Housing and the welfare state: changing perspectives and a research agenda

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Abstract

The relationship between housing and the welfare state is a heavily researched topic in international comparative housing research. This exploratory paper provides a historical overview of the academic debate. For a long time, the discussion primarily focused on the degree and the nature of government intervention within the field of housing. Various scholars have contributed to this discussion by presenting housing policy related typologies of housing systems, or by applying welfare state regime typologies to the field of housing. In recent years, attention has also been paid to the financial aspects of the housing system. Housing was increasingly considered as the basis for so-called asset-based welfare. Furthermore, alternative typologies of housing systems, based on financial factors rather than on state interventions, were developed.

In recent years, welfare systems and housing systems were influenced by some new trends: the Global Financial Crisis, an increasing influence for European Union regulations and the rise of multi-level welfare states. In the last part of the paper, these new trends will be translated into a research agenda.

Keywords: welfare system, housing system, international comparative research, research agenda

1. Introduction

Welfare state research has a long tradition and has resulted in a large research output. However, housing plays no or at best a minor role in much of this output. At the same time, welfare state research has considerably influenced international comparative housing research. It sometimes seems as if welfare research can do without housing research, but housing research cannot do with welfare state research. This may have to do with the relatively limited impact of scientific housing research, and the ambiguous position that housing has within the welfare state. Possibly, the proportion of housing researchers that considers housing as an important element of the welfare state is much high higher than the number of welfare state researchers that feels the same. Testing this hypothesis falls beyond the scope this paper, but would be an interesting topic for further research.

But also within housing research there has been debate about the position of housing within the broader context of the welfare state. That is why this paper starts with a discussion of this topic. In the sequel of this paper, I will show how the research on housing and the welfare has developed in the course of time. As far as this concerned, two main strands of research may be discerned: a convergence approach and a divergence approach. Although elements of both strands are still visible in contemporary international comparative housing, each strand of research may be considered as representative for a particular time period.

Structure of the paper

The paper is structured as follows:

- Section 2 describes the academic debate with regard to the relationship between housing and the welfare state.
- Section 3 deals with the *convergence approach*. This approach was very influential in the 1970 and 1980s when it was generally thought that both welfare and housing systems would ultimately converge
- In the late 1980s, it became clear that the differences between welfare states and housing systems were more structural than previously thought. This line of thinking forms the basis for the so-called *divergence approach* that is described in Section 4. Important theories within this approach are Esping-Andersen's welfare state regime theory and typology (1990), as well as Kemeny's theory and typology of rental systems (1995)
- The work of Esping-Andersen and Kemeny has had a significant influence in international comparative housing research. In relation to this, I will describe the main conclusions of my PhD-thesis in which I tested the extent to which these frameworks constitute a valuable basis for explaining housing policies and housing outcomes (Section 5).
- In recent years, welfare systems and housing systems were influenced by some new trends: the Global Financial Crisis, an increasing influence for European Union regulations and the rise of multi-level welfare states. In Section 6, these new trends will be described and translated into a research agenda.

2. Housing and the welfare state

It is generally acknowledged that welfare states are supported by four pillars: social assistance/ social security and pensions, healthcare, education and housing. In all these four pillars there is a considerable state influence and de-commodification. De-commodification can be defined as the extent to which households can use a particular welfare service, independent of the income they acquire on the labour market. However, in the housing sector the de-commodification is less obvious than in the other welfare state pillars. According to Harloe (1995), housing has different characteristics than health, education, or income support. As a tradable commodity, housing occupies a central position in the capitalist economy. Consequently, a permanent large-scale decommodification of housing will meet serious resistance from vested capitalist interests and is therefore unlikely (Harloe, 1995, p. 537).

Kemeny (2001) also stresses the specific position of housing compared to the other welfare sectors. He argues that housing, unlike the other pillars, is characterized by a high capital intensity and, depending on the country concerned, a strong private-sector involvement. While the other three pillars are often, though not always, provided by the state and paid for out of taxation, housing tends to be provided by the private sector. Some housing has been directly provided by the central or local government, some by non-profit organizations that are regulated by the government. But this only serves a minority (generally less than half) of the population, and even then it is provided at a price charged to consumers that covers a much higher proportion of the costs than is the case in education and healthcare (Kemeny, 2001, p. 55). It is for these reasons that Torgersen (1987) refers to housing as 'the wobbly pillar under the welfare state'.

Although Harloe and Kemeny both acknowledge the specific position of housing within the welfare state, they draw completely opposite conclusions from this observation. Harloe states that welfare state regime types that are developed with reference to non-housing aspects of social policy are not useful in studying housing markets and policies comparatively (Harloe as cited by Kleinman, 1996, p., 179). Kemeny, on the other hand, sees the housing sector as a crucial part of the welfare state. According to him, the critical importance of housing is best illustrated by looking at some of its effects on other welfare sectors. For example, Kemeny argues that owner-occupation undermines support for a universal state-regulated health insurance and pension system (see Kemeny 2001 and 2005). Back in the 19th century, the battle against diseases and epidemics was the most important reason for many West European governments to start interventions in the housing market. Also today, housing policy operates as a vehicle to reach policy goals across a broad spectrum of policy areas including social integration, environmental policy, spatial policy, and labour market policy (Boelhouwer and Hoekstra, 2012).

The difference of opinion between Harloe and Kemeny might be attributed to their differing definitions of the welfare state. Harloe seems to take a rather narrow view of it as a set of public services operating outside (or largely outside) the market. This means that, as far as housing is concerned, he mainly focuses on the public or social rented sector (Hoekstra, 2010). Kemeny's definition covers not only the welfare services provided by the government, such as subsidized housing, he also considers how the private sector, e.g. the owner-occupancy sector, relates to the non-housing parts of the welfare state, assuming that these relationships are strong (Malpass, 2008, p. 2). Such a broad approach is also advocated by Allen et al. (2004). These authors prefer to speak of a welfare system rather than of a welfare state because welfare services may also be provided by private actors or the family. A welfare system can thus be defined as a specific configuration of the state, the market, and the family that delivers welfare services to households and individuals (Allen

et al., 2004, p. 265). Allen et al. see housing as an important and integral part of such a welfare system. The vision that housing should be seen as an important element of the welfare state or welfare system is also shared by other contemporary international comparative housing researchers such as Groves et al. (2007) and Ronald (2008). As the latter (p.11) states:

Housing constitutes a welfare good in itself in terms of shelter, but it also forms the basis of how households use and share other welfare goods. It acts as a store of resources in terms of use, asset, and exchange, and spatially constitutes the point of exchange of goods and welfare services between family members.

In this paper, I concur with the broad definition of the welfare state and the welfare system outlined above. Accordingly, I consider housing an important element of such a state or system¹.

3. Convergence of welfare and housing systems

Convergence of welfare systems

In the 1960s and 1970s, welfare state research was dominated by the so-called convergence approach. In this approach, it was envisaged that all welfare states would follow the same development path, under influence of broad processes such as capitalism (*logic of capitalism*), modernisation (*logic of modernisation*) or industrialisation (*logic of industrialisation*). A relationship is therefore presumed between the level of economic and societal development and the level of public expenditure on welfare. Economic progress, it was thought, will ultimately undermine traditional structures of welfare provision, including assistance offered by families, the private sector, and charitable institutions (Boelhouwer and Hoekstra, 2012). This implies that differences between welfare states should merely be interpreted as differences in the process of modernization and economic development.

Convergence of housing systems

Within housing research, Donnison has embraced the convergence approach, and more particularly the logic of industrialisation (Doling, 1997). In his 1967 book *The Government of Housing*², Donnison states that general economic and demographic processes will cause housing policies to converge between countries, irrespective of international differences in political orientation or institutional structure. As industrial development progresses, housing policy will become more extensive, interventionist and complex. This is necessary in order to achieve government goals with respect to availability, quality and affordability that are formulated as a response to rising aspirations and expectations of an increasingly affluent society (Boelhouwer and Hoekstra, 2012). The most influential and comprehensive convergence theory within international comparative housing research was couched in Harloe's book *The People's Home* (1995). There, Harloe used a neo-Marxist framework to explain the development of national housing systems. He argued that

¹ In this paper, as in much of the literature, the terms 'welfare state' and 'welfare system' are used interchangeably.

government intervention in the housing sector depends on the profitability of housing to private

² In 1982, Donnison and Ungerson published a modified version of the 1967 book. In this book they somewhat loosen and nuance the convergence expectations of the 1967 book.

capital, with all countries eventually passing through the same phases of commodification, decommodification, and recommodification. In periods of low profitability for private investment, the state intervenes and provides social rented housing; this process is reversed once conditions favorable to profit-making are re-established.

Based on this argument, Harloe discerned two basic models of social housing: a residual model and a mass model. The former describes social housing that has been produced through small-scale programs and that is destined for the poorest groups in society, which means that a stigma is attached to it (Doling, 1997). The latter model refers to large-scale building programs for social rented dwellings that are subsidized by the state. In this model, social rented dwellings are destined not only for the poor but also for the middle classes, which implies that the level of stigma is considerably less. In Harloe's view, the residual model should be considered the 'normal' housing model. The mass model only applies to periods of crisis and/or restructuring, when the market sector is temporarily unable to provide housing in a profit-oriented manner (Van der Heijden, 2002, 2012). The convergence approach is still influential. Recent studies in the field stress that the pressures of globalization, international competition, and fiscal austerity will lead to an almost inevitable retreat of the welfare state (see Genschel, 2009 for an overview).

4. Divergence of welfare and housing systems: towards typologies

The convergence approach, with its emphasis on the search for similarities, has been criticized for ignoring specific contexts, specific institutions, or specific politics (Hantrais, 1999). What is more, the approach lacked support by the empirical data. In the 1980s and 1990s, it became increasingly clear that, despite rather general economic growth, welfare and housing systems were not converging. The differences between developed countries with respect to their welfare and housing system turned out to be structural and persistent. In reaction to these developments, the so-called divergence theories became increasingly popular in the 1980s and 1990s. While such theories acknowledge that social reality is context-dependent, they also accord the context itself importance as an explanatory variable and an enabling tool, rather than dismissing it as a barrier to effective cross-national comparison (Hantrais, 1999, p. 94). The view that institutionalised relationships and structures within the housing system themselves become formative of new structures over time has led to the proposition that housing and welfare systems may be expected to diverge to an increasing extent (Milligan, 2003, p. 37). Divergence theories tend to use typologies derived from cultural, ideological, or political theories as the basis for understanding differences between groups of societies (Kemeny and Lowe, 1998, p.171).

Table 1 The welfare state typology of Esping-Andersen, with the addition of a Mediterranean welfare state regime

	Liberal welfare state regime	Social-democratic welfare state regime	Conservative- corporatist welfare state regime	Mediterranean welfare state regime
Decommodification: extent to which a regime promotes an acceptable standard of living independent of one's market value	Low	High	Medium	Low
Stratification: does the welfare state increase or decrease differences between groups of civilians?	Welfare state increases differences	Welfare state decreases differences	Welfare state reproduces existing differences	Welfare state reproduces existing differences
Income distribution and poverty	Large income differences, relatively high incidence of poverty	Small income differences, relatively low incidence of poverty	Medium income differences, medium incidence of poverty	Large income differences, relatively high incidence of poverty
Unemployment Arrangement between state, market, and family	Relatively low Dominant position of market parties	Relatively low Dominant position of the state	Relatively high Important position for the family, considerable influence of private non-profit organizations	Relatively high Dominant position for the family
Countries (EU countries only)	United Kingdom, Ireland	Denmark, Sweden, Finland	Belgium, Germany, France, Austria, Netherlands ³	Italy ⁴ , Spain, Portugal, Greece, Malta

Sources: Hoekstra, 2010; Vrooman, 2009

The theory and typology of Esping-Andersen

Within international comparative welfare research, the divergence theory and typology of Esping-Andersen (1990) has acquired a rather dominant position. According to Esping-Andersen, one should not speak of the welfare state, since different welfare states have different characteristics. He argues that there are three ideal typical welfare state regimes (liberal, conservative-corporatist, and social-democratic) that differ fundamentally from each other (see table 1). The background of these differences can be found in historical factors such as the way in which labourers were mobilized, the coalitions between political parties and the historical support among the population for the development of the welfare state (Esping-Andersen, 1990, p. 29). According to Iversen and Soskice (2006) and Manow (2009), these factors are strongly influenced by the electoral system that is present in a country.

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³ It should be noted that the Dutch welfare regime is a hybrid case that has both corporatist and social-democratic characteristics.

⁴ Italy is often seen as straddling the Mediterranean and conservative-corporatist regimes, both socially and geographically. While the north of Italy is part of the central conservative-corporatist core of the European Union, the south retains many features of Mediterranean welfare states (Barlow & Duncan, 1994, p. 30).

Esping-Andersen states that the differences between the three regime types also determine the future development of their constituent welfare states (*path dependency*). In relation to this future development, Pierson (1996) observes that modern welfare states offer employment to large groups of people who tend to be united in powerful and well-organized lobby groups. These groups often use their influence to plea for the conservation of existing welfare state institutions, because this is in their own interest. Consequently, welfare state restructuring tend to result in gradual adaptations rather than in radical changes.

This is in line with the findings of Vrooman (2009) who has used a categorical principal component analysis to test Esping-Andersen's typology. No less than 54 variables that together present a fairly complete empirical operationalization of Esping-Andersen's welfare state regime types were included in the analysis, with all data referring to the early and mid-1990s. The results of this analysis show that the welfare state regimes that were identified by Esping-Andersen (based on data from the early 1980s) still existed in the 1990's.

In the original theory and typology of Esping-Andersen, the Mediterranean EU countries (with the exception of Italy, which was classified as a corporatist welfare state regime) were left out of the picture. In reaction to this omission, several researchers (for example Barlow and Duncan, 1994; Ferrara, 1996) proposed formulating a 'new' welfare state regime for the Southern European countries. In this paper, that new regime type is called the 'Mediterranean welfare state regime'. Represented by Portugal (although strictly speaking not a Mediterranean country), Spain, Italy, Greece, and Malta (see also Vakili-Zad, 2007), the Mediterranean regime distinguishes itself from the other types mainly by its strong degree of familialism. This implies that disproportionately many of the welfare tasks are carried out within the family and without much interference from the market or state (Barlow and Duncan, 1994, p. 30).

The theory and typology of Kemeny

The most influential exponent of the divergence approach in housing research is surely Kemeny (1992, 1995). In *Housing and Social Theory* (1992), Kemeny developed a theoretical framework for international comparative housing research that is grounded in the dichotomy between collectivist and privatist ideologies. Kemeny associates advanced industrial homeownership-dominated societies with an ideology of privatism and a residualization of welfare. Conversely, advanced industrial societies with a sizable rental sector are associated with an ideology of collectivism and a commitment to welfare provision. Thus, the tendencies towards collectivism or privatism in a society are closely aligned with the organization of the housing system. There are a number of ways in which this alignment will manifest itself, but two are crucial: the social forms that emerge around the ownership of housing; and the spatial consequences of the dominance of one or more dwelling types (Kemeny, 1992, p. 125).

Kemeny expands and refines these ideas in *From Public Housing to the Social Market* (1995). There, analyzing the rental sector, he makes a distinction between unitary rental systems (collectivist ideology) and dualist rental systems (privatist ideology). In societies with a unitary rental system⁵,

⁵ The terms 'unitary rental system', 'unitary rental market', 'integrated rental system', and 'integrated rental market' are often used interchangeably in the housing literature, as well as in Kemeny (1995). However, in Kemeny et al. (2005), a distinction is introduced between unitary rental markets and integrated rental markets. There, the former are defined as markets in which barriers to non-profit providers competing on the rental market are removed. Initially, such a rental market needs to be rather heavily regulated by the government in

market are removed. Initially, such a rental market needs to be rather heavily regulated by the government in order to give the non-profit sector the opportunity to grow and develop. The term 'integrated rental market' is

market rental and social rental dwellings are subject to similar regulations, have more or less equal rent levels, and compete with each other on a single market. The proportion of apartments is expected to be relatively high in these societies.

Societies with a dualist rental system, on the other hand, are characterized by a rental market in which the social rental and the market rental sector are strictly separate. In such societies, the social rental sector is usually relatively small, primarily destined for (very) low-income groups, and strongly controlled by the government. Single-family dwellings are the dominant dwelling type in these societies. Kemeny underpins his theory and typology with references to the rental markets of a limited number of countries, mainly Western European (in the form of case studies). He does not refer to the rental markets of Southern European countries, however.

Table 2 presents the main differences between dualist rental systems and unitary rental systems.

Table 2 Features of dualist and unitary rental systems

	Dualist rental system	Unitary rental system
Political structure	Non-corporatist (liberal welfare	Corporatist (social-democratic and
	state regimes)	conservative-corporatist welfare
		state regimes)
Ideology	Privatist	Collectivist
Size of the rental sector	Relatively small	Relatively large
Competition between social rental	No direct competition between the	Direct competition between the
sector and market rental sector	two rental sectors	two rental sectors
Rent levels	Large differences in rent level	Relatively limited differences in
	between market rental dwellings	rent level between social rental
	(relatively expensive) and social	dwellings and market rental
	rental dwellings (relatively cheap)	dwellings (rents are moderate in
		both sectors)
Function of social rental sector	Safety net	Housing for broad segments of the
		population
Subsidies and regulation	Large differences between a	Relatively limited differences in
	strongly subsidized and heavily	regulation and subsidies between
	regulated social rental sector and a	the social rental sector and the
	market rental sector with few or	market rental sector
	no subsidies and regulation	
Proportion of apartments	Relatively low	Relatively high
Countries (European countries	Norway, Belgium, Finland, Ireland,	Austria, Sweden, the Netherlands,
only, based on Kemeny, 2006)	Italy, United Kingdom	Denmark, Switzerland, Germany,
		France

Source: Hoekstra, 2010

reserved for markets in which non-profit providers are sufficiently developed to be able to compete with the for-profit sector without a need for such government regulation. As such, an integrated rental market can be seen as the final stage in the development of a unitary rental market. However, until now, fully integrated rental markets have never existed in reality in Europe.

5 Applying the frameworks of Esping-Andersen and Kemeny in housing research

In my PhD-thesis, which was completed in 2010, I have attempted to test to what extent the divergence theories and typologies of Esping-Andersen and Kemeny offer a valuable framework for explaining international differences in housing policies, housing outcomes, and housing market developments. The thesis consists of six published papers. All use the divergence theories and typologies of Esping-Andersen and Kemeny, or at least some aspects of these, as a tentative explanatory framework.

Since their formulation in the 1990s, the theories and typologies of Esping-Andersen and Kemeny have dominated the debate in international comparative housing research. Nevertheless, there were still significant gaps in knowledge concerning their explanatory power when I started my PhD-research in 2002. At that time, most of the debate took place at a conceptual or theoretical level. The theories and typologies of Esping-Andersen and Kemeny had hardly been tested against empirical housing data. In my thesis, I have make an attempt to fill this gap. Of course, I am not the only housing researcher who has tried to do so. After 2002, several others took up this challenge as well (Domburg-De Rooij and Musterd, 2002; Matznetter, 2002; Hulse, 2003, Allen et al., 2004; Arbaci, 2007; Stamsø, 2008; Van Gent, 2009). All these scholars have linked Esping-Andersen's welfare state regime typology to the housing system. However, doing so they focused on particular countries or welfare regimes; alternatively, they focused on specific elements of the housing system such as segregation, urban restructuring, the market rental sector, or neighborhood regeneration. My approach has been more comprehensive. In my thesis, I have attempted to cover as many elements of the housing system as possible. Furthermore, by selecting a broad range of countries, I tried to do justice to the variation between countries and welfare state regimes.

A second gap in international comparative welfare and housing research around 2002 concerned the relative inattention to the Southern European EU countries, both in empirical research as well as in theory-building. In fact, these countries are not included in the empirical analyses that underlie the typologies of both Esping-Andersen and Kemeny. In an attempt to fill this gap, I have included the Mediterranean EU-countries in most of my analyses.

The PhD-thesis was structured around the following two research questions:

- 1. To what extent does the divergence theory and typology of Esping-Andersen offer a good framework for analyzing the characteristics and the development in time of housing policies?
- 2. To what extent do the divergence theories and typologies of Esping-Andersen and Kemeny offer a good explanation for the differences between countries with regard to measurable housing outcomes (tenure, dwelling type, housing quality, characteristics of tenants, rent levels, housing satisfaction)?

5.1 Esping-Andersen's typology as a framework for analysing housing policies

In Hoekstra (2003) I have translated Esping-Andersen's welfare state regime typology into a housing policy regime typology. The latter distinguishes three ideal typical housing policy regimes: social-democratic, (conservative) corporatist, and liberal (see table 3). Dutch housing policies of the 1980s and 1990s were compared with this housing policy regime typology in order to determine in which type they would fit best. It turned out that in the 1980s, Dutch housing policy had both social-democratic and corporatist traits, whereas in the 1990s the corporatist traits were dominant (see

table 2 and 3 in Hoekstra 2003 for more details about this). These research findings are largely in line with the position of the Netherlands within the welfare state regime typology of Esping-Andersen. In this typology, the Dutch welfare state is a hybrid case, since it has both social-democratic and corporatist characteristics. However, there is one aspect to which the Esping-Andersen framework seems less applicable. Although the Dutch housing policies in the 1990s had many corporatist traits, they were not conservative.

In my opinion, the increasing importance of corporatist characteristics in Dutch housing policies in the 1990s is related to the changing role of the government. From the 1980s to the 1990s, there was a significant reduction in the direct influence of the central government on the Dutch housing system. The central government switched to a more indirect style of governance. Within the national policy framework, local authorities and private actors such as housing associations could operate with a certain degree of freedom. This new style of governance can certainly be considered corporatist (whereby policy is developed jointly by central government, local authorities, and private actors). Yet it has little to do with conservatism, whereby housing policies would seek to preserve the status differentials in society and favor the traditional family. I have used the term 'modern corporatism' to indicate this new style of policy. In practice, modern corporatism resembles concepts such as 'third way politics' (Giddens, 1998) and 'competitive corporatism' (Rhodes, 2001).

The question is to what extent my housing policy regime framework also applies to other countries. Below, I attempt to answer this question for both Belgium (Flanders) and Norway. So far, these are the only other countries to which my housing policy regime framework has been actively applied in research projects.

Table 3: Differences between the housing systems of the three welfare state regimes

Criterion	Social-democratic	Corporatist	Liberal
De-commodification Stratification	LargeRelatively low	Quite large High, mainly based on social status	LowHigh, mainly based on income
Mix of State, market and family	• Dominant position of the State	 Important position for the family Considerable influence for private non-profit organisations 	Dominant position of market parties
State regulation	Strong central government influence	 Functional decentralisation, incremental, problem-solving policies 	 Relatively little State regulation (at both central and local levels)
General housing policy objectives	Guaranteed universal high level of housing quality	 Preservation of the social stratification in society Preferential treatment of the traditional family Stimulation of households and other private actors to take initiatives on the housing market 	 Dominant position for the market State only supports marginal groups
Subsidisation	 Large-scale production subsidies Subject subsidies for large target groups 	 Segmented subsidies; specific arrangements for specific groups 	Means-tested subject subsidiesFew production subsidies
Price setting and price regulation	Strong State influence on price setting and price regulation	Moderate State influence State regulation of prices to correct negative effects of the market	Market determination of house prices
Housing allocation	• Allocation on the basis of need	 State intervention to correct the market Certain groups may be favoured in the allocation process 	 Market determination of housing allocation in a large part of the housing stock Regulated allocation in a small part of the housing stock. (reserved for low-income groups)
Organisation housing provision	 Strict spatial planning State takes initiative for the production of newly built houses 	 Moderately strict spatial planning Private actors (households, small companies) take the initiative for the production newly built houses 	 No strict spatial planning Private actors (mainly big companies) take the initiative for the production newly built houses

Source: Hoekstra, 2003, p. 63

Belgium

In Hoekstra and Reitsma (2002) my housing policy regime typology was applied to the conservative-corporatist welfare state regime of Belgium. Also here, a distinction was made between the 1980s and the 1990s. Belgium has a small social rental sector (7% of the total housing stock at the end of the 1980s) that is rather heavily regulated. At the same time, the market rental sector is substantial in size (25% of the total housing stock at the end of the 1980s) and subject to relatively little regulation. Such disparity between the two rental tenures is characteristic of a dualist rental system Dualist rental systems are expected to be found in liberal welfare state regimes.

Nevertheless, Belgian housing policy of the 1980s and 1990s was certainly not completely liberal. Many corporatist elements could in fact be distinguished in the owner-occupancy sector. First of all, there was a segmented system of premiums and social loans for owner-occupiers that aimed to promote households' ability to cope for themselves. Second, self-provided housing was an important element of the housing production, which may also be seen as a feature of corporatism (see Barlow

and Duncan, 1994, p. 32 and onwards). In Belgium, unlike the Netherlands, corporatist elements in housing policy also had a clearly conservative dimension. Owner-occupiers with children were entitled to specific (more favorable) loans and premiums. And there were special regulations for specific occupational groups, such as mine workers.

In short, Belgian housing policy can be interpreted as a mix of liberalism and conservative-corporatism. The policies for the rental sector had a strong liberal dimension, whereas the policies for the owner-occupancy sector were largely conservative-corporatist. In this respect, little had changed between the 1980s and the 1990s. This might be related to the fact that housing policies in Belgium tend to have an incremental and problem-solving character, which makes it difficult to carry through fundamental policy changes. Such policy-making is characteristic of a conservative-corporatist welfare state regime.

Norway

In the typology of Esping-Andersen, Norway is regarded as a prototype of the social-democratic welfare regime (Esping-Andersen, 1990, pp. 73-76); the public sector is large, with universal welfare services financed by taxes. Consequently, Norwegian society is characterized by relatively small income inequalities. The Norwegian welfare state is known for combining high levels of public expenditure, which creates generous welfare state entitlements, with rapid economic growth, low unemployment, and high levels of labor force participation, particularly for women (Stamsø, 2008, p. 6). Despite some restructuring and retrenchment measures, most of these characteristics still persist nowadays (Stamsø, 2008, p. 9). The question is to what extent these social-democratic characteristics are also visible in the housing system.

In order to find an answer to this question, Stamsø (2008) has analyzed the Norwegian housing policies for both 1980 and 2005, using my housing policy regime framework as a theoretical basis. She concludes that in 1980, Norwegian housing policy was largely social-democratic in character. Universal housing policy goals were implemented by regulating house prices, interest rates, and rents; moreover, subsidies were available for the large owner-occupied sector (Stamsø, 2008, p. 11). In Norway, social-democratic objectives were pursued in the homeowning sector and the cooperative sector rather than in the social rental sector (as is the case in most social-democratic countries). One of the key goals of Norwegian housing policy was that the distribution of housing should be more equal than the distribution of income. In order to achieve this goal, Norwegian homeowners and would-be homeowners could get subsidies and cheap loans through the Norwegian State Housing Bank. These subsidies were provided in such a way that they had a redistributive effect. The residents in the cooperative sector (19% of the total housing stock in 1981) could also apply for cheap loans from the State Housing Bank. Moreover, housing cooperatives had access to land at below-market prices. In 1980, the prices of cooperative dwellings were strictly regulated and these dwellings were allocated according to membership criteria (seniority). As a result of these policies, both the owner-occupied and the cooperative sector were rather strongly decommodified, which Stamsø interprets as a social-democratic trait.

Between 1980 and 2005, the social-democratic characteristics of Norwegian housing policies were largely replaced by liberal traits. Deregulation of the credit market and the abolition of large-scale subsidies for owner-occupation marked a major change in Norwegian housing policy. A publicly financed owner-occupation sector was transformed into a privately financed sector based on market terms. Housing policy expenditure decreased and policy measures became more closely targeted at lower-income groups. These measures mainly took the form of subject subsidies (housing

allowances). In the cooperative sector, the principles of price regulation and rules of allocation were gradually abolished (Stamsø, 2008, p. 19). The liberal features of current Norwegian housing policy contrast with the other pillars of the Norwegian welfare state, which are still mostly social-democratic.

Table 4 The welfare state regime and the housing policy regime in the Netherlands, Belgium (Flanders), and Norway

	Welfare state regime according to Esping-	Housing policy regime 1980s	Housing policy regime 1990s (2005 for Norway)
	Andersen (1990)		
Netherlands	Mix of conservative-	Mix of corporatism and	'Modern corporatism'
	corporatism and social-	social-democracy	
	democracy		
Belgium (Flanders)	Conservative-corporatist	Mix of liberalism and	Mix of liberalism and
		conservative-corporatism	conservative-corporatism
Norway	Social-democratic	Social-democratic	Liberal

Source: Hoekstra, 2010

Towards a synthesis

Table 4 shows the relationship between the welfare state regime and the housing policy regime for the three countries discussed above. Although some correspondence between these two regimes is apparent, their interrelationship is far from univocal. In several cases, the characteristics of the housing policy regime are different from those of the welfare state regime. In my opinion, this might be due to the fact that there is a strong interrelationship between housing policies and the other domains of the welfare system. This idea has been particularly developed by Stephens et al. (2010) and Stephens and Fitzpatrick (2007), who state that the relationship between welfare state regimes and housing systems is bilateral rather than unilateral. On the one hand, the welfare state regime clearly exerts an influence on the housing system; it defines the parameters within which housing systems and housing policies operate. On the other hand, the housing system is certainly not a passive victim of the welfare state regime but itself exerts an independent influence on this regime. According to Stephens et al. (2010), the functions that are carried out by the housing system partly overlap with those of the other sectors of the welfare state regime. Hence, the housing system may either accentuate or soften the outcomes of these other sectors.

Housing allowances, for example, cushion the effects of policies in the field of social assistance and social security. This is clearly visible in the United Kingdom, which has a housing benefit scheme that provides up to 100 per cent of the rent costs. As a consequence, the social assistance benefits can be rather low. Thus, British housing policy measures partly compensate for a low de-commodification in the social assistance and social security system. In most other countries, though, there is a general assumption that part of the social assistance benefit has to be used to pay the rent. This means that the social assistance benefit needs to be set at a higher level (Groves et al., 2007, p. 7). In the above example, the housing policy acts as a substitute for the deficits (whether deliberately caused by the government or not) in other areas of the welfare state, thus softening the effects of

caused by the government or not) in other areas of the welfare state, thus softening the effects of policies in these areas. However, it may also work the other way around. The de-commodifying power of the social assistance and social security system may be such that a country can suffice with relatively limited expenditure on de-commodifying housing policies. Possibly, such processes would

explain why the Norwegian housing policy regime developed in a liberal direction between 1980 and 2005, whereas the Norwegian welfare state regime as a whole largely retained its social-democratic features.

5.2 Esping-Andersen and Kemeny's typology as a framework for explaining housing outcomes In four different articles (Hoekstra, 2005a, Hoekstra, 2005b, Elsinga and Hoekstra, 2005, Hoekstra, 2009), I tested to what extent the divergence theories and typologies of Esping-Andersen and/or Kemeny offer a good explanation for the differences between countries with regard to measurable housing outcomes such as tenure, dwelling type, housing quality, rent levels, income distribution of tenants and housing satisfaction. The main results of these articles are presented in table 5. Based on this table, the following conclusions may be drawn with regard to the relevance of both frameworks.

Table 5 Housing outcomes according to the typologies of Kemeny and Esping-Andersen

Welfare state	Social-democratic	(Conservative)	Liberal	Mediterranean
regime (Esping-		Corporatist		
Andersen)				
Ideology, political	Collectivist ideology,	Collectivist ideology, corporatist political		Not included in
structure and type	structure and unitary rental system		non-corporatist	Kemeny's theory
of rental system			political structure	and typology
(Kemeny)			and dualist rental	
			system	
Share of	Mixed	Mixed	High	High
homeownership				
sector				
Quality and	Low	Low	Low	High
appreciation of				
apartments				
compared to				
single-family				
dwellings				
Housing outcomes	Typical of a unitary	Typical of a unitary	Typical for a dualist	Not included in the
with regard to the	rental system	rental system	rental system	analysis
rental market				
Housing	High	Mixed	High	High
satisfaction of				
homeowners				
compared to				
tenants				

Source: Hoekstra, 2010

The utility of Esping-Andersen's typology for explaining and predicting housing outcomes depends on which housing aspect and welfare regime type one is looking at. For almost all housing aspects, the differences between the social-democratic and the corporatist welfare state regime turned out to be limited.

As for the housing outcomes with regard to the rental market and, to a somewhat lesser extent, the share of the homeownership sector, the liberal welfare state regime showed different housing outcomes than the social-democratic and the conservatist-corporatist regimes. The housing outcomes in the Mediterranean welfare state regime are similar to those in the liberal welfare state regime, except for one aspect. The quality and appreciation of apartments compared to single-family dwellings is much higher in Mediterranean countries than in liberal countries.

Given the small differences in housing outcomes that were found between the social-democratic and the conservative-corporatist welfare state regimes, Kemeny's rental system typology might offer a good alternative for the Esping-Andersen framework. After all, in this typology both the social-democratic and the corporatist welfare state regimes are seen as unitary rental systems with a collectivist ideology and corporatist power structures, as opposed to the privatist and non-corporatist dualist rental systems in the liberal welfare state regime.

Table 5 shows that the unitary versus dualist rental system dichotomy serves well as a predictor of outcomes on the rental market. Its utility is somewhat less pronounced when it comes to predicting differences in the tenure distribution. Finally, no empirical support was found for Kemeny's hypothesis that the characteristics and the appreciation of single-family dwellings compared to apartments differ between the different types of rental system. In both types of rental system, single-family dwellings were of higher quality and were more appreciated than apartments. However, I also observed that the quality and appreciation of apartments clearly differs between the Mediterranean welfare state regime and the other three, which suggests that the type of welfare state regime does matter after all. Certainly, any causal relationship between the welfare state regime and the characteristics and the appreciation of the different dwelling types runs through intermediary variables such as the degree of urbanization, the function and use of public spaces, the role of private and public transport, and the importance of having friends and relatives in the immediate vicinity. Therefore, further research on such intermediary factors is needed to shed more light on this issue.

5.3 Conclusion

The main objective of my PhD-thesis was to test to what extent the theories and typologies of Esping-Andersen and Kemeny offer a good framework for explaining international differences in housing policies, housing outcomes, and housing market developments. The answer to this question is nuanced. It very much depends on the country and the particular housing aspects one is looking at. Nevertheless, my overall conclusion is that both Esping-Andersen's and Kemeny's typology provide a good starting point for international comparative housing studies, also because there are no suitable alternatives available. At the same time, I would like to stress that the typologies should not be applied in a rigid and dogmatic manner. If possible, they should be adapted and/or fine-tuned according to the specific issue under study, just as I have done with the concept of corporatism (see Section 5.1). In my opinion, constructing typologies is not an end in itself. Rather, these are theoryinspired devices that can be used to structure and facilitate international comparative analyses. When thus used, typologies can have considerable value.

6. Housing and the welfare state: recent developments and a research agenda

In this Section, I will first describe four recent developments that have had an influence on both the welfare system and the housing system. Partly based on these new developments, I will finish the paper by formulating some research questions that I see as very relevant for the future.

6.1 Recent trends within the welfare and housing system

The 'financialization' of housing and the welfare state

After 2000, housing was increasingly considered as the basis for so-called asset-based welfare. This concept has been developed by Sherraden (1991) who states that assets enable people to make a long term financial plan and to set and achieve life goals. According to Sherraden, asset-based welfare policies would reduce poverty and foster participation and active citizenship (Toussaint, 2011). Housing is important element of such policies since for most homeowners, their house is the most valuable asset they possess.

Housing asset-based welfare has recently gained considerable currency in the United Kingdom, and it is also an important feature of the East Asian welfare and housing systems (Groves et al. , 2007, Ronald, 2008, Ronald and Elsinga, 2011). The pivotal notion in housing asset-based welfare is that homeowners can employ the assets accumulated in their dwelling (equity) as a safety net. They can use these assets as a supplement to (or even a substitute for) other welfare state provisions. Consequently, governments may perceive these housing assets as a justification to cut back spending in key areas of the welfare state, specifically social security and social assistance, pensions, healthcare, and education. Housing may thus act as a lever for welfare state restructuring, which is why Malpass (2008, p.1) depicts it as an important cornerstone of the new welfare state. In line with the 'financialization' of international comparative housing research, alternative typologies of housing systems, based on financial factors rather than on state interventions, were also developed in recent years. The typology of Schwartz and Seabrooke (2008), which classifies developed nations on the basis of their level of owner-occupation and the size of mortgage lending as percentage of the GDP, is a case in point.

Welfare state restructuring

As a result of demographic change (ageing population) and financial problems (Global Financial Crisis), most developed welfare states have undergone a profound restructuration in recent years (Dingeldey and Rothgang, 2009), usually resulting in a significant reduction (both in quantity and quality) of the welfare services that are provided. This has important societal and social effects. In relation to this, Standing (2011) describes the rise of the Precariat: the rapidly growing number of people that lives in insecurity and without much perspective as a result of the increasing flexibilization of the labor market and the lack of good social assistance schemes.

The restructuring of welfare states also results in the taking over of their tasks by families (Blome et al., 2009), NGO's and social enterprises (Kendall, 2009). All over the worlds, welfare states are searching for new, more effective and more efficient arrangements between state, market, family and third-sector parties.

An increasing influence for the European Union

All over Europe, providers of social housing tend to receive support from the government. This state aid can take various forms, such as direct subsidies or grants, favourable loans, guarantees or the provision of cheap building land. In the last decade, real estate developers and private rental landlords from various countries have filed complaints about the way social rental landlords are supported and regulated, accusing the national governments of the countries concerned of violating the EU regulations concerning fair competition.

The case of the Netherlands makes clear that European Union regulations can seriously influence the configuration of national housing systems. In an agreement between the European Union and the Dutch government, it was decided that the state aid that the Dutch government provides to housing associations (this does not concern direct subsidies but mainly guarantees and the provision of cheap building land, see Priemus and Gruis, 2011 for more information), is only allowed for the provision of so-called Services of General Economic Interest (SGEI). These are services that are provided outside the public sector, but under conditions that are defined by the government, in order to protect the 'general interest'. These government-defined conditions may diminish the profitability of the undertaking. State support is then allowed to compensate for this loss.

However, the state aid that is provided to SGEI's is bound to strict conditions. First of all, the activities that are carried out with the help of state support need to have a clear target group of disadvantaged households. Second, the state-supported activities should be clearly separated from potential commercial activities that are carried out by the same organization. Third, the state aid should be proportional, e.g. it should only cover the extra costs that are made for the sake of the 'general interest'.

Within Dutch social rental housing, only the provision of affordable rental housing and particular types of public-purpose buildings is seen as a SGEI-activity, and thus eligible for state aid. In relation to the provision of affordable rental housing it was decided that, from 2011 and onwards, at least 90% of all vacant affordable social rental dwellings (rent level below Euro 681) should be allocated to the so-called 'target group of housing associations' (households with a taxable income below € 34.229). Before 2011, only 75% of all vacant social rental dwellings was allocated to this target group. The consequences of these new regulations are expected to be substantial. The Dutch social rental sector will become smaller and more residualized (e.g. stronger concentration of lower income groups). Furthermore, housing associations will lose part of their autonomy, and they will be forced to focus more on their core tasks (letting and managing rental dwellings).

The Netherlands is not only the European country in which the national housing system has proven to be at odds with the EU-regulations. In Sweden, EU-regulations have also resulted in a transformation of the social housing model. In this country, all state aid to municipal housing companies has been abolished (European Parliament, 2013), which means social housing is not a SGEI anymore.

In France and Belgium, there are discussions about the subsidization and regulation of social rental landlords as well, also as a result of complaints of private real estate developers. At the moment of writing, the European Union has not yet reacted to these complaints (European Parliament, 2013).

Multi-level welfare states

A recent branch of policy research in Europe focuses on multi-level welfare states. The main argument is that while the responsibility of some policy fields has shifted to the European level and other policy fields remain under strong influence of national states, some regional and local

governments attempt to implement additional social policies that are neither covered by the EU nor by national governments. Doing so, they strengthen their positions and justify their existence. The available research hypothesizes that such regional and/or local social policies are more developed in relatively affluent localities and in localities with a strong own identity (Beyers and Bursens, 2010).

6.2 Questions for future research:

Section 4 of this paper has shown that there clearly is divergence between European welfare and housing systems, although this divergence does not necessarily follow the patterns that are predicted by Kemeny and Esping-Andersen. An interesting question is how the differences between countries will develop in the future. Will the divergence continue to exist or will there ultimately be convergence, as predicted by adherents of the convergence approach? This question is difficult to answer since the effects of the trends that are described in Section 6.1 are highly unclear. Depending on the specific circumstances, one and the same trend may lead to either convergence or divergence, as will be explained below.

The future of asset-based welfare

The trend towards asset-based welfare is most clearly visible in countries with a large home ownership sector and a tradition of home ownership, such as the liberal and the Mediterranean welfare state regime. In theory, these characteristics would enable these countries to substitute a substantial part of the government provided welfare by asset-based welfare, a process which is already under way. However, asset-based welfare only works well in a flourishing housing market with sufficient transactions and stable or increasing house prices. It is particularly in the liberal and Mediterranean countries, which have been hit hard by the economic and real estate crisis, where such a flourishing real estate market is absent at the moment.

The effects of welfare state restructuring on the housing system

The effects of welfare state restructuring are difficult to assess as well. Almost everywhere in Europe, the rise of the precariat, the rising unemployment, cuts in welfare benefits, and more tight mortgage conditions have resulted in an increasing demand for social housing, both from lower and middle-income groups. However, it is up to the national governments to decide how to react to this. Do they restructure the housing system in the same way as they restructure the other domains of the welfare state, thus reducing investment in social housing, or do they use the housing system to smoothen the effects of welfare state restructuring? (see also the last paragraph of Section 5.2). In order to be able to answer this question, it I think it is important to analyze housing policies as an integral part of the welfare system rather than as a separate field. This means that future international comparative analyses should focus more on the interaction between housing policies, other welfare policies, tax systems (and possibly also policies such as regional policy and spatial planning), housing outcomes, and other welfare outcomes. Ideally, the development of this entire system should be studied over time so that one could assess how welfare policies and housing policies develop in relation to each other. Such an analysis should preferably be carried out by a team that consist of housing researchers and specialists in other areas of the welfare state.

Are European regulations killing extensive housing systems?

The case of the Netherlands (see Section 6.1) has shown that European regulations concerning state aid and fair competition may oblige countries with an extensive social rental sector to limit the size of

this sector. In this sense, these regulations are expected to result in increasing convergence. However, it is doubtful whether this will continue in the future since there currently is a lot of discussion about the position of social housing within EU regulations. In this respect, various commentators and politicians plea for a single definition of social housing at the EU level. In order to be shared by all member states, this definition should be much broader than the one currently adopted in the legislation on competition (European Parliament, 2013).

New arrangements between state, market, households and third-sector parties

The new arrangements between state, market, households and third-sector parties that result from welfare state restructuring give rise to a number of new research questions, particularly with regard to the role of the third sector parties:

- Can a mix of housing policy instruments be designed that is effective and efficient in times of financial austerity?
- What can be the role of state, market parties, third sector organisations and residents within this mix?
- How can we integrate social enterprises and other third sector organizations within a market economy?

Comparing countries, regions or cities

As a result of the trend towards multi-level welfare states, cities and or regions may increasingly replace countries as unit of analysis in comparative research. Furthermore, multi-level welfare states may result in increasing regional disparities within countries. After all, the most extensive and developed policies will probably be found in the most affluent regions, and these regions are usually not the ones with most problems.

In my opinion, it will be an interesting challenge for future research to try to make sense of all the issues outlined above. There is a lot of interesting work lying ahead!

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