers an in-depth insight

into research because it is limited to the specific case. Within case studies, intensive data collections, including in-depth interviews and document analysis, are mostly used. This collects detailed data for understanding the right nuances within the research. This type of research makes it possible to make comparisons between housing solutions and examine the policies of the municipality of Apeldoorn. It was chosen for this research to take the entire municipality of Apeldoorn as a starting point, which also means that the surrounding villages fall under the name of the municipality of Apeldoorn (Figure 4). This choice was made deliberately because the research problem illustrated that many labour migrants currently live at holiday parks in surrounding villages, such as, for example, Beekbergen (part of the municipality of Apeldoorn) (Rutgers & Veeneman, 2024). Figure 4 illustrates the geographical scope of this single case study.

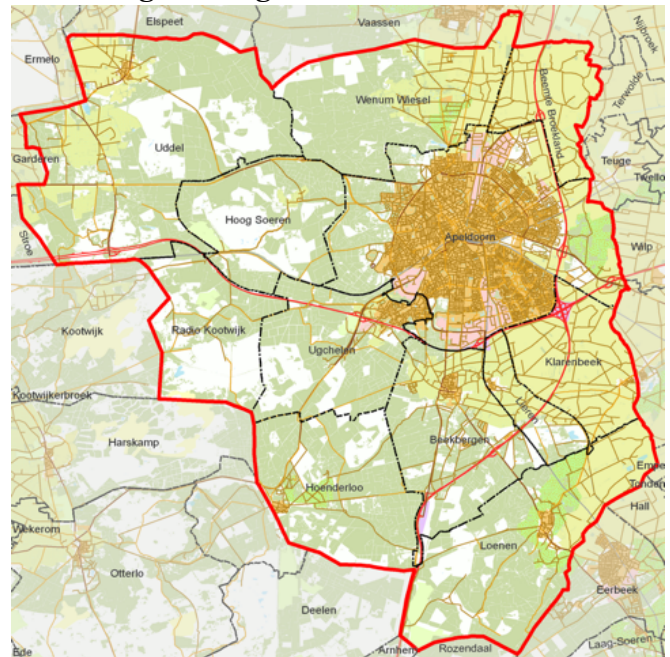


Figure 4: Municipality of Apeldoorn, the area of the case study (BAG-viewer, 2025).

Figure 4 illustrates the geographical scope of this single case study.

3.3 Data collection

Data were collected to answer the main research question through semi-structured interviews, document analysis, and secondary data.

3.3.1 Interviews

A suitable method to use for the research is ‘semi-structured interviews.’ According to Magaldi and Berler (2020), semi-structured interviews combine structured questions with open-ended questions. This allows room to address topics that arise spontaneously during an interview. The method establishes in advance a basis of questions the interviewer intends to ask, but there is room for flexibility. An interview guide is also developed to ensure the focus remains on core topics and the answers that will be useful to the interviewer during their research (Bryman, 2016). It also allows the researcher to collect a significant amount of data, as it touches on multiple topics. This research focuses on the housing problems of labour migrants. Semi-structured interviews in this way can help better understand the subjective experiences of labour migrants. It can also explore the views of policymakers and get a picture of how these

groups perceive current housing solutions and where there might be room for improvement.

To understand the issue from multiple perspectives, a diverse mix of stakeholders and experts from various fields was deliberately selected. Additionally, to strengthen the validity of certain findings, multiple individuals from the same role were interviewed, such as labour migrants, real estate developers, and representatives from the municipality of Apeldoorn. While conducting the interviews, the information saturations were considered in between. Thus, multiple actors from different perspectives were deliberately chosen to gather as much information as possible. After conducting twelve interviews, it was determined that theoretical saturation had been reached, as consistent themes emerged across the data, providing a sufficient basis for analysis. All interviewees are listed in Table 1.

Participant	Function
P1	Policy advisor housing labour migrant
P2	Labour Migrant
P3	Labour Migrant
P4	Alderman in the municipality of Apeldoorn
P5	CEO of housing facilitation between house owner and labour migrant
P6	Account holder housing province of Gelderland
P7	CEO of a real estate developer of labour migrant housing
P8	Policy advisor/spokesperson interested in labour migrants
P9	Council member in the municipality of Nijmegen
P10	Manager of employment agency
P11	CEO of a real estate developer of labour migrant housing
P12	Alderman in the municipality of Apeldoorn

Table 1: All participants during the research (Own work, 2025).

3.3.2 Document analysis

In addition to conducting interviews, secondary sources are also analysed. These sources make it possible to verify statements from respondents (Patton, 2015) and provide a better understanding of the formal and public debate surrounding the housing of labour migrants.

The most important document throughout this research is the Roemer report (Aanjaagteam Bescherming Arbeidsmigranten, 2020). This report contains

recommendations for national and local governments on how to combat malpractices, which ultimately need to be implemented by each municipality. Furthermore, reports from several government ministries (such as the Ministry of Social Affairs and Employment) were reviewed to anticipate what measures authorities are already working on and intend to implement on this subject. Provincial reports, for example, from Decisio (2022), were also consulted. These provided insight into the number of labour migrants and their distribution across the province.

Before this study, there was a conspicuous lack of municipal reports on the housing of labour migrants, particularly in Apeldoorn. This absence provided a key motivation for the research, especially since the Roemer report (Aanjaagteam Bescherming Arbeidsmigranten, 2020) explicitly states that action must be taken on this issue.

The consulted reports were used as input for the interview questions. Additionally, the documents were used to contextualise and support the respondents' statements in Chapter Four. They helped in distinguishing between municipal housing recommendations and practical realities, particularly in the five years following the publication of the Roemer report.

3.4 Data analysis

While conducting the interviews, the privacy of the respondent must always be considered. Thus, ethical considerations will be considered here. These considerations will be clarified in the next section. The interviews will primarily be conducted in person; however, if preferred by the respondent, an online format is also possible. With the respondent's consent, the interviews will be recorded and treated confidentially. An interview guide, including the key questions, will be provided to the respondent well in advance. The interviews are transcribed for subsequent analysis. The data are analysed in the program ATLAS.ti (ATLAS.ti Scientific Software Development GmbH, 2024). The extracted data are coded within the program of ATLAS.ti. According to Creswell and Poth (2017), there are several ways of coding where a combination of three codings may be relevant to the study.

- Open coding: this involves exploring and developing the mass of data into a broad set of codes. This helps in getting an overview of relevant variables and topics;

- Axial coding: after open coding, connections can be made. Because during this research, different factors are considered and tested against the policies of the Municipality of Apeldoorn, axial coding can be used to relate them to each other;
- Thematic coding: coding can be completed by grouping codes into different themes, such as housing accessibility and policy challenges within the municipality (Creswell and Poth, 2017).

The transcripts were open-coded, after which codes were grouped into themes (axial coding). These themes correspond to factors from theory and recur in multiple interviews, indicating saturation.

3.5 Validity and reliability of the research

Ensuring validity and reliability is essential to the scientific value of the study. Within this study, the strategies employed, and methodological considerations are discussed, and the reliability and validity of the study are explained.

3.5.1 Validity

Internal validity has to do with the credibility of the results within the study (Lincoln & Guba, 1982). Credibility can be enhanced with the triangulation of data sources (Van Thiel, 2014). Because many different groups of actors were interviewed, multiple perspectives on labour migrant housing were obtained. Finally, internal validity is also ensured through peer debriefing (Lincoln & Guba, 1982). The thesis supervisor is closely involved in the research and provides critical reflection on certain interpretations and conclusions.

External validity is characterised as the transferability of results from the research, which may also be relevant outside the specific research context (Lincoln & Guba, 1982). It allows readers to generalise relevance to other contexts. Yin (2013) describes analytic generalisation by linking empirical findings to existing theories. Thus, during this study, the interviews are also linked to existing governance network theory. Therefore, insights from the governance network in Apeldoorn can offer transferable lessons for other municipalities facing similar challenges in housing labour migrants. The topic presents a recognisable problem as more municipalities are struggling with this issue. This also supports the potential relevance to other municipalities and thus transferability, based on the findings in chapter four.

3.5.2 Reliability

Reliability, also often referred to as dependability, refers to the replicability and consistency of research (Van Thiel, 2014). This means that under similar circumstances and using the same data and methods, other researchers would arrive at similar results and conclusions (Van Thiel, 2014). Reliability has been ensured in several ways. First, the research is transparent. The research process is rendered transparent through a clear explanation of respondent selection and the data analysis procedure.

There is also consistency in data collection. The consistent use of a semi-structured interview guide ensured that a core set of themes was explored with all participants while allowing flexibility to tailor specific questions to the respondent's area of expertise. All transcribed interview data were systematically coded, demonstrating a structured approach that contributes to consistent interpretation. This also reduces the likelihood of arbitrary conclusions (Creswell and Poth, 2018).

Triangulation was also applied in this research. Triangulation refers to the use of multiple sources and methods to study a phenomenon (Van Thiel, 2014). This was achieved by interviewing a wide range of respondents. The public domain, the private sector, labour migrants themselves, and many representatives from civil society all contributed to this study. By considering all these respondents together, answers could be compared and cross-checked to ensure a balanced and well-rounded understanding.

4 ANALYSIS AND RESULTS

This chapter analyses the interviews and presents the results based on the data. Twelve interviews were conducted with various people and experts regarding the topic of housing for labour migrants. The results have been compared and thoroughly analysed through coding in ATLAS.TI. Due to anonymity, the names of respondents will not be mentioned but will be identified as 'R' followed by a number.

This research focuses on which contextual factors influence the policy of the municipality of Apeldoorn regarding the housing of labour migrants. First, the most important factors emerging from the interviews will be highlighted; then, these will be linked to the Governance Network Theory, and finally, the suitability of these solutions will be assessed based on the different factors.

4.1 Administrative vision and policy frameworks in Apeldoorn

Research within the municipality of Apeldoorn demonstrates that the municipality lacks a clear vision for housing labour migrants (Respondent 4, Alderman in Apeldoorn, 14.04.2025) (Respondent 12, Alderman in Apeldoorn, 23.05.2025). This is confirmed by recent news articles in which the municipality acknowledges wanting to gain 'more control' over housing and is exploring new solutions, which indicates a reactive rather than a proactive stance (Kuipers, 2024; Rutgers & Veeneman, 2024). This issue touches multiple policy portfolios, from housing construction to work & income and social care. An alderman within Apeldoorn acknowledges that this is just the beginning and that an initiative is underway that should encompass all aspects to improve this policy. The municipality of Apeldoorn is now taking internal steps, for example, by setting up a permit system specifically for labour migrants (Respondent 12, Alderman in Apeldoorn, 23.05.2025). The municipality underestimated the problem for too long and often let it go. Apeldoorn states that the municipality is only now making an effective analysis of the problem and trying to make a policy on it.

"We don't have one vision, and that's quite problematic." – (Respondent 4, Alderman in Apeldoorn, 14.04.2025)

The absence of a clear administrative direction has led to reactive and fragmented policy in recent years. Labour migrants were mainly accommodated ad hoc in existing options (holiday parks, private rentals) without a strategic plan. From a

governance network theory perspective, a shared vision is important to connect actors in the policy network. In Apeldoorn, such a unifying vision was missing, causing stakeholders, employment agencies, employers, and landlords, but also the municipality, to act from their own perspective. Almost all interviews indicate there is a problem concerning labour migrant housing and that real policy efforts are needed.

The lack of a clear vision within the municipality of Apeldoorn makes it harder to realise an effective approach because measures in one area (e.g., stricter enforcement of illegal housing) were not coordinated with actions in another (e.g., providing alternative housing supply). An expert notes that many municipalities make excuses because they cannot do something instead of actively searching for solutions (Respondent 5, CEO of housing facilitation, 16.04.2025). Such an attitude indicates a lack of administrative courage and vision. Respondent 11 (21.05.2025), a developer with experience collaborating with Apeldoorn's municipality, confirmed this missing courage.

*"Municipalities must reason the other way around and must indicate what they can do."
– (Respondent 5, CEO of housing facilitation, 16.04.2025)*

*"In Apeldoorn it is with the municipality; I think it's hopeless. Bad cooperation, being in each other's way, not thinking along. We offered all the options, or other options, but we all didn't want to know anything. They just wanted to have their own thing." –
(Respondent 11, CEO of Real Estate Developer, 21.05.2025)*

Administrative leadership and competence are crucial. It makes a difference whether an alderman is willing to face resistance and “engage in conversation with the environment and neighbourhood” or whether they prefer to “continue with as little hassle as possible” (Respondent 5, CEO of housing facilitation, 16.04.2025). Governance Network Theory emphasises that without clear central coordination by the lead partner (here, the municipality), a policy network remains fragmented. The interviews suggest that Apeldoorn is only now trying to take on that coordinating role by formulating an integral vision and involving all relevant actors. The municipality of Apeldoorn aims to work closely with employers and certified employment agencies and seeks to be at an early stage in a new plan concerning the housing of labour migrants (Respondent 12, Alderman in Apeldoorn, 23.05.2025). A key finding is the lack of cooperation between the municipality and the other actors, which, according to the Governance Network Theory, hinders joint problem-solving ability.

4.2 Institutional frameworks and regulations

National and local regulations strongly influence which housing solutions are possible. At the national level, recent steps have been taken toward stricter regulation, but implementation is slow. Interviews demonstrate that the first recommendations from the Aanjaagteam-Roemer (2020) have been translated into legislation, such as the new Good Landlord Act. However, there is still much to gain, such as plans to certify employment agencies (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). The municipality is heavily dependent on changes in national government plans.

“And I think that the national government is also far too lax in its operation. Of course, proposals have been made for years to, for example, certify the employment agencies and set much stricter requirements for them. Well, that bill has now been delayed again until early 2028, I believe” – (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025)

Municipalities still lack tools to tackle fraudulent employment agencies. Respondent 1 (Policy Advisor housing labour migrants, 31.03.2025) points out that this is a major obstacle in “this entire dossier,” since the companies that poorly house their employees often also provide poor working conditions. In other words, insufficient national rules and enforcement (e.g., against employment agencies) lead locally to worse housing conditions. Locally, many municipalities already have instruments, but their application falls short. For example, housing regulations exist that allow a maximum of four persons per dwelling. Municipalities can, of course, enforce rules against unlawful use, such as at campsites or holiday parks (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). Such rules apply in Apeldoorn too, but experts say that in practice, “we all know” policy is often not executed.

Enforcement is difficult due to limited capacity and priority. A provincial policy officer confirms that abuses (such as overcrowding at campsites or in homes) must

“We would like to act, but we don't have any power. So, then you must go to the municipality. Because yes, then I think, the mayor is authorised, and he can close a place where things are not going well.” – (Respondent 6, Province of Gelderland, 01.05.2025)

primarily be tackled by the municipality. Municipalities have the authority to act against this. Enforcement is important throughout the entire process to regulate abuses.

Still, the province sees municipalities hesitate to act. For example, on Veluwe holiday parks where labour migrants live permanently, there is tolerance or only incident-based enforcement when things go wrong (such as serious nuisance or violence). The municipality of Apeldoorn has acknowledged that enforcing residence on holiday parks is “very difficult,” partly because the legal status of short stay versus permanent residence is a grey area. A labour migrant describes how at the Beekbergen campsite (Apeldoorn municipality), where he initially lived, he had to move every three weeks to another chalet to bypass the maximum length of stay. The employment agency and campsite owner pretended they were tourists (Respondent 3, Labour Migrant, 01.04.2025).

“So, every three weeks we had to move. When we moved, I’m saying we lived in apartment five, and we had to move to apartment seven. So, they rented again to the other name. We go to the same camping, but we have to move all the time, every three weeks.” – (Respondent 3, Labour Migrant, 01.04.2025)

The example of this labour migrant confirms the abuses that are taking place within the municipality of Apeldoorn. The need to move to circumvent permanent residency rules is a painful confirmation of the reality of the situation. These are signs of a much broader problem. As previously confirmed by Van Der Krabben et al. (2014), enforcement of permanent residency in recreation parks is severely lacking. The fatal stabbing further underscored the urgent problem Apeldoorn is facing and fuelled the discussion about safety and liveability (Rutgers & Veeneman, 2024).

This construction circumvents regulations and illustrates that existing rules miss their purpose when creative evasion occurs. European regulations are sometimes

“I cannot recognize that the municipalities hide behind European regulations. I have actually come across it little, and I would not know of any European regulations that bother them about housing. Because housing is just a fairly nationally organised issue.” – (Respondent 5, CEO of housing facilitation, 16.04.2025)

cited by local actors as an obstacle, but opinions are divided. An alderman suggests that ‘European regulations’ allow much, for example, that employers may house labour migrants almost without limits under flexible conditions. Experts indicate that EU rules mainly concern free labour mobility and that housing is primarily a national responsibility.

Referring to Brussels can sometimes be too easy, according to experts. The real challenge lies more in national frameworks and their enforcement. At the same time, free movement within the EU has other effects; it gives municipalities no instruments to steer labour migration itself, and national legislation is partly framed by EU directives on the free movement of people. Respondent 4 (Alderman in Apeldoorn, 14.04.2025) from Apeldoorn's municipality says she would like to combat exploitation, but “you don't have a law behind you” because EU rules allow many labour arrangements.

"You also found that during the corona pandemic, we see that the labour migrants were really pushed into vans to work in the meat industry, for example, so from the subject of 'work and income,' we say, but then you run into European regulations again. That is that everything is allowed." – (Respondent 4, Alderman in Apeldoorn, 14.04.2025)

This creates an additional tension. Legally, municipalities can hardly exclude labour migrants (although they can impose extra requirements on employers, which will be addressed later), while they do have to solve the local negative side effects of abuses related to labour migrant housing.

Another institutional aspect is the role of housing corporations. Since a policy intervention by former Minister Blok, corporations are explicitly prohibited from providing short-term housing for labour migrants (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). This means a public housing provider is missing in the network, and the market is relied on. Corporations can help labour migrants only once they have the status of regular housing seekers, which is the case upon registration and long-term residence in the Netherlands. However, in practice, this often takes years due to long waiting lists.

This institutional framework means that flexible housing for labour migrants is a market-driven segment, with all the advantages and disadvantages that entail. Positively, new legislative proposals enforce minimum quality standards. For example,

"Now in the recently adopted act 'WTTA,' for example, it is also indicated that as an employment agency, you must be SNF certified, for example. We have been using the SNF certification for a very long time as a kind of ultimate bottom line." – (Respondent 7, CEO of Real Estate Developer, 28.04.2025)

the new “Admission to Availability of Labour” Act (WTTA) obliges employment agencies to be certified (Respondent 7, CEO of Real Estate Developer, 28.04.2025). The law has not yet come into effect, but was passed by the House of Representatives this April. The Senate still must approve it. It is expected that the law will take effect January 1, 2027, with the admission requirement starting January 1, 2028, making it forbidden to provide labour without admission.

SNF standards set basic requirements for housing, such as room size, number of persons per room, fire safety, hygiene, etc. A real estate developer interviewed has long applied these standards as a minimum (Respondent 7, CEO of Real Estate Developer, 28.04.2025). They advocate applying the Roemer standard, which requires better room occupancy than the SNF label describes.

"We have been using the Roemer standard for a very long time. It is a great wish of ours that the Roemer standard be translated into concrete laws and regulations so that municipalities can also enforce this and that they have an instrument. And the Roemer standard is, of course, very clear, and you can, of course, test whether it is met or not in the planning. So, our starting point is also that we feel that preferably you have two people maximum in one room." – (Respondent 7, CEO of Real Estate Developer, 28.04.2025)

However, there are some criticisms of the SNF label. Respondent 8 (Spokesperson of labour migrant housing, 07.05.2025), representing labour migrants' interests, points out that SNF allows two persons to sleep in a twelve-square-meter room. The Roemer standard would be a better measure of the surface area. Also, some SNF-certified buildings do not have permits to house labour migrants, and those buildings are full of camera surveillance, which is not allowed. Finally, municipalities want information from SNF about certain certifications and assessments of specific buildings in the municipality, but do not always receive responses.

"You have to imagine, so that is a quality mark that has not done it at all on a number of points; and if you as a municipality do want to arrange it properly, you will not get your information. Then it's just nothing. That is very harmful. That's really very harmful." – (Respondent 8, Spokesperson of labour migrant housing, 07.05.2025)

If the Roemer standard becomes national legislation, municipalities can test this when issuing permits, improving the suitability of new housing. Now, it still often happens that four people in one room are formally allowed if fire safety is not violated. Under such conditions, fraudulent landlords can save on space at the expense of residents. The interviewed Romanian labour migrant said that municipal inspectors visited and vaguely asked labour migrants some questions.

“But, yeah, the employment agency tells you, tell the people in your house, tomorrow someone will come to see how the house is; can you check this? Can you clean this? Or maybe they are leaving more people than they should, and they say, can you not be at home that day?” - (Respondent 2, labour migrant, 01.04.2025).

This illustrates that rules are only effective with unannounced inspections and actual enforcement. Her advice to the government was clear: “Check the paperwork better” (Respondent 2, labour migrant, 01.04.2025). Ensure that everyone is officially registered at the address and that rules are not circumvented. This is confirmed by the province of Gelderland, which says that the numbers do not match registrations at municipalities, and there is still a large grey area.

4.3 Economic interests and the role of market parties

The economic context relates to the economy of Apeldoorn and the interests of employers, employment agencies, and landlords. Economic interests strongly determine which housing solutions come about.

“First of all, I think because the free market is at the helm, money talks, so that's part one. So as soon as the hirers can continue to do what they are doing, it is actually mopping up with the taps open.” – (Respondent 8, Spokesperson of labour migrant housing, 07.05.2025)

Apeldoorn attracts labour migrants mainly in the meat processing industry. Apeldoorn has several slaughterhouses in designated industrial areas. Additionally, Apeldoorn borders the ‘Foodvalley’ and ‘Noord-Veluwe’ areas, where many other sectors are located (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). Think of agriculture or horticulture. Apeldoorn has one of the largest labour migrant work areas in Gelderland. Therefore, many labour migrants stay in the municipality.

The housing market pressure is high for labour migrants, partly due to the general housing shortage in the Netherlands (R1, 4, 5, 6, 7, 8, 9). All interviewees mention the scarcity of affordable housing as the basic problem. Labour migrants indirectly compete with other groups for available housing. Because their stay is often temporary or uncertain, they mostly come up short in the regular housing market. Employers and employment agencies play a key role. They are the initiators of labour migration, as they bring people in. Employers have an economic interest in employing and housing labour migrants.

"That is now sometimes interpreted a bit as saying that an employer is not allowed to be a housing provider, and that is nonsense. To be honest, I don't want to think about that becoming policy, because then the turnips would be completely cooked, because fortunately there are still a lot of employers who provide decent housing. If they were no longer allowed to do that, then labour migrants would be completely at the mercy of the slumlord, so that is a disastrous idea." - (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025).

Good employers or agencies take responsibility and often invest in good housing through third parties. Fraudulent parties often push these costs aside, resulting in overcrowded rooms or campsites (Respondent 7, CEO of Real Estate Developer, 28.04.2025). The municipality of Apeldoorn indicated that entrepreneurs prefer labour migrants over local workers because labour migrants are subject to 'fewer conditions' (Respondent 4, Alderman in Apeldoorn, 14.04.2025).

"If you work, you also have to be paid, and we have even laid down through collective labour agreements how much exactly, what your rights are, you name it, that this is free movement within Europe of people; you see that there is room there because people (labour migrants) don't dare to say it, so they still work those (overtime) hours. You also saw what I just told you about Corona, the time when they were crammed into vans together. Yes, that goes beyond all limits of human rights that we have agreed upon here in the Netherlands, so then I call it exploitation of people." - (Respondent 4, Alderman in Apeldoorn, 14.04.2025)

Respondent 10 (16.05.2025), representing an employment agency, provides a good example of best practices. His organisation takes an integrated approach to support labour migrants, ensuring proper housing, transportation, and municipal registration. Each property has a dedicated housing manager, and the company offers language lessons (Respondent 10, Manager of an Employment Agency, 16.05.2025).

Wage costs and flexibility are economic motives for companies to hire labour migrants. Often these are jobs at the lower end of the labour market, so earnings are generally low (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). With flexible contracts, disposable income is often low, limiting housing options. Short-stay migrants have a harder time than long-stay migrants, according to Respondent 1 (Policy Advisor housing labour migrants, 31.03.2025), because long-stay migrants can eventually register with housing corporations, which is difficult for short-stayers.

“Where the problem really is that short-stay housing, we need a lot of that, and we have way too little of that, and that leads to piling up in places where it’s not desirable, and that leads to a lot of resistance.” – (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025)

For short-stayers, the financial position of the migrant is a factor in the (un)suitability of solutions. Low wages make them dependent on cheap employer-arranged housing, which is often of lower quality. At the same time, some market parties see a profit model in better housing for labour migrants. Some Dutch real estate developers fully focus on labour migrants as their target group. They build entire residential campuses if they have enough certainty. The CEO of a real estate developer emphasises that municipalities must grant longer permits to make investments profitable (Respondent 7, 28.04.2025).

“But we also often notice that there is a discrepancy between the local regulations of municipalities and the overarching regulations of, for example, the province or the national government. That doesn't help, shall I say. And we also notice that there is often still a lot of reluctance among municipalities to issue permits with a longer term. Municipalities are, of course, very used to a standard 10 plus 5 scheme under the zoning plan regime. And under the Environment and Planning Act, this is in principle no longer the standard. You can also just issue permits for 25 years. There are several municipalities that are now doing this. That helps us enormously, and of course it also helps the environment and the residents to create stability and structures.” – (Respondent 7, CEO of Real Estate Developer, 28.04.2025)

A longer exploitation period makes higher-quality and thus more expensive construction concepts financially feasible. However, if municipalities stick to short-term permits and mainly rely on ‘flexible housing,’ investors often choose cheaper movable units or drop out, resulting in labour migrants being assigned to poorer locations such as caravans or campsites.

“So, they all have a place somewhere, but for the most part, these are not places you would want, nor do they meet the regulations. So, solutions are being sought regardless; employers desperately need these people and will look for solutions one way or another. And because there is simply too little regular housing available, they often resort to using holiday parks.” - (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025)

“Yes, well, those campsites are also terrible. Moreover, the people are out of sight. There you are also at the mercy of gods if you end up there.” – (Respondent 8, Spokesperson of labour migrant housing, 07.05.2025)

Here we see how economic incentives and institutional frameworks come together. The interviews show a clear divide between good and fraudulent market parties. Good landlords cooperate with certified employment agencies that are members of ABU/NBBU. Good landlords often implement house rules and onsite management. Respondent 7 (CEO of Real Estate Developer, 28.04.2025) states that welfare officers are present 24/7 at all their locations, monitoring rules and being available as needed.

“And that also means working with decent employment agencies. So ABU or NBBU certified agencies that make clear agreements. For example, if someone loses their job, they are allowed to stay for another four weeks. They still have to pay rent, of course, but they are allowed to stay for four more weeks.” – Respondent 7 (CEO of Real Estate Developer, 28.04.2025)

This prevents people from suddenly being left homeless. This shows that companies with long-term interests are involved. They want workers to be stably housed so they are more productive at work. On the other hand, there are parties primarily driven by cost minimisation. For example, in the meat industry, incidents have occurred that have negatively influenced the image of labour migration (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). This expert explains that opponents of housing grab every argument. They speak of nuisance and

say, “They don’t belong here,” or “It’s disgraceful that these people are here and exploited.”

The negative feelings, partly due to the meat industry (Respondent 7, CEO of Real Estate Developer, 28.04.2025), lead on the one hand to calls for protecting labour migrants, but on the other hand, cause resistance to their presence, and people do not want them to live nearby.

“The companies that do not house their people well are also often the companies that have poor working conditions. So that has a lot to do with each other. Well, that, I think, is an economic factor that is enormous significance to the whole file.” - (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025)

That these problems persist is also confirmed by research that showed that labour migrants also view their housing situation as the most negative aspect of their entire stay in the Netherlands (Sobczyk-Turek et al., 2023). Labour migrants themselves also have economic interests and strategies. Many save money to build something at home, which means they tend to accept simple living conditions temporarily if their income is good. Respondent 4 (Alderman in Apeldoorn, 14.04.2025) noted that almost all labour migrants initially think “they will earn a lot of money here” to send to their family, but the reality (high costs, minimum wage) turns out differently.

Economic information is often lacking, so expectations do not match the housing situation they can afford. Economic factors work both ways. First, they create the need for housing solutions (demand for labour -> demand for housing), but they also form obstacles to suitable solutions (lower end of labour market -> limit housing quality).

“No, because the stories that are presented are not entirely honest. If you ask them, what have you been told? What did you think you got here? Then it’s a very different picture of what was portrayed for what it actually is.” – (Respondent 4, Alderman in Apeldoorn, 14.04.2025).

The effectiveness of policy interventions partly depends on aligning economic incentives with social goals. Integrating housing requirements when establishing new companies could be a step. A provincial official suggests that municipalities should

immediately involve employers when selling land for a new distribution centre (Respondent 6, Province of Gelderland, 01.05.2025).

"But then I think, yes, take that responsibility, municipality. You also facilitate this by, yes, knowing what kind of company will be there; also, make sure you arrange the housing. And then I look at the municipality, but that municipality should put that responsibility back on the employers. Because they buy a piece of land from the municipality. They know that there will be a distribution on it. How many employees will you have in the future? Make sure that if they are labour migrants, they also have the housing for each other." – (Respondent 6, Province of Gelderland, 01.05.2025)

In the policy network of labour migrant housing, it is about finding a new balance where market parties are not only the cause of the problem but also carriers of the solution.

4.4 Social perceptions, support, and integration

Social factors such as neighbours' attitudes, perceptions of labour migrants, and the degree of local acceptance are a common thread in all interviews. Almost every interviewee mentions resistance from society as a major influence on the effectiveness of housing policy.

"Well, that NIMBY effect is, of course, very big. That is very important. That's what you run into the most. The resistance there is to having that kind of housing happen is very strong, and that hinders good solutions." – (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025)

Neighbours fear nuisance and deterioration of their living environment. An expert shares opinions based on the real experiences of neighbours who worry. The expert describes understandable irritations: houses "packed full" with labour migrants, parking pressure from multiple vans, unfamiliar languages on the street, and groups of men drinking outside (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). Such situations have occurred and damaged trust. Driving away labour migrants does not always seem effective.

"But no one notices that the housing complex has a completely different owner than those private homes. And so, if that housing complex is full, that private homeowner will just let another bus with labour migrants come. So, you only have more. You can't move that at all. And that is very much burying your head in the sand, just looking the other way." – (Respondent 8, Spokesperson of labour migrant housing, 07.05.2025)

The key question is, where can labour migrants live without resistance? Practice shows two main options. Option one is spreading and mixing housing labour migrants on a small scale within neighbourhoods so they do not cause a concentrated nuisance and can integrate. Option two is clustering: housing them separately, so neighbourhoods are relieved. Both approaches face perception problems. With spreading, NIMBY emerges directly at the neighbourhood level. Neighbours oppose room rental houses, or 'Polish houses,' in their street. With clustering, macro-NIMBY arises when residents of the village or region fear an 'enclave' with all associated problems in one place. A journalistic example mentioned in two interviews was the stabbing incident at a holiday park in Beekbergen at the end of 2024.

"This time, two people died from here, the Romanians. They fight in a camping. One he fights in the centre, then he goes back to camping. And they found him, and they stopped him. And the other one, only in the camping." – (Respondent 3, Labour Migrant, 01-04-2025)

The labour migrant blames the circumstances. Continuously putting new people from different countries "together in a small space with four or six men, yes, that's where the problem starts, I think" (Respondent 3, Labour Migrant, 01.04.2025). His observation underlines that overcrowding and lack of privacy cause tensions that can escalate. This provides an important insight. The social nuisance neighbours fear partly results from unsuitable housing or a lack of control. Poor living conditions can cause friction among migrants, which in turn affects the surroundings. Good housing is thus not only in the interest of the labour migrant but also a means to prevent nuisance. During the interviews, positive proposals and ideas came up to address this. First, open communication and community dialogue in new projects. Respondent 5 (CEO of housing facilitation, 16.04.2025) emphasises that the municipality must proactively designate locations and engage in conversations with the community despite potential resistance.

"I'm going to do it means that we have designated five places where we will organise potential housing for labour migrants or target groups. Okay, then I'm going to start my environmental dialogue for those five locations with the five of you. And then I'm curious to hear arguments that make me do it differently so that I can come to a choice." – (Respondent 5, CEO of housing facilitation, 16.04.2025).

By identifying concerns early, plans can be adjusted where necessary, and some degree of joint formation can emerge. It is also important to actively counter stereotypes. A respondent from a real estate developer illustrates this with an example. At information evenings, they regularly hear, "Poles drive fast and drink a lot." Their response is joking: "If you now still mention stealing and raping, the bingo card is full" (Respondent 7, CEO of Real Estate Developer, 28.04.2025). With this, they make residents aware of the stigma they repeat. Incidentally, incidents involving alcohol/drugs do happen; they do not deny that. But good parties also indicate that good housing organisations strongly reduce this. Also, incidents happen in a 'Dutch neighbourhood,' but the focus is not so much there (Respondent 11, CEO of Real Estate Developer, 21.05.2025).

"Yes, there are sometimes quarrels. But I think if you have a hotel with forty Dutch people in another country, there will also be quarrels sometimes." – (Respondent 10, Manager of an Employment Agency, 16.05.2025)

During the interviews, measures were mentioned to monitor residence locations through supervisors or housing officers. They act as contact persons for questions and check for problems. Such measures take away important concerns from neighbours because they make the situation more manageable.

Nevertheless, gaining support remains a difficult process. Even when rational objections are removed, emotion and principled resistance play a role. This aligns with the idea that social inclusion is key to mutual understanding. In Apeldoorn, initiatives already exist to create contacts between labour migrants and neighbours, for example, via sports or neighbourhood meetings (Respondent 4, Alderman in Apeldoorn, 14.04.2025). However, practice is difficult; language barriers and mutual distrust limit success. Residents sometimes feel unsafe in public spaces because of groups of labour migrants, although this is not only about labour migrants. Conversely, labour migrants

can feel watched or discriminated against (Respondent 4, Alderman in Apeldoorn, 14.04.2025).

“But you also hear, for example, young girls becoming afraid to walk across the Marktplein anymore.” - (Respondent 4, Alderman in Apeldoorn, 14.04.2025)

These mutual social clashes lead to negative experiences on both sides. What influence do these social factors have on the effectiveness and suitability of housing solutions? First, they affect feasibility. If a plan faces fierce local opposition, it can be delayed for years or completely cancelled, no matter how necessary it is.

Second, the social environment influences how suitable the housing solution is for labour migrants themselves. Housing accepted by society is usually of better quality because there is more support and supervision. Completely isolating labour migrants is not a desired solution either. They will integrate less, which can lead to boredom or abuse.

“If you look at welfare, then it is not good for the well-being of the labour migrant, as is the environment. What you also often see is they don't all come here addicted at all, do they, just to be clear? Some people think, that's it now; But because of the circumstances here, they start drinking at some point. People seek each other out because they speak each other's language.” – (Respondent 4, Alderman in Apeldoorn, 14.04.2025)

Overcrowded, isolated living environments contribute to this. In short, social context is not a minor issue but a factor that directly contributes to the sustainability of housing solutions. In governance terms, it boils down to managing relationships and perceptions in the network. The municipality must position itself as a mediator between the community and market parties, building trust through transparency and guarantees of good guidance. Market parties must show they act responsibly and do not cause a nuisance. Labour migrants themselves should, where possible, be given a face. Successes of integration or good experiences could be communicated more to nuance the one-sided negative image.

The interviews also reveal contradictions that need to be discussed. Some residents say, “These people don't belong here; they are exploited,” while at the same time opposing every new shelter location (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025). This contradictory stance can be confronted in a dialogue. According to Governance Network Theory, it is important to bring all involved parties

together. They can then discuss their mutual dependencies and jointly find solutions. Only in this way can social factors that currently form an obstacle help advance the housing issue.

4.5 Interaction between government, market, and other actors (GNW-Theory)

The Apeldoorn case clearly shows that housing for labour migrants is a governance network problem. No single actor can solve it alone; they are interdependent. The municipality is formally responsible for spatial planning and liveability, but depends on employers and private investors to realise actual housing. The municipality does not bring labour migrants from abroad; employers and employment agencies do that (Respondent 4, Alderman in Apeldoorn, 14.04.2025).

At the same time, the municipality cannot simply point to entrepreneurs without taking control of itself. The interviews reveal much mutual blaming. The municipality of Apeldoorn thinks the national government or EU should come up with stricter policies (Respondent 4, Alderman in Apeldoorn, 14.04.2025); the province thinks municipalities should use their instruments better (Respondent 7, CEO of Real Estate Developer, 28.04.2025); municipalities put pressure on employers, expecting them to take first responsibility (Respondent 4, Alderman in Apeldoorn, 14.04.2025). Employers complain that municipalities do not want to facilitate locations (R6, 11). This division is typical for a policy network where governance is not yet optimal. These signs of mutual shifting of responsibilities align well with the public-private accountability concept by Baalbergen et al. (2023). The municipality wants to place the responsibility on the employers (Respondent 4, Alderman in Apeldoorn, 14.04.2025), as is also described in the literature review of the Roemer report (Aanjaagteam Bescherming Arbeidsmigranten, 2020). Nevertheless, project developers complain that municipalities provide insufficient facilitation and are unwilling to think along (Respondent 11, CEO of Real Estate Developer, 21.05.2025). This 'government network,' in which no single actor takes full lead, hinders the joint problem-solving capacity according to Governance Network Theory and explains why effective solutions are not forthcoming.

However, there are also examples of good cooperation. In Gelderland, the province has appointed a process manager for housing who supports municipalities and shares knowledge (Respondent 7, CEO of Real Estate Developer, 28.04.2025).

Such networks can ensure agreement on approaches, for example, that neighbouring municipalities jointly search for locations instead of passing problems around. The provincial official says people should not want labour migrants to live in East Netherlands while working in Rotterdam or even live across the border in Germany due to local housing shortages (Respondent 7, CEO of Real Estate Developer, 28.04.2025). A regional vision can prevent this. Within Apeldoorn, an interplay is seen between two respondents from the municipality. Their interviews show different perspectives: one looks through a planning lens at location issues and permits, while the other mainly focuses on social aspects such as exploitation and homelessness. Governance Network Theory stresses that such coordination within the municipality is crucial. Only by combining their insights with spatial supply and social preconditions can municipal policy be effective. This awareness is also heard in the interviews. Respondent 4 (Alderman in Apeldoorn, 14.04.2025) says the municipality now finally wants to come up with “a general vision that really touches all aspects.” It is also acknowledged that the municipality must take a coordinating role, not by building homes itself but by bringing parties together and facilitating (Respondent 1, Policy Advisor housing labour migrants, 31.03.2025).

The public-private interplay clearly emerges in developing new housing. Market parties indicate a willingness to invest if the government meets them with realistic conditions such as fast procedures, longer exploitation periods, and unambiguous rules (Respondent 7, CEO of Real Estate Developer, 28.04.2025). If cooperation succeeds, a win-win situation arises. The entrepreneur can generate returns, and the government obtains quality housing for the target group. A success factor is mutual trust. Currently, there is still much distrust. Municipalities fear private operators will ‘mess things up’ or leave after ten years with profits, leaving the community with a neglected property. Conversely, developers complain that municipalities are unnecessarily suspicious and “hesitant to grant longer permits” (Respondent 7, CEO of Real Estate Developer, 28.04.2025).

An obstacle to the realisation of good housing for labour migrants is the reluctance of municipalities to provide project developers with long-term permits. For example, the guidance by Kurvers et al. (2024), ‘Impact Assessment for New Business Activity,’ advises municipalities to make housing agreements as early as the establishment of new companies. Offering a long-term perspective to developers would

be a logical implementation of this advice to break the vicious circle of temporary and poor-quality housing.

Governance Network Theory finds it important that process agreements are safeguarded. The earlier argument for a clause that the landlord remains responsible for management for 25 years, so the municipality has certainty that no quick-profit takers enter, applies here. Some municipalities already do this, building trust, while others stick to short-term solutions out of fear.

Another aspect of public-private cooperation involves employers in housing. Here lie untapped opportunities. The provincial official notes that municipalities can make firm agreements about housing when new companies are established (Respondent 6, Province of Gelderland, 01.05.2025). This directly results from pressure from companies that want their staff housed nearby, but it requires adjusting zoning plans. If the municipality agrees, it shows they take employers' needs seriously. This can, in turn, stimulate employers to co-invest in decent housing in those locations.

A correct application of Governance Network Theory would be that the municipality facilitates locations and permits more easily, employers/agencies contribute financially to exploitation, a professional landlord manages the project, and neighbours are involved through information meetings.

The interviews also reveal tensions in the network. A clear contradiction exists between the municipal desire to lead versus the normative position that housing is primarily the employers' responsibility. Apeldoorn's municipality wants to put responsibility on employers. This aligns with the Roemer report's call to separate contracts and offer more independence to workers (Respondent 4, Alderman in Apeldoorn, 14.04.2025).

So far, pushing responsibility toward the market has not been highly successful: many employers point to the government for zoning plans and enforcement and remain in the background themselves. Governance clashes here; who owns the problem? In theory, everyone should do their part; in practice, they try to shift costs and effort to others. This explains why solutions so far are not optimal; there is no shared sense of ownership yet. Finally, it should be noted that labour migrants themselves hardly have a direct voice in the network but influence it through their behaviour and choices. If Apeldoorn improves its image and facilities for labour migrants, that can also yield economic benefits as migrants continue working in the region. This shows that the 'target group' is also an actor to consider. According to the Governance Network Theory, the municipality could better use feedback from labour

migrants in shaping policy. Interviews with labour migrants produced clear suggestions, such as more information upon arrival and more frequent inspections of landlords (Respondents 2&3, Labour Migrants, 01.04.2025). This input is valuable to improve the network because it provides insight into where policy aligns with reality.

5 Discussion and recommendations

This chapter discusses the research findings, interpreting them in relation to the sub-questions and the theoretical framework. Subsequently, it offers a reflection on this framework, presents practical recommendations for key stakeholders, and outlines suggestions for further research.

5.1 Discussion

5.1.1 Contextual Factors

The first sub-question was, “What are the main contextual factors shaping housing conditions for labour migrants in the municipality of Apeldoorn?”

The research revealed three primary categories of contextual factors that shape municipal decision-making regarding labour migrant housing: social, economic, and political-institutional.

Starting with the social factors, the NIMBY effect (Driscoll, 2013) does play a role in various municipalities, particularly when it comes to opening new housing locations. However, Apeldoorn has had existing housing locations for labour migrants for quite some time and does not experience significant resistance from residents. The main issue concerns addressing existing problems and improving enforcement.

That said, a stabbing incident at a holiday park last year has negatively affected public perception of new plans, although many respondents indicated that such incidents can happen anywhere and are not necessarily tied to labour migrants specifically. Residents do value social cohesion (Sampson et al., 2010), which makes it the responsibility of the municipality of Apeldoorn to carefully determine where labour migrants should be housed in the future.

Regarding economic factors, the research highlights that labour migrants are being exploited (Aanjaagteam Bescherming Arbeidsmigranten, 2020). Due to low wages and their dependence on employers or employment agencies for housing, labour migrants in Apeldoorn have very few options. Many companies focus on cost minimisation, which often results in minimal attention to the housing conditions of labour migrants.

On the political and institutional level, many issues remain. Apeldoorn lacks a clear vision regarding the housing of labour migrants. On the positive side, the municipality is now working on a regional plan and recently conducted a study on the issue. The municipality admits that it responded too late and now recognises the severity of the problem. Because of the absence of a clear vision, there is also a lack of proper

enforcement and resources to implement effective policies. For now, the municipality is awaiting the WTTA legislation, but Apeldoorn is already actively working on developing a local permit system specifically aimed at regulating housing for labour migrants.

Reflecting on the literature, these findings confirm theoretical concepts from chapter two. The NIMBY effect, according to Driscoll (2013), certainly plays a role in municipalities in the Netherlands where hardly any labour migrants reside. In Apeldoorn, however, this effect is more nuanced, arguably because residents have become accustomed to the long-standing presence of labour migrants. According to municipal representatives, there is only minimal resistance to new initiatives. The resistance that does exist is minor, and therefore the NIMBY principle is more nuanced when looking at the municipality of Apeldoorn. However, economic exploitation and poor housing quality do play a major role within the municipality. This is part of the national problem as described in the Roemer report (Aanjaagteam Bescherming Arbeidsmigranten, 2020). This research also confirms that this problem occurs within the municipality of Apeldoorn, evidenced by the abuses at, for example, the massive 'Pole parks.' Labour migrants themselves also indicated that there were occasional instances of overcrowding and the practice of being shuffled to other living spaces to evade permanent residency rules. Together, these factors create a complex network within which, as GNT posits, no single actor can solve the problem alone. The observed absence of a common vision therefore also reinforces the accountability patterns described by Baalbergen et al. (2023), in which responsibilities are shifted, and the negative effects of the contextual factors persist.

5.1.2 Policy frameworks and governance structures

The second sub-question was, “How do policy frameworks and governance structures in Apeldoorn influence the provision and management of housing for labour migrants?”

Because there are no clear agreements within the municipality or between the other parties in the governance network, each actor tends to follow its own course. The current policy frameworks in Apeldoorn seem to hinder rather than support an effective approach, largely due to the overarching core issue: the absence of a clear vision. Governance Network Theory (Klijn & Kloppenjan, 2012) states that effective policy depends on cooperation.

Municipal policies are often perceived as inadequate. Project developers, for example, expressed frustration with what they perceive as a lack of proactive engagement and strategic foresight from the municipality. Several domains within the Municipality of Apeldoorn relate to this study. In addition to the spatial planning domain, this issue also intersects with the policy domains of enforcement and ‘work and income.’ This requires tight collaborations within the various domains of a municipality.

Considering the accountability patterns of Baalbergen et al. (2023), several bottlenecks can be listed.

- Vertical accountability: there is a lack of guidance from higher authorities such as the state. Municipalities experience insufficient support to be able to enforce. Respondent 1 (Policy Advisor housing labour migrants, 31.03.2025) also stated that the state is much too late in acting against rogue employment agencies. In addition, the province, as a higher body, offers only a ‘facilitating role’ and is not a supervisor.
- Horizontal accountability: in terms of cooperation between other municipalities in the same region, it is currently highly limited. Divisions regarding the housing of Ukrainians, for example, are going very well, but smaller municipalities do not want to host labour migrants because they do not have employment opportunities for labour migrants and therefore do not see the need for housing. This means placing the primary burden on larger municipalities like Apeldoorn and Deventer. However, quite recently, a new initiative has been shown through a regional study to see if this cooperation can be renewed.
- Public-private accountability: the division of responsibilities between the municipality and employment agencies is still highly unclear. Both parties recognise what is happening, but too much is still being passed on to each other. While exploitative employers and agencies focus on minimising housing costs, the municipality struggles to hold them accountable. The lack of proper licensing systems exacerbates this problem.

Appendix 8.2 presents a table listing all relevant actors, detailing their primary interests, main resources, mutual dependencies, and the key challenges they face in operating within this problem context.

Looking back at the literature review, these findings on fragmented governance and the lack of enforcement illustrate the gap between policy intention and practice. A strong 'public-private accountability' issue (Baalbergen et al., 2023) is present, which is detrimental to the housing of labour migrants. Steps have been taken at the national level. As mentioned in the literature, the first changes are visible due to the Good Landlordship Act (Wet goed verhuurderschap) and the 'WTTA.' However, this case study shows that there is slow implementation and a lack of adequate enforcement capacity. The Governance Network Theory predicts that without effective coordination and collaborative policy between actors within the governance network, insufficient progress can be made on housing policy for labour migrants.

5.1.3 The reality for labour migrants

The third sub-question was, “What are the experiences and perceptions of labour migrants regarding their housing situation in Apeldoorn?”

The quality of housing for labour migrants is often still below standard. Labour migrants report issues such as overcrowding, lack of privacy, and uncertainty about the duration of their stay, something the Aanjaagteam Bescherming Arbeidsmigranten (2020) also described. While the broader national housing shortage in the Netherlands undoubtedly exacerbates this problem, labour migrants face a unique set of challenges.

The pressure from some employment agencies to cover up certain issues highlights the way some housing providers handle these structural problems. For example, instructing labour migrants to tidy up or be absent during inspections points to clear misconduct by certain companies in this largely unregulated market. The cost of housing is often high compared to the quality provided. In some cases, housing is still tied to the employment contract, which only increases the migrant's dependency and vulnerability.

Several interview respondents indicated that they hear many stories about dissatisfaction among labour migrants, particularly concerning safety (for example, the stabbing incident) (Veeneman & Rutgers, 2024), housing security, and hygiene in the accommodations. In Apeldoorn specifically, this was not directly raised in the interviews, but it was mentioned that there is a significant amount of movement between locations such as campsites, as labour migrants are not allowed to live there permanently. This leads to an unstable home base and a lack of peace and continuity.

It also became clear that labour migrants are poorly informed about their rights and obligations in the Netherlands. In addition to being exploited or underpaid for overtime, municipalities and employment agencies sometimes fail to properly inform them about matters such as insurance, healthcare, or income.

Poor housing conditions often have a negative impact on the well-being and health of labour migrants. Stress, insecurity, or sleep deprivation can result from these abuses. This can result in decreased work performance and a reduced capacity or desire for social integration.

All of these points to shortcomings in governance structures. When oversight bodies fail, it creates space for rogue actors to take advantage. Labour migrants are then exploited and lack the influence within the governance network to change their situation. Without an effective platform to voice their concerns, their needs remain overlooked, which weakens the impact of policy interventions.

The experienced reality of the labour migrants in this study confirms the bleak policy that emerged from the literature. Loomans (2023) indicated that it is common for labour migrants to end up living on campsites. This is also the reality in the municipality of Apeldoorn. Manting et al. (2022) pointed to the temporary nature of the housing that labour migrants want and seek in Apeldoorn. The fact that an interview revealed they sometimes must involuntarily move from chalet to chalet just to maintain their 'temporary status' is shocking. In this way, labour migrants can never live comfortably or try to build a life for themselves. From the perspective of governance network theory, the labour migrants are the actors with the least amount of power within the governance network. They do not know their rights and obligations, a fact also shown by the results, which more often leads to exploitation. Their negative experiences are therefore a symptom of a failing network, in which their interests are subordinated to the predominantly economic interests of the more powerful actors.

5.1.4 Policy adjustments for more effective housing solutions

The fourth sub-question was, “What possible policy adjustments and improvements could contribute to more sustainable and effective housing solutions for labour migrants in Apeldoorn?”

The need to develop a clear vision has been mentioned repeatedly and seems widely acknowledged. The municipality of Apeldoorn also recognises this and sees it as the starting point for moving in the right direction. Various policy areas must

coordinate broader policy frameworks, and agreements will also need to be made at the regional level.

Second, the governance network must be improved by facilitating better cooperation between the municipality and all market actors. Efforts should be made to improve housing quality and increase the overall supply of housing for labour migrants. Closer attention is needed to the situations at holiday parks, and new initiatives should be explored, such as engaging with companies to develop housing on industrial estates or converting old buildings. Granting long-term permits by the municipality could help support developers in these efforts.

Enforcement also needs to be strengthened. In addition to monitoring the housing conditions for labour migrants, dishonest employment agencies or employers should be inspected based on their certifications and permits. Proper registration with the municipality should be made a requirement.

The policy adjustments that stem from this research are largely a local confirmation of the solutions already proposed in literature and policy documents, mentioned in section two. The findings indicate that Apeldoorn is significantly behind in developing a coherent vision, a foundational step required to make meaningful progress. The municipality itself also indicated that this problem was acknowledged far too late. The solutions from the Roemer report (Aanjaagteam Bescherming Arbeidsmigranten, 2020) are clear, and Apeldoorn has taken the first steps based on the report by starting to require landlords to have permits for the proper rental of their properties. The need for better collaboration, as evidenced by Governance Network Theory, is clear to the municipality of Apeldoorn. The municipality is already trying to make plans for this itself. The research validates that the challenge no longer lies in the knowledge of the problem but in the power of implementation and coordination, a point from the analysis of accountability patterns according to Baalbergen et al. (2023).

5.2 Recommendations

5.2.1 Recommendations for Further Research

A similar study could be conducted in the future, focusing on the new implementations from the Roemer Report, which by then will likely have been put into practice. As in many other municipalities, the municipality of Apeldoorn only realised relatively late that the issue of labour migrants was more significant than initially anticipated. A follow-up study in three to five years could offer a more realistic

perspective, once Apeldoorn has developed its own vision on the matter and, for example, laws like the WTTA are fully enforced.

Practice has shown that the NIMBY effect in the municipality of Apeldoorn is more nuanced. It appears to be more about isolated incidents rather than consistent resistance from residents. Follow-up research could investigate whether this is unique to Apeldoorn or a more common pattern in municipalities with a longer history of accommodating labour migrants.

The practice of avoiding inspections, combined with the criticism of the SNF quality mark (as voiced by a highly experienced advocacy organisation in the field), raises concerns about its actual effectiveness. There is a need for an independent and in-depth investigation into the various methods used by quality labels to conduct assessments and the extent to which these labels accurately reflect the living and housing conditions of labour migrants.

Developers have indicated that obtaining long-term permits is essential for making investments in high-quality housing. Research could explore the economic and social outcomes of long-term permits compared to municipalities that only issue short-term permits. This would support policymakers in assessing the potential impact of their licensing strategies.

At both the national and local levels, there is currently no clear understanding of the exact number of labour migrants residing in the municipality. Research into reliable estimation methods could help the municipality of Apeldoorn better map the scale of the issue and refine its vision and policy planning accordingly.

Lastly, another recurring theme is the economic dependence of employers on labour migrants to fill vacancies. Labour migrants are relatively low-cost and often poorly informed about their rights and obligations in the Netherlands. Future research could explore options for reducing this dependence and examine whether such jobs could be made more accessible to the domestic workforce instead.

5.2.2 Recommendations for Praxis

To begin with, the most important actor, the municipality of Apeldoorn. Apeldoorn will need to formulate an integrated vision regarding the issue of labour migrants. This vision should not only include housing but also all related peripheral issues, such as enforcement or exploitation. Furthermore, Apeldoorn must genuinely start assigning new locations within the municipality. Currently, many labour migrants reside in holiday parks or are scattered throughout the city. However, considering the

rising number of new labour migrants, the municipality will simply have to open a minimum of three new locations designated for their accommodation. This must be done properly, which includes having a daily property manager to also keep residents satisfied and thus build support in the neighbourhood. The municipality will also have to act more strictly against so-called 'false permanent residence.' It must conduct unannounced inspections to combat abuses, such as the rotation system between chalets described by a labour migrant. The development of the new permit system should be accelerated in this regard. Finally, the municipality of Apeldoorn will have to engage in intensive dialogue with companies, especially with new companies that intend to establish themselves in Apeldoorn and will use labour migrants in their business. Apeldoorn should devise a housing plan to be included with every permit application for establishing a new company that employs labour migrants.

Moving on to employers and employment agencies. Employers and employment agencies must take greater responsibility for the quality of housing they provide. Housing should no longer be viewed merely as a cost to be minimised. Both parties should be encouraged and eventually required to invest in decent, safe, and stable housing. They should also anticipate stricter inspections and consequences in the near future. Once legislation such as the WTTA comes into force, agencies may even risk losing their license to operate if they fail to meet housing standards. As part of its policy, the municipality of Apeldoorn could consider only working with certified employment agencies, for example, those affiliated with ABU or NBBU.

Finally, the real estate developers. Real estate developers should take a proactive role by initiating conversations with municipalities and proposing high-quality, long-term housing concepts for labour migrants. Including provisions such as a maintenance and property management clause for the next 25 years can significantly increase the municipality's willingness to cooperate. Such commitments directly contribute to solving this pressing social issue and demonstrate long-term accountability and care for both residents and the surrounding community.

6 Conclusion & Limitations

6.1 Conclusion

During this study, research was conducted into the following main question: “How do contextual factors influence the effectiveness of existing housing solutions for labour migrants in the municipality of Apeldoorn, and in what ways do these factors determine the overall suitability of these solutions?”

This chapter provides an answer to that question. The sub-questions were addressed individually in the previous chapter, ‘Discussion.’ The study examined the contextual factors that specifically influence housing policy for labour migrants in Apeldoorn. The conclusions and results are based on the input from interviewed respondents.

First, municipal policy and regulations play an important role in Apeldoorn. The research shows a significant lack of a clear and integrated vision for the housing of labour migrants. This currently leads to ineffective solutions, as there is no long-term perspective. This also affects the suitability of the offered solutions, since the municipality of Apeldoorn is still struggling with how and where to accommodate labour migrants.

National legislation and regulations also offer slight support to the municipality of Apeldoorn. The repeated postponement of mandatory certifications for employment agencies limits the possibility for municipalities to effectively act against rogue companies. At the local level, enforcement is a key aspect, for instance, monitoring permanent residence in holiday parks. Issues such as overcrowding or misuse of zoning designations also need to be addressed to foster appropriate solutions. In practice, however, enforcement appears to be difficult.

From an economic perspective, employers and employment agencies exert a strong influence on providing housing for labour migrants. They often aim to minimise costs, which frequently results in substandard housing or even exploitative situations. In Apeldoorn, no specific areas have been designated for labour migrants, which means that employment agencies and companies often determine for themselves where to house the workers. Villages within the municipality, such as Beekbergen and Uddel, are currently home to many labour migrants residing in holiday parks.

From a social perspective, there is slight integration, which often leads to dissatisfaction among residents. The municipality of Apeldoorn states that objections

from residents have a slight influence on housing policy, although they do often organise information evenings to reassure the local population. The stabbing incident at the holiday park, the negative public image, and the general lack of public support are not conducive to finding or implementing suitable housing solutions.

In summary, it can be concluded that contextual factors largely determine which housing solutions for labour migrants are effective and appropriate. The policy frameworks of the municipality of Apeldoorn are unclear, which prevents the implementation of suitable solutions. The economic context determines the practical feasibility and quality of the housing. The municipality of Apeldoorn needs to develop its own vision regarding the housing of labour migrants. In this, collaboration is the key element. When the municipality engages in dialogue with companies about how they arrange housing, more solutions can be developed together. The municipality should initiate these conversations early on, especially when large companies that will employ many labour migrants plan to establish themselves in the area.

Better regulation of registration within the municipality is also necessary, as it would give the municipality a clearer understanding of the number of labour migrants present. The municipality should shift more of this responsibility to employment agencies and employers while maintaining an ongoing dialogue with all parties involved. Monitoring is essential, but creating its own policies is just as important, as this provides structure and guidance for companies wishing to employ labour migrants. These contextual factors are thus not limited to the municipality alone. Rogue employment agencies and employers are also among the most significant factors contributing to Apeldoorn's lack of control over the housing situation for labour migrants.

This answers the central research question. What factors influence the housing solutions for labour migrants in Apeldoorn? By showing that especially the degree of cooperation between network partners, flexible application of regulations, and availability of suitable housing are crucial.

6.2 Limitations

The main limitation was choosing a case study approach. For example, with the focus on Apeldoorn as the only case study, only the municipality of Apeldoorn was discussed at the municipal level. Many national problems and factors are generalisable to other municipalities, but because, for example, the municipality of Apeldoorn does

not have a vision and policy on the subject, some outcomes are also only applicable to Apeldoorn. In addition, the campsites in Apeldoorn are highly important for labour migrants, but this does not necessarily relate to other municipalities as well.

In addition, the research follows a qualitative approach based on document analysis and semi-structured interviews. One limitation of this method is the absence of quantitative substantiation. For instance, there are no exact figures available on the number of labour migrants living in overcrowded conditions, the types of housing arrangements, or the extent of reported nuisance. Although such data is difficult to obtain, it could have contributed to a better understanding of the severity of the situation.

It might also have been a valuable addition to include the perspectives of residents living near the holiday parks. An attempt was made to approach the campsite managers first to facilitate this, but unfortunately, they did not respond. Nevertheless, residents could have contributed to the research by sharing their observations and experiences, particularly regarding whether they notice disturbances more frequently. A total of twelve interviews were conducted, covering a variety of perspectives. However, more perspectives could have been included by speaking with residents or by attempting to reach out to rogue businesses, which are often at the root of many problems. That said, contacting such companies for interviews proves to be a significant challenge.

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8 Appendices

8.1 Interview guide

Below is an example of an interview guide. Each interview guide has a slightly different approach and questions, as this naturally varies per respondent

1. Introduction and Purpose of the Conversation

Hello, my name is Jur Rouwenhorst and I am 24 years old. I am studying Spatial Planning, Land and Real Estate Development at Radboud University in Nijmegen. I am in the final year of my master's program and am currently writing my thesis, which is the final component of my studies. This interview is part of my thesis, for which I need to collect a significant amount of data to ultimately answer my main research question. Thank you again for your cooperation and time today!

First of all, I must ask for your consent to record this interview so that I can transcribe it later and use it in my data collection. The University requires me to keep your data private, and the information you provide will only be accessible to myself and my thesis supervisor from the University. Do you agree to me recording this interview?

Next, I would like to briefly tell you about my research and what this interview will cover. Although I have already sent you the interview guide, I will explain it in a bit more detail. I am researching the factors within the municipality of Apeldoorn that lead to certain choices being made regarding the housing of labour migrants. There are, of course, various influences, both external and internal to the municipality, that shape these choices.

Specifically, I am looking for different respondents for this study from various perspectives, which is why I have come to you. I am very curious to hear your story. Therefore, once again, I am glad that you are willing to participate in this interview. Do you have any questions beforehand, or shall I begin the interview?

2. Vision and Policy Frameworks for Spatial Planning

- Could you briefly introduce yourself? Who are you and what is your role within the municipality of Apeldoorn?

- I read that Apeldoorn is working on an integrated vision for labour migrants, which also includes their housing. Could you explain why a clear vision is currently lacking, how spatial planning is being integrated into this new vision, and what the concrete objectives and priorities are from your portfolio's perspective?
- What specific policy frameworks or instruments within spatial planning is Apeldoorn currently using for the housing of labour migrants? (e.g., zoning plans, environmental vision, etc.). Are there, for example, specific locations designated for labour migrants in Apeldoorn?

3. Spatial Challenges and Location Choices

- What do you see as the main challenges for the municipality of Apeldoorn in realising adequate housing for labour migrants?
- What spatial criteria does Apeldoorn use when designating suitable locations? (Consider the balance between concentration on business parks, distribution throughout the city, or locations in rural areas such as holiday parks).
- How does the municipality handle the often-conflicting interests of different stakeholders (residents, developers, employers) in the selection and development of housing locations?
- Is the issue of labour migrants perhaps not significant enough within the municipality to be a primary focus? Or do you believe it is indeed important to address this, given that Apeldoorn has a lot of employment that attracts labour migrants?
- Do you think the number of labour migrants could be reduced by requiring large companies to limit their numbers and perhaps telling them to seek more local workers?

4. Regulations, Permitting, and Enforcement

- Developers have indicated a preference for permits with a longer duration (e.g., 15-25 years) to make high-quality, temporary housing profitable. What is Apeldoorn's position on such terms, and what role does the new Environmental Act (Omgevingswet) play in this?
- The Good Landlordship Act (Wet goed verhuurderschap) and the Environmental Act offer municipalities new tools. How is Apeldoorn specifically

applying these when it comes to the quality and management of housing for labour migrants?

- Enforcing regulations against permanent or illegal residence by labour migrants in holiday parks (e.g., in Beekbergen and Uddel) is known to be complex. What specific spatial and legal instruments is the municipality using, or would it like to use, to get a better grip on this situation?
- A developer mentioned in a newspaper article in De Stentor where a campsite was forced to refuse labour migrants and the investor was fined, stated that the municipality sometimes adheres rigidly to existing zoning and has difficulty thinking "out of the box" for new housing locations. How flexible can and is the municipality willing to be with zoning to enable housing for labour migrants?
- Various parties have opinions on certifications like the SNF (Foundation for Flexible Housing Standards) quality mark. Does the municipality of Apeldoorn apply specific quality standards (such as the Roemer standard of one person per room, or a minimum square meterage) when assessing housing plans?

5. Collaboration and Governance

- How is the collaboration with private developers and housing providers proceeding? How do you reflect on the fact that some parties claim that discussions are often tedious or that the municipality is unwilling to think along in certain respects?
- The province of Gelderland emphasizes that employers must take greater responsibility for housing. How can spatial policy (for example, when new companies establish themselves or existing ones, like in the meat processing industry, expand) contribute to this?
- One sometimes reads that it is difficult for municipalities to know which labour migrants are residing in their area, or that they are sometimes not even registered. What are your experiences with this, and can this be prevented or resolved beforehand?
- In your opinion, who holds the responsibility for housing labour migrants? Is it the municipality, which oversees general policy and enforcement? Is it the employment agencies that bring them in, or is it the employers who should provide housing?

- Apeldoorn is part of the Stedendriehoek (Urban Triangle) region. How does the regional cooperation on the housing of labour migrants' function? Is there, for example, work being done on a "fair share" distribution of the housing task, as advocated by the province?
- Is there any European or national legislation that hinders the municipality of Apeldoorn from properly addressing the housing of labour migrants? Or are you lacking certain types of instruments?

6. Social Aspects and Liveability

- The NIMBY ("Not In My Backyard") effect is often cited as an obstacle. What strategies does the municipality of Apeldoorn use to create social acceptance for the housing of labour migrants and to deal with potential resistance from residents?
- How does the municipality take into account the liveability and safety at and around housing locations for labour migrants, especially considering the incidents that have been mentioned?

7. Future Vision and Solutions

- From a spatial planning perspective, what does the municipality of Apeldoorn need from the provincial or national government to implement more effective policies? (Consider regulations, funding, and authority.)
- What concrete (spatial) solutions do you see as most promising for structurally improving the housing situation for labour migrants in Apeldoorn?
- What factors currently have the greatest influence on the housing policy for labour migrants within the municipality of Apeldoorn? (e.g., residents, legislation, collaborations?)

8. Closing

- Do you have any further additions or points that you consider essential for this research that has not yet been discussed?
- Thank you very much for your time and cooperation.

8.2 Actors independencies

Actors	Primary interest	Main resources/power	Main interdependencies with other actors	Key challenges
Public actors <u>Municipality of Apeldoorn</u>	Public order, social cohesion, economic development, quality of life, compliance with legislation	Regulatory power, spatial planning, licensing, enforcement capacity, local knowledge, coordinating role (meta governance)	Dependent on employers for economic activity and information. Dependent on government/province for frameworks and resources. Dependent on developers for housing supply. Dependent on residents for support	Balancing economic development with social cohesion; lack of unified vision; limited enforcement capacity; reactive vs. proactive policymaking.
<u>Province of Gelderland</u>	Regional development, supervision and inter-municipal coordination	Subsidies, provincial policy, mediation role	Influences municipal policy, dependent on municipalities for local implementation	Facilitating role rather than strong supervisory; achieving effective regional coordination among diverse municipalities.
<u>Government of the Netherlands</u>	National policy (labour migration/housing), legislation about Environment and Planning act and WTTA	Legislative power, budgetary resources, national coordination	Sets frameworks for municipalities and provinces, local authorities for implementation and enforcement	Slow implementation of national policies (e.g., WTTA); balancing national objectives with local realities and capacities.
Private actors <u>Employers</u>	Access to flexible and cheap labour, continuity of business operations, cost minimalization in labour and housing	Jobs, economic investments, financial resources, sometimes housing arrangements for labour migrants	Depending on the municipality for permits and cooperation. Depending temporary on job agencies. Depending on labour migrants for work. Depending on housing providers for accommodation staff	Tension between cost minimization and providing adequate housing/working conditions; taking responsibility for housing needs.
<u>Job agencies</u>	Recruitment and placement of labour migrants, flexibility, profit margin, often also housing provision	Access to labour migrants, networks in countries of origin, logistical capacity for housing	Dependent on employers for assignments. Dependent on labour migrants for work. Dependent on housing providers for supply. Subject to municipal and national regulations.	Distinction between bona fide and rogue agencies; impact of WTTA; potential for housing as a 'profit model' vs. 'cost centre'; ensuring compliance with PKS and SNF.
<u>Real estate developers and landlords</u>	Return on investment, exploitation of real estate, meeting demand	Real estate, capital, development and management expertise	Depending on the municipality for permits and zoning plans. Depending on demand from employers, job agencies and labour migrants. Dependent of financing	Need for long-term permits for ROI vs. municipal caution; quality of housing provided; role in both creating and solving housing shortages.
<u>Housing corporations</u>	Social housing, affordability, more for the long-stay labour migrant, limited for short-stay labour migrants because of policy	Real estate ownership, expertise social rental, social objective	Limited role for temporary labour migrants, but potential for long-stay settled labour migrants. Cooperation with the municipality for social tasks	Regulatory limitations for housing temporary labour migrants; long waiting lists for regular housing seekers.

<p>Civil Society</p> <p><u>Labour migrants</u></p>	<p><i>Adequate, affordable and safe housing, fair treatment, job security, well-being, integration yes or no</i></p>	<p><i>Workforce, sometimes experiential knowledge and potential a collective voice</i></p>	<p><i>Dependent on employers for work. Dependent on job agencies/landlords for housing. Dependent on municipalities for protection and facilities. Dependent on interest groups for support.</i></p>	<p><i>Vulnerability to exploitation; lack of information on rights; limited bargaining power; impact of poor housing on well-being.</i></p>
<p><u>Advocacy companies for labour migrants</u></p>	<p><i>Improving the position and rights of labour migrants, identifying abuses, influencing policy</i></p>	<p><i>Expertise, networks and public mouthpiece</i></p>	<p><i>Dependent on information from labour migrants. Cooperation between governments and employers for solutions</i></p>	<p><i>Gaining sufficient influence in policy networks; ensuring migrant voices are heard and acted upon.</i></p>
<p><u>Residents</u></p>	<p><i>Maintaining quality of life, safety, preventing nuisance, maintaining the value of their own home, social cohesion</i></p>	<p><i>Local knowledge, political influence through city council, possibility of objection procedures</i></p>	<p><i>Influencing municipal policy and concrete projects. Interaction with the municipality, developers and sometimes indirectly with labour migrants</i></p>	<p><i>NIMBY-effect vs. need for housing solutions; balancing concerns about nuisance with integration objectives.</i></p>
<p><u>SNF/Foundations for housing standards</u></p>	<p><i>Certification and standardization for housing</i></p>	<p><i>Quality mark, framework of standards, inspection capacity</i></p>	<p><i>Influences the quality of the housing supply, interaction with housing providers, employment agencies, employers.</i></p>	<p><i>Effectiveness of certification in practice; criticisms regarding circumvention of inspections and actual quality assurance; ensuring the label reflects true living conditions.</i></p>

Table 2: Dependency actor's network (Own work, 2025).