

Housing and Welfare Regimes

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THE CONCEPT OF WELFARE REGIMES

In his seminal publication of 1990, Gøsta Esping-Andersen introduced the term 'welfare-state regimes', to classify 'qualitatively different arrangements between state, market, and the family' (1990: 26). Before, comparative public policy research tended to rely on one-dimensional rankings of social policy, e.g. the share of social expenditure, measured against the state budget or gross domestic product (Wilensky & Lebaux, 1958; Wilensky, 1987). Measured over time, the upward trend of such scores lends itself to interpretations of a general convergence of social policies, depending on socioeconomic development.

A housing variant of the convergence thesis can be found in the book by Heidenheimer et al. (1983), where Carolyn Teich Adams suggested a universal trend towards the privatisation of housing, at least in Western Europe and North America. With further growth, private construction, private finance, and private ownership of housing would become the norm.

By contrast, Esping-Andersen's typology was multi-dimensional. For a limited set of

social policies – health insurance, unemployment insurance, and pension system – and a limited set of 18 OECD (Organisation for Economic Cooperation and Development) countries, he measured the decommodification of services, and their effect upon stratification. Three types of welfare state regimes emerged from his analyses: the liberal welfare state, the conservative–corporatist welfare state, and the social-democratic welfare state. These were '*The Three Worlds of Welfare Capitalism*' alluded to in the book title. In this respect, he follows another founding father of comparative public policy, Richard Titmuss, who discriminated between a residual welfare model, an industrial achievement model, and an institutional-redistributive model, all carrying on along their divergent paths (1974: 30f). In their characteristics, these models bear resemblance to the liberal, the conservative, and the social-democratic welfare state, respectively (cf. Abrahamson, 1999: 396).

In the liberal welfare state, social policy focuses on those in current need. Entitlement to (typically modest) subsidies is controlled on a regular basis, and is lifted as soon income limits are exceeded. Market supply of welfare services is regarded as the norm

that should be upheld as long as possible. The outcomes of such policies can be called residualist – due to their focus on strictly circumscribed groups.

The social-democratic welfare state pursues quite opposite goals. Much of its social policies address the population as a whole, without many restrictions. Such a kind of welfare provision does not follow market principles – what we are observing is the universal delivery of decommodified goods and services. As a corollary, taxes and budget costs are highest in the social-democratic welfare state, but welfare services are typically of good to very good quality.

The conservative–corporatist welfare state is neither residualist nor universalist, but it supplies most of the population with graded welfare goods, graded along class, status, and gender. It is strong in reproducing income and wealth differentials. In many fields of policy, this regime relies upon welfare provided by the family, women within families in particular. This is argued with the principle of subsidiarity, a prominent feature of Catholic social thinking.

It is generally accepted that Esping-Andersen's typology brought progress into comparative social policy, by moving beyond the one-dimensional spectrum between wel-

fare provision either by state or by market institutions. There are many more players involved in the provision of welfare goods and services, intermediate organisations, formal and informal groups, nuclear and extended families. Such a variety of providers is explicitly acknowledged in the concept of '*welfare pluralism*', put forward by Adalbert Evers (1988, 1996) and illustrated by means of a welfare triangle, with the market, the state, and households as its corners (Figure 15.1).

All kinds of welfare organisations can be positioned within the triangle, with each country having its particular arrangement. In Evers' figure, designed before 1989, North-Western European countries tend to have a welfare mix close to the market; in North-Eastern (then communist) Europe, the welfare mix is provided mainly by the state; in Southern Europe, households and informal economies are strong. At about the same time, Esping-Andersen suggested a similar typology – that of three welfare-state regimes.

In empirical terms, however, families, households, and the informal economy are missing from Esping-Andersen's calculations. His 'three worlds of welfare' are based on data for state social policy alone, and the corresponding role of the formal

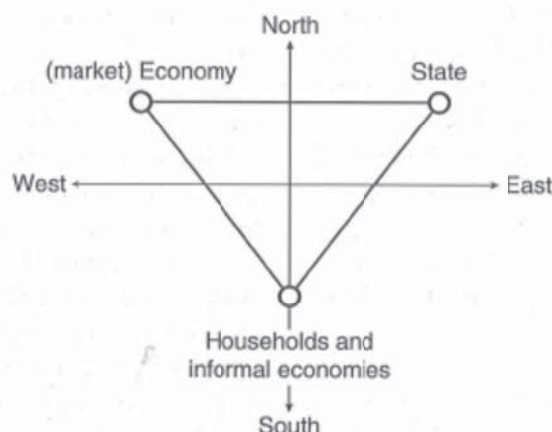


Figure 15.1 Countries' different position with respect to their welfare mix

Source: Evers, 1988.

market: decommodification scores are earned for old-age pensions, sickness benefits, and unemployment payments; stratification effects are measured by number of distinct pension schemes, by budget costs of civil servant pensions, by share of private pensions and private health, and share of universal entitlements, by the spread of social benefit payments.

Much critique has centred on the neglect of the micro level, the informal, the private, the household and family corner of the welfare triangle in Esping-Andersen's analyses. As a concept, it was there in his original publication (1990), but it took other comparative researchers to draw the connections with gender regimes (Duncan, 1995) and family regimes (Hantrais & Letablier, 1996) across Europe. Findings ranging from the social care for children or the elderly, to gender divisions in income and taxation, to family obligations have shown a great variety of both overlap with and cutting across welfare regimes. Regarding family policies, conservative welfare regimes come in two variants, following either a pronatalist model or a traditional model, while an egalitarian model coincides with social-democratic regimes and a non-interventionist model with the liberal regime (Gauthier, 1996: 205). By contrast, social care is being organised in different ways even within the same welfare state cluster, and further complicated by discrepancies between care for children and care for the elderly (Sainsbury, 1999: 246). Quite obviously, any welfare regime typology has to pay attention to the organisation of social services, as opposed to the organisation of cash benefits, on which the 'three worlds' are based (Bambra, 2005).

In his later writings, Gøsta Esping-Andersen accepted this stream of critique, stating that the

...lack of systematic attention to households is painfully evident in my own *Three Worlds of Welfare Capitalism*. It starts out by defining welfare regimes as the interaction of state, market, and family and subsequently pays hardly any notice to the latter (1999: 47 fn.1).

The change of name, from 'welfare state regimes' to 'welfare regimes', is another tribute to the change in focus, from formal institutions at the macro level to formal and informal institutions at the meso and micro levels of society. The debate about additional types of welfare regimes, such as a Mediterranean type of a familialist, 'rudimentary' welfare regime (Leibfried, 1992), is related to that critique of being blind to gender and household arrangements for welfare provision.

From the point of view of housing research, it is interesting to know that housing policy is rarely considered in the welfare regime literature. This is surprising insofar as it figures prominently in comparative Scandinavian studies, as the fourth, but '*wobbly pillar of the welfare state*' (Torgersen, 1987), besides social security, education and healthcare. Only in difficult times, such as post-war reconstruction, the housing agenda was taken over by other European welfare states. With prosperity, much of public housing fell victim to state retrenchment, and only hybrid forms of limited-profit housing survived. In comparative social policy research, housing is rarely included, but there are exceptions (Castles, 1998; Clasen, 1999; Hills, 1998). Within rental housing, groupings of distinct housing regimes have been observed. In Section 4 (*Housing Systems and Welfare Regimes*) below, their relationship with welfare regimes will be further discussed.

Conceptionally, Esping-Andersen is following the concept of power resources (cf. Kemeny, 1995b), whereas earlier typologies of the welfare state have been based on the socioeconomic concept. Four other concepts of comparative policy research are portrayed in Manfred Schmidt's textbook on the welfare state (Schmidt et al., 2007): the theory of party differences (including Hicks et al., 1995), institutionalist theories (including Obinger & Wagschal, 1998), an internationalist hypothesis (including Leibfried, 1992), and a path dependency school (including Pierson, 2001; cf. Section 2 below).

In the following sections, the original concept of 'welfare state regimes' will be expanded in several dimensions that have guided the debate ever since, and their relevance for housing research will be highlighted. Section 2 (*Path Dependency and Path Changes of Welfare Regimes*) will look at the history of welfare regimes and elaborate on the point that the classical trilogy is based on a specific period, before and until 1980, which has been changing since, and which had been the result of a long evolution of welfare policies then. Section 3 (*Three and More Welfare Regimes*) will question the original classification, also by looking at countries that had not been covered by the original study. Section 4 (*Housing Systems and Welfare Regimes*) is on typologies of comparative housing research and how they relate to welfare regimes. Section 5 (*Homeownership and Welfare*) elaborates on the specific role housing wealth is playing in welfare regimes with widespread homeownership. In Section 6 (*Rescaling Welfare and Housing*), the question about the appropriate scale of analysis will be raised, both concerning national welfare regimes, and national housing regimes, and whether comparative typologies should not rather be based on regional and urban findings. Section 7 (*Evaluation of Housing Systems*) will draw a preliminary conclusion of the welfare regime and housing debate that has informed and enriched housing research since the 1990s, by looking at some comparative studies evaluating the outcomes of different housing and welfare regimes. We summarise our findings in a brief (*Outlook*) in Section 8.

PATH DEPENDENCY AND PATH CHANGES OF WELFARE REGIMES

Esping-Andersen's classification of welfare-state regimes puts a strong focus on structure and stability. Although in his later work Esping-Andersen (1996, 1999, 2002) delves into the particular strategies of how different

welfare regimes adapt to changing environments and internal shocks, his overall view is that in most countries 'what we see is not radical change, but rather a "frozen" welfare state landscape (1996: 24).' This picture of intrinsically different characters of welfare states arising from one important and irreversible turning point in history can be seen as an example of strong path dependency. Other categorisations such as the Bismarck-Beveridge divide also come under this concept: that crucial past decisions decisively curtail the options for future development.

The Bismarck-Beveridge distinction is particularly widespread in French academia. According to Bonoli (1997: 357), old Bismarckian social policies are based on social insurance and provide earnings-related benefits for employees; entitlement is conditional upon a satisfactory contribution record and financing is mainly based on employer/employee contributions. The new Beveridgean model, on the other hand, is characterised by universal provision, where entitlement is based on residence and/or need, benefits are typically flat rate and are financed through general taxation. While the main aim of the Bismarckian model is income maintenance for employees, Beveridgean social policy mainly addresses the prevention of poverty.

Historically, Bismarckian social policy developed in the 1880s and was tightly oriented towards the position of workers in the market economy. By granting basic work-related insurance, Bismarck aimed for the allegiance of workers to secure political stability. The Beveridgean concept of social security is named after the report of William Beveridge initiating the post World War II social security reforms in Great Britain. These reforms included the expansion of national insurance and the creation of the universal National Health Service. Social policy measures were aimed at the prevention of poverty and addressed the whole population, not just parts of it. Beveridgean welfare states differentiated into more

universal Scandinavian welfare states and more means-tested residual welfare states, mainly in Anglo-Saxon countries.

The Bismack–Beveridge distinction thus blurs the difference between universal and means-tested social services that, however, is of great importance in analysing the elements of housing policy, such as the social rented sector and the rise of housing allowances. Maybe for this reason it has not been taken up in housing research so far. Beveridge himself preferred contribution financing and had an aversion to means-testing (Bonoli, 1997: 357).

Jens Borchert (1998) criticised the excessive path dependency of Esping-Andersen's approach. According to Borchert, Esping-Andersen's classification of welfare regimes arises from too strong a focus on the 'Golden Age' of welfare in the 1970s and 1980s. When adding dynamics to Esping-Andersen's rather static regimes, and when considering a much longer time period from the end of the 19th century to the 1990s, several stages of welfare-state development and regime changes can be distinguished. These phases are connected by 'critical junctures' at which path changes were frequent in some countries. During the second phase of welfare-state development in the 1960s there was a much larger variety of welfare states than in the early beginnings and also after the crisis of the 1970s.

Hicks et al. (1995) examined the consolidation of income-security programmes during the formation of the welfare state around 1880 to 1920. Besides the Bismarckian development path, they describe a second path, the Lib–Lab route, which centres on the strategic incorporation of Labour parties and/or unions into governing Liberal coalitions. They suggest common Lib–Lab roots for some 'social democratic' and some 'liberal' welfare states. Some of these states were recipient for universalist, Beveridge-type reforms after World War II. All in all, however, the findings of Hicks et al. support Esping-Andersen's fundamental socio-political explanation for the

development of differing welfare regimes: the concept of working-class mobilisation and class coalitions. They find that all paths to welfare-state consolidations are 'manifestations of working-class pressures for social amelioration even prior to extensive entry of social democratic parties into government during the 1930s' (Hicks et al., 1995: 344).

In a European context, there is an extensive literature on the process of transformation to the welfare-state models in response to fundamental economic, demographic, social and technological changes (e.g. Kuhnle, 2000; Ferrara & Rhodes, 2000; Esping-Andersen, 2002; Taylor-Gooby, 2006; Pierson, 2007; Seeleib-Kaiser, 2008). The lack of housing as an element of the welfare state is particularly striking for these investigations.

Following the economic crisis of the mid 1970s, which fostered the end of the 'Golden Era' of the welfare state, a large part of the literature is dominated by a crisis discourse. The retrenchment of the welfare state is one version of a convergence explanation that sees the European welfare state on the defence and in need of a radical reorientation. The reduction of social spending is seen as necessary, for one part, as it is supposed to be an impediment to economic growth, and for another part, as high taxes needed for social spending are (per se) deemed as a disadvantage in a competitive global economy. Others are alarmed about the ageing of the population and the stress this poses on the future financing opportunities for social measures (Pierson, 2007). There is a strong nexus between an increasingly globalised economy and the Europeanisation that is argued to curtail the political competency and ability to act of the national welfare states. Therefore, the question of a 'qualitative dysfunctionality' (Schubert et al., eds 2009: 7) of the welfare state arises.

Addressing a possible convergence of welfare regimes, most authors therefore identify changes towards the liberal regime.

THREE AND MORE WELFARE REGIMES

A major strand of criticism of Esping-Andersen's welfare regime classification concerns the range of different welfare regimes (Leibfried, 1992; Castles & Mitchell, 1993; Castles & Ferrera, 1996; Ferrera, 1996; Bonoli, 1997; Trifiletti, 1999).

The most fruitful variant of this criticism has been the proposition of a fourth group of countries with a specific welfare state design emerging in southern Europe (Portugal, Spain, Italy and Greece). Esping-Andersen had either not considered these countries or seems to include them in the conservative-corporatist welfare regime. Out of a discussion with Bernd Schulte, Stephan Leibfried developed and coined their classification as 'rudimentary' welfare states (Leibfried, 1992: 253), situating them geographically in the 'Latin Rim' of Europe. According to this classification, southern European welfare states are lagging behind other European welfare states because not all classical social policy areas are covered by state services. These 'rudimentary' welfare states, according to Leibfried, are characterised by a lack of a right to welfare and the lack a full employment tradition, being influenced by older traditions of welfare (connected to the Catholic Church). Other commentators have also added the southern European welfare states to Esping-Andersen's trilogy, focussing, however, on other criteria than Leibfried (Ferrera, 1996; Bonoli, 1997; Trifiletti, 1999; for an overview, see Abrahamson, 1999; Arts & Gelissen, 2002; Bamba, 2005). For example, Trifiletti (1999) classifies welfare states according to Esping-Andersen's concept of decommodification, extended by an index of gender discrimination, of the way the state considers women as wives and mothers, or as workers. The peculiarity of southern Europe is the fact that the state does not support the families' normal functioning, as usually happens in etatist conservative countries, and likewise forms problematic expectations on the role of

women. Trifiletti (1999: 56) also mentions the fact that owner-occupied housing is widespread in the southern European welfare regimes, in order to cope with risks in old age (cf. Section 5).

This nexus of the southern European welfare regime with housing is of particular interest for the present overview. Already in 1996, Castles and Ferrera posed the question 'Is southern Europe different?' when they analysed the tenure structure throughout Europe and tried to explain the extreme owner-occupation rates in southern Europe by stressing the overriding importance housing plays there in overall social policy. This concept was later on taken up by many scholars (Castles, 1998; Allen et al., 2004; Kemeny, 2005). Hoekstra (2005) confirms that only the southern European welfare-state cluster proves special when testing empirically the difference in dwelling type and tenure structure in the four different welfare regimes.

In 'Welfare Regimes, Welfare Systems and Housing in Southern Europe' Judith Allen (2006) also poses the question of how far housing provision systems in southern Europe are different from those in northern Europe. She thinks that the analysis of northern European housing systems dominates housing theory to such an extent that the particularities of the four southern European welfare states (Portugal, Spain, Italy and Greece) are lost within the discussion. While resembling conservative welfare regimes on the grounds of Esping-Andersen's main theoretical focus – namely, income maintenance programmes – southern European welfare states show specific traits in the field of housing. The first out of four such particularities is the dominance of the support for owner-occupation, which, according to Allen (2006: 252), is due to the fact that:

... political decision making was dominated by the need to prevent the growth of what was perceived, in the cold War, as 'communism'. There was no need, even if governmental resources had been available, to develop extensive social rented sectors outside of a few areas where some Fordist industry was located.

This helps to explain why southern European countries combine high levels of owner-occupation with very low levels of social rented housing. As a second attribute of southern European housing, Allen mentions the very high levels of secondary housing, especially purpose-built second homes and tourist developments, a high percentage of which are vacant throughout most of the year. Third, the extended family plays a crucial role in housing provision, such as in all other areas of social protection. Mobilising the assets of both families of origin is crucial for securing housing for young couples entering the housing market. These assets might take the form of financial help such as the down payment on a mortgage or of assistance in self-promotion and self-provision. Excepting Spain, the large diffusion of self-promotion is the fourth important trait in southern Europe housing. Allen concludes, that:

... within a non-Weberian welfare state which relies heavily on income maintenance schemes within the formal sector, and within economies characterised by large informal sectors and segmented labour forces, the southern extended family is the most significant institution mediating access to housing for its member households (Allen, 2006: 272).

Allen also identifies some problems of using welfare regime theory for analysing housing provision, especially in southern Europe. First, the welfare regimes are a synthetic concept combining empirical analysis and theorizing in order to establish three ideal-typical welfare states, none of which is realised in the real world. Also, southern European welfare states were not included in the primary investigations. Second, welfare regime analysis is designed to explore the relationship between state and market in income maintenance programmes and was never meant to be applied to a different field (housing), in a different region (southern Europe), drawing on a different element in the provision of social services (family). The most important factor constricting the application of welfare regime theory is its

deep rooting in a modernist narrative which '...assumes a Weberian-rational civil administration, a more or less Fordist labour market [...] and the attenuation of extended affective kinship ties beyond the immediate household' (Allen, 2006, 274).

There is also an ongoing debate about the liberal welfare regime and the countries subsumed in it. Within the liberal group outlined by Esping-Andersen, Castles and Mitchell (1990, 1993) identify a 'radical' welfare regime to include Australia, New Zealand and the UK. Liberal welfare regimes have an institutionalised pattern of dualism in power relations that shapes means-tested welfare provision for a minority while providing strong support for private market solutions for the majority. The three countries identified to pertain to the 'radical' variant, on the other hand, show a strong influence of organised labour which has resulted in policies that rely more strongly on state intervention, progressive taxation, and wage regulation. The application of means-tested measures, with relatively generous replacement ratios, lead to the denomination as 'radical' welfare states, 'in terms of the equalizing potential of a given policy instrument' (Castles & Mitchell, 1993: 105). These 'radical' welfare states seem to achieve a certain level of redistribution and equality by means other than social expenditure, i.e. pre-tax, pre-transfer income and income-related benefits.

Behind the Iron Curtain, Central and Eastern Europe (CEE) welfare states were still absent from Esping-Andersen's original analysis. Nowadays, these post-socialist welfare states all belong to the Bismarckian low-spending type, but there are those who claim a unique welfare model in the CEE (Brusis, 1999; Aidukaite, 2004; Sykes, 2005). In fact, these welfare states show a similar past and face similar challenges that are often addressed by the provision of similar institutional arrangements. The new EU member states show a list of key attributes such as (1) the return to the Bismarckian social insurance system established before World War II in the early transition period as a primary

common element of the welfare state in the market economy and (2) the defence of the socialist welfare state as far as full access to old age pension, disability payments, and health protection are concerned (Zukowski, 2008: 29). There are also some similarities to be identified in housing and housing policy in the region (see Section 4). Nevertheless, there are strong differences in welfare-state provision within the group of CEE welfare states, and, on the other hand, there are strong similarities with the southern European type. Therefore, the existence of a specific CEE welfare regime remains unclear.

The most comprehensive and up-to-date empirical comparison of European welfare provision (Schubert et al., 2009) will come as a major challenge to welfare regimes theorists. Comparing all 27 EU member states concerning the provision of welfare state services and analysing factors such as the spending priorities, the funding, the actors, and the 'leitmotifs' of social policy in the member states, this study negates the existence of a European welfare model and, more than that, concludes that 'it is neither possible to ratify any of the existing groupings we know from the relevant literature nor to identify clear-cut new clusters' (Bazant & Schubert, 2009: 533). Arguably, the factors used for the classification of welfare models differ considerably from Esping-Andersen's approach, yet the very controversial findings of the *Handbook of European Welfare Systems* will add oil to the flames of the 'welfare modelling business' in Europe.

In 1999, Abrahamson (p. 395) predicted that 'with the ongoing discourse on globalisation, the welfare typologizing business is bound, as a tendency, to be applied worldwide [...].' As a matter of fact, by 2009 the interest in welfare-state classifications had spread worldwide, especially to Latin America and East Asia. In Gough et al. (2004), for example, a group of social scientists are testing the applicability of the welfare regime approach on welfare provision in low- and middle-income countries in Latin America and East Asia.

Here, Esping-Andersen's focus on the state-market nexus of welfare in OECD countries leads to a lack of emphasis of other forms of welfare provision by family, kinship, and community.

The interest in the application of welfare regime analysis is particularly widespread in East Asia, or as Linda Low puts it: 'With literature on the Western construction and regime of welfare states produced *ad nauseam*, the new-kid-on-the-block is Confucian welfare.' (Low, 2006: 393). Confucian cultural heritage that underpins welfare states in East Asia stresses the importance of family and community-based mutual support. Respect for authority, self-help, education, and diligence are key themes that have promoted a high level of welfare without 'the state' (Walker & Wong, 2006).

Lee and Ku (2007) apply an empirical analysis on the question of whether there might be a further type of welfare regime in East Asia. They develop a set of 15 indicators on welfare-state systems and analyse 20 countries by applying a cluster analysis. They find that Taiwan and South Korea might be considered representatives of a new model of welfare that shows similarities with Esping-Andersen's conservative regime in respect of welfare stratification, while according to the non-coverage of welfare entitlements it is similar to the liberal regime. Japan, on the other hand, does not belong to the East Asian welfare model, but rather remains a composite of various regime types. Peng (2008), on the other hand, is critical towards the idea of applying the welfare regime analytical framework to quickly changing East Asian welfare provision. She describes the profound normative and institutional changes affecting social policy in Korea and Japan, especially the ability of the extended family to provide individual personal care.

Looking at these tendencies, the export of welfare regime theory from European and OECD countries to developing welfare states throughout the world has renewed some of the criticism (amongst others) that already in

Europe was applied to Esping-Andersen's approach: the overestimation of state and market provision of welfare in contrast to other institutions (family, kinship, community) and the absence of housing in the analysis.

HOUSING SYSTEMS AND WELFARE REGIMES

When trying to group different approaches to comparative housing research, it is possible to differentiate at least three (Kemeny & Lowe, 1998) or four (Matznetter, 2006). While the so called juxtapositional approach stresses the particularities of national housing systems and is more descriptive than analytical (Donner 2000, 2006; Schubert et al. 2009), the more influential approaches are the convergence and the divergence approaches as well as, more recently, the studies focussing on micro-scale comparisons (Section 6).

Early country comparisons of housing policy and housing outcomes focused on the similarities of housing policies and outcomes at national levels and therefore supposed housing systems to grow more alike over the post-war decades. Similar to early investigations of European welfare states, these theories distinguished phases of development, especially concerning the social housing sector and implied modernisation (Donnison, 1967; Donnison & Ungerson, 1982). The convergence approaches came under different names, be it recommodification (Harloe, 1981, 1995), decollectivization (Harloe & Paris, 1984), privatisation (Adams, 1987) or transition-to-the-market (Clapham, 1995), but the message remained the same: while post-war housing needs decreased in quantitative and, later, also qualitative terms, housing subsidies are being reduced and shifted from the supply side to the demand side of the housing market. Additionally, the social rental sector is increasingly superseded by owner-occupation. European integration, the

aim to cut public spending, the (in)direct influence of EU competition legislation, and the transition of former communist states to the market fuels the impression of increasing convergence of housing policies across Europe and still determines research output to a large extent (Whitehead & Scanlon, 2007, Scanlon & Whitehead, 2008).

As in comparative welfare research, the distinction between independent 'housing systems' or housing regimes entered comparative housing research at a later stage. In 1992, Jim Kemeny published his book *Housing and Social Theory*, where he developed a strong case to apply a divergence thesis in comparative housing research. The influence of Esping-Andersen's (and maybe others') typology of welfare states also started in the 1990s.

One can distinguish three strands of approaches on the relationship between typologies of welfare regimes and housing systems:

- one approach focuses on the systematic application of Esping-Andersen's concept on a more or less specific field of housing policy (Matznetter, 2002; Hoekstra, 2003; Hulse, 2003)
- one approach is on the structure of housing production (Barlow & Duncan, 1994; Arbaci, 2007)
- and a third approach centres on housing tenures (Harloe, 1995; Kemeny, 1995a, 2005; Balchin, 1996; Castles & Ferrera, 1996; Castles, 1998; Allen, 2006).

Walter Matznetter (2002) explored the applicability of Esping-Andersen's concept to the field of housing policy in a particular country. By abstracting from Esping-Andersen's categories of decommodification and stratification, Matznetter identifies four aspects, typical for a conservative welfare state, and identifies them within Austrian housing policy in the 1990s. Austria, by unanimity amongst researchers, is firmly placed in the conservative-corporatist regime cluster and also in the field of housing shows typical traits of 'conservative' housing policy: fragmentation (between types of tenure, developer, and building cohorts and between

the nine provinces); corporatism (corporatist, party-related networks mediating interests between developers and policymakers); familiarism (mutual help amongst relatives in self-developed housing, family-friendly subsidies); and immobilism (coherence to basically post-war structures of supply-side housing subsidies and funding).

Joris Hoekstra (2003) applies Esping-Andersen's theory to housing policy in the Netherlands in the 1980s and 1990s. By abstracting deductively from Esping-Andersen's concepts, Hoekstra relates the characteristics of welfare-state regimes with particular aspects of housing systems: (1) the concept of decommodification is linked to housing subsidisation (both demand side and supply side) and price regulation; (2) the concept of stratification is connected with housing allocation; and (3) the state, market, and family mix is related to the production of newly built dwellings. In a second step, these housing aspects are differentiated among the three welfare-state regimes proposed by Esping-Andersen. The fiscal treatment of housing is not very convincingly excluded from the analysis (Hoekstra, 2003: 60). After searching for elements of the social-democratic, the corporatist, and the liberal 'housing' welfare elements in the real-life housing policy of the Netherlands, Hoekstra confirms the Netherlands' hybrid nature between social-democratic and corporatist traits in the 1980s. Taking a closer look at the 1990s, however, Hoekstra shows that housing policy in the Netherlands increasingly lost its social-democratic traits and became more 'conservative' in character.

Kath Hulse (2003) explores the relevance of the concept of liberal welfare regimes to housing provision by analysing the rental housing sectors and the housing allowance schemes in Australia, New Zealand, Canada, and the United States. Hulse concludes that the welfare regime concept has some relevance in explaining dualism in rental markets, especially in Australia and New Zealand, where social housing sectors are smaller and the separation of support between social and

private rental segments is more clear-cut than in the United States and Canada.

Barlow and Duncan (1994) abstracted from Esping-Andersen's welfare regime theory in order to apply it to the field of housing production and housing provision. Focusing on the experience in Britain, Sweden and France, they find that specific forms of land supply and housing promotion correspond with the four clusters of European welfare regimes. Liberal welfare regimes, for example, tend to have larger developers that rely more on speculative development gains than on building profits. In social-democratic welfare regimes, on the other hand, land supply is tightly regulated by the state and therefore developers have to rely more on building profits than on land speculation.

Another example for applying welfare regime typologies and housing system classification on special policy areas and outcomes is Sonia Arbaci's (2007) analysis of ethnic and social segregation across European cities. This study investigates the ways in which the diverse housing systems, embodied in three wider welfare regimes (expanded by the fourth southern European cluster), influence and reflect different principles of segregation. Arbaci finds that there is an important relationship between welfare arrangements and socio-spatial stratifications of European cities, as can be seen in three factors (Arbaci, 2007: 429):

- 1 The scale of housing production is essential in explaining the diverse degrees of ethnic and socio-spatial segregation across European cities, according to the principle of stratification embedded in the welfare regime.
- 2 The planning system directly affects segregation processes, especially by the degree of public ownership and control of the land supply.
- 3 In southern Europe low levels of spatial segregation recorded among the most vulnerable social and foreign groups are at the same time associated with high levels of social segregation.

Welfare arrangements are therefore critically important to understand the scale, design, and process of segregation. The concept

thereby helps to explain the diversity of segregation patterns and counterbalances the widespread negative association of spatial segregation with social exclusion and deprivation.

Arbaci concludes that '[t]he emphasis on welfare regimes, as an ideal-typical analytical tool, has proven instrumental in building an overarching comparative framework and showing how housing systems and land supply differently organise the socio-spatial hierarchy of the city, whilst reflecting macro-scale principles of stratification' (Arbaci, 2007: 430).

As a third strand of connecting the welfare-state regime debate with housing there is the differentiation of housing systems according to tenure. According to Malpass (2008), these approaches vary considerably according to the role housing is seen to play within the welfare-state structure. While some researchers (Harloe, 1995; Somerville, 2000) consider housing to be of less importance to the welfare state as a whole, other researchers see in it a cornerstone and stress the importance tenure arrangements play in the configuration and development of the welfare state (Castles, 1998; Kemeny, 2001).

Kemeny (Kemeny, 1995a; Kemeny et al., 2001, 2005) has developed a theoretical framework where the structure of the rental sector is the fundamental variable for analysing housing policies in welfare states. According to this theory, differences in the rental sector developed out of differences in the social and political structures between countries and the degree of privatism as opposed to collectivism. Some countries have dual rental markets, where the state successfully shields the private rental market from competition out of the social sector. The social sector is reserved for low-income households and functions purely as a residual safety net. The providers of social housing are closely controlled by the state and strict means-testing is applied. The private market, on the other hand, is characterised by high rents and insecure rental contracts. Therefore the two segments composing the

dual rental market do not compete with each other.

In contrast to countries with dual rental markets, other countries have built up unitary rental markets. A unitary rental market – characterised by the absence of regulatory barriers to competition between profit and non-profit providers – is the precondition for the social rental market to enter into competition with the commercial rental market and thereby have a rent-dampening influence on the overall rent level. In countries with unitary rental markets, the social housing segment plays a large role in overall rental housing, is financed by state or federal subsidies, is open to broad classes of the population, and is often provided by semi-private or private limited-profit providers. If non-profit renting is allowed to compete with for-profit renting in a unitary rental market, and if high-quality rental housing can be provided at a lower price, for-profit landlords will have to lower their rents in order to stay competitive: 'This is the main channel through which the non-profit sector is able to act as a dampener on the general level of rents' (Kemeny et al., 2005: 858).

Later on, Kemeny et al. (2005) have shown how a unitary rental market may develop into a truly integrated rental market over time, passing through phases where the non-profit rental sector first influences, then leads, and finally dominates the market. At a final stage, an integrated rental market may emerge out of a unitary rental market if the supply of non-profit housing is competitive, provides good market coverage, and reaches a sufficient magnitude (Kemeny et al., 2005: 861). The evolution into an integrated rental market may be measured by the role non-profit housing providers play in the rental market. In this process, solidity plays a key role. The solidity of a housing association may be measured by the share of its own equity-to-market value: the higher this proportion, the lower is dependence on debt capital on the financial markets, which may lead to lower financing costs. Through this process

of maturation, limited-profit providers will grow more and more able to set lower rents than for-profit providers because they only need to cover their costs. Solidity is supposed to increase over time, as both outstanding debt is paid back and the market value of a housing association increases.

Unitary rental markets can be found in European countries that have shown a strong commitment to social market policies, the employment of limited-profit or non-profit providers of social services, and where German cultural influence has been traditionally strong such as in Austria, Denmark, Germany, the Netherlands, Sweden, and Switzerland.

Kemeny's distinction of unitary versus dual rental market countries has shown itself to be difficult to combine with Esping-Andersen's welfare-regime thesis, the main stumbling block being that both apply different concepts of 'corporatism' to their analysis (Kemeny, 2006; Lennartz, 2010). Nevertheless, there is a strong empirical connection between social-democratic and conservative welfare states and the existence of unitary rental markets, Norway being a prominent exception. Southern European and the liberal welfare regimes, on the other hand, are characterised by dual rental markets.

Since Kemeny's theoretical distinction of different rental markets, there have been a few empirical applications of the concept, taking a look at housing policies and outcomes in European welfare states (Hoekstra, 2005; Kemeny et al., 2005; Elsinga et al., 2008; Amann & Mundt, 2009). Drawing on the European Community Household Panel, in Hoekstra (2009) there is empirical evidence that integrated rental systems and dualist rental systems do indeed exist. Yet, there are signs of increasing convergence between the two models.

Of course, Kemeny's distinction of different housing models is not the only tenure-related concept of comparative housing research. We have already mentioned the strand of research that analyses housing policy and the extent of owner-occupation

within the structure of southern European welfare states (Section 3). Of increasing interest is also the analysis of the Eastern European housing policy and the intent to explain links with social policy changes (Lux, 2003; Hegedüs & Teller, 2005; Tsenkova, 2009). According to Hegedüs and Teller (2005: 205), the main trend in CEE countries is that the 'housing system seems to move towards a housing and welfare regime in which the state plays less and less role, the safety net puts more and more burden on the families, and it provides help only to the neediest families.' They conclude that these housing policy guidelines are close to a combination of the liberal and the rudimentary welfare regimes, but that the institutional structure of the welfare regime in CEE countries is still in the process of change.

Of particular interest in this context is a book on different kinds of housing systems in Scandinavian countries that supposedly belong to the same welfare regime. This book, unfortunately still only in Swedish (Bengtsson, 2006), shows how the institutional legacy of the different Scandinavian countries had an impact on tenure structures. It applies the concept of path dependency on housing in order to describe the persistence of differences and identify possible historical turning points or 'critical junctures'.

HOMEOWNERSHIP AND WELFARE

Throughout his academic career Kemeny has reflected on the meaning of homeownership within a welfare state (Kemeny, 1980, 1981, 2001, 2005). These reflections often took the form of clear opposition to high homeownership rates, up to the point that in some passages one 'can feel Kemeny's hostility dripping off the page' (O'Neill, 2008: 168). In Kemeny's reasoning, the rise of homeownership in industrialised nations was not due to the relationship between a variety of consumer preferences and the supply of different housing tenures, but was the outcome

of systematic discrimination against other forms of tenure, in particular social rental housing. For that reason Kemeny sees the rise of homeownership as equivalent to the privatisation of one of the four great pillars of a welfare society. Back in the 1980s, Kemeny's overall argument was that

...high rates of home ownership impacted on society through various forms of privatisation, influencing urban form, public transport, lifestyles, gender roles, systems of welfare and social security as well as other dimensions of social structure. I argued that an overwhelming emphasis on home ownership created a lifestyle based on detached housing, privatised urban transport and its resulting 'one-household' (increasingly 'one-person') car ownership, a traditional gendered division of labour based on female housewifery and the full-time working male, and strong resistance to public expenditure that necessitated the high taxes needed to fund quality universal welfare provision (Kemeny, 2005: 60).

Kemeny argued that in societies with low public retirement pensions and poor public welfare provision for the elderly, households are forced to make private provision for their old age. Put shortly, in countries where policy encourages homeownership, paying for a home will act as a strong deterrent to welfare and social security funding. Kemeny confirmed this relationship between homeownership and welfare spending by conducting a very rudimentary statistical analysis of six countries (Kemeny, 1980).

Only around 20 years later was Kemeny's proposition tested with more refined methods by Castles (1998), including 18 OECD countries and covering the period of 1960–1990. Castles concluded that, except for the public health findings, Kemeny's basic proposition could be supported. Yet, the relationship between homeownership and privatisation of welfare had been weakening since 1980. Furthermore, Castles (1998: 17) suggested that the relationship between homeownership and welfare privatisation might have the opposite causality as proposed by Kemeny:

There is no a priori reason why the relationship may not be entirely the other way around, with a

weak welfare state providing an incentive to home ownership as a means of life cycle saving or a well developed state tax crowding out the possibility of saving for private home ownership.

The Kemeny and Castles versions of the causality do not have to exclude one another: rather, there might be an interesting dynamic at work between the two explanations.

At the OTB Institute in Delft there has been a recent research focus on these issues, testing the causality of welfare privatisation and owner-occupation and applying qualitative methods on the meaning of homeownership as opposed to renting in several European countries (Boelhouwer et al., 2005; Doling & Elsinga, 2006; Horwood & Neuteboom, 2006; Elsinga et al., 2007; see also Behring & Helbrecht, 2002). In Toussaint and Elsinga (2009), there is support for the consideration that homeownership plays an increasing role in households' financial planning in European countries, especially where welfare levels are low or decreasing. In the UK, homeownership functions as a financial asset to meet welfare needs, especially in old age. This can also be seen in the rise of mortgage equity release products.

Allen (2006: 271) supports Kemeny's version of the relationship between strong state support for homeownership and a trend to privatisation of welfare services when she refers to southern Europe:

High home ownership sets up a political constituency among the young which is opposed to extending the welfare state through taxation, because it would interfere with saving for home ownership, and in favour of private pensions, health care and schools because this allows a more flexible pattern of expenditure.

In the current economic and financial crisis there is increasing interest in the relationship between housing markets, financial markets, and the economy. There is abundant literature on the effects of homeownership and housing prices on consumption and household savings (for overviews, see Leung, 2004; Case & Quigley, 2008; Goodhart &

Hofmann, 2008; Muellbauer & Murphy, 2008). Less attention is still paid to the linkage between housing market dynamics and welfare, even though there can be no doubt about the effects of skyrocketing repossession and negative equity, especially in high ownership countries such as the UK, the United States, and Spain, on the distribution of incomes and the ability of welfare systems to cope with housing-related risks. Furthermore, 'increases in the average real price of housing change the distribution of welfare towards the old, who tend to be owners, and away from the young, who tend not to be owners and may not even be old enough to vote' (Muellbauer & Murphy, 2008: 27). To investigate these topics, it is necessary to apply a very broad view on the interrelation of housing markets, welfare systems, and social policy (cf. Schwartz & Seabrooke, 2009).

RESCALING WELFARE AND HOUSING

As for most of comparative policy research, the concept of welfare regimes is deeply interwoven with the nation-state. Independent of size and internal divisions, this is the basic unit of analysis, for which data are collected and compared. When housing policy and outcomes are related to welfare regimes, this is done with national data, despite better knowledge that both welfare policies and housing markets operate at subnational, regional levels.

For the conservative welfare regime, the devolution of powers and the fragmentation of entitlements are considered typical features of welfare provision. Even in these cases, average values are collected and analysed for the whole territory of the nation-state. Only in recent years has reasoning about the welfare state been embedded in supranational developments and broken down into urban and regional studies of welfare and housing.

Perhaps it is the traditional focus on cash benefits (cf. Bamba, 2005) in health insurance, unemployment insurance, and the pension system that has contributed to the long-term neglect of other, non-national, levels of welfare provision. More often than not, cash benefits are regulated on a nationwide basis, but welfare-regime studies should also pay attention to the actual provision of welfare services, and these tend to be organised on the level of cities and regions. From the viewpoint of housing research, and social housing in particular, the debate on the 'rescaling of statehood' and the critique of 'methodological nationalism' (Brenner, 2004: 38) seem to be very pertinent, but rarely debated in the welfare regime and housing literature.

In housing research, the core argument is that the withdrawal of national housing policies and the ongoing commodification of housing do contribute to greater regional variations in house prices and other housing indicators. Regional and urban housing policies are called for to react to the specific problems encountered in different markets. For the Netherlands, Manuel Aalbers (2003) has elaborated on the very different problems encountered in regional housing markets across an otherwise balanced national housing market. While a number of regional markets have followed the national shift from suction (and shortage) to pressure (and vacancies), others have remained sellers' markets in short supply. Within regional housing markets, shortages in one market sector may be compensated by sufficient supply in another (e.g. social vs private renting vs owner-occupation). Even in a densely populated country with advanced transport systems, substitution is rarely possible between regional housing markets. Despite national balance, very demanding tasks remain for regional housing policies within the Netherlands, depending on where the regional housing market stands in the suction–pressure spectrum. And Aalbers concludes that 'There is no – and will not be a – national housing market with pressure' (2003: 64).

For the UK, Ian Cole (2003) has explored the development of housing policy at the regional level in a nation that used to be known for its 'nationalised' housing policy. Again, the core argument is the growing differentiation of local and regional housing markets, which calls for a multi-level governance of housing. New Labour made some steps towards stronger regional government, but in 'housing and urban policy (the creation of regional structures and processes) has been disjointed and ad hoc' (2003: 232). More recently, Cole and Etherington (2005) have added a comparative analysis of neighbourhood renewal policy in England and Denmark, criticizing the dominance of comparative analysis at the national level.

Within housing research, Aalbers and Cole are amongst the few proponents of comparative research at various scales or multi-scalar housing research. Beyond housing studies, there has been a substantial debate about the rescaling of public policies in recent years, with surprisingly little repercussion in the welfare-regime debate, so far. In Brenner's book, on the other hand, social housing is only a topic in his lengthy treatment of the Keynesian Welfare National State (KWNS) of the late 1950s to late 1970s, and does not show up in his chapters on the contemporary Rescaled Competition State Regimes (RCSR), where the focus shifts from social to technical infrastructure. For the political economist, social housing seems to have drifted outside the realm of the post-Keynesian state, and 'welfare regimes' are not mentioned at all.

For housing research, such a view from outside is neither new nor surprising. In the Golden Age of Welfare, housing policy was regarded a pillar of the KWNS – to use Brenner's terminology. Since the 1980s, state budget figures for housing have come down considerably and political saliency has decreased accordingly in most countries. On the national scale, some observers have spoken of the collapse of housing policy, while pointing to simultaneous trends of

devolution and decentralisation (Kleinman, 1998: 249).

What the rescaling debate tells us about housing research is that the heyday of the nation-state as the organisational level for the provision of welfare and social housing is definitely over. Welfare provision has either been privatised or rearranged on lower levels, such as the urban or the regional. This scale is not new for housing policy; on the contrary, in many European countries there was a phase of experimental housing policy prior to the 'nationalisation' of housing policy after 1945, as part of the KWNS. In the inter-war period, in some places even before World War I, there was a flurry of housing projects with public involvement, often by local and regional governments who were more exposed to grass-roots demands. In many cases, not only the pioneering architecture of early modernism survives to the present day but also part of the organisation of early social housing, be it cooperatives, non-profit societies, charities, or government agencies. As with welfare regimes, path continuities can be observed in housing, both at the national and the subnational (regional/urban) levels.

So far, only downward processes of rescaling have been addressed. In welfare, as well as in housing, responsibilities and powers of the KWNS have also been shifted upwards, to the EU and other supranational institutions. These issues are discussed in the most recent and comprehensive *Handbook of European Welfare Systems*, where part of the introductory chapter is devoted to the consequences of EU enlargement, EU consolidation, and supranationalism upon (formerly purely national) welfare systems (Schubert et al., 2009).

EVALUATION OF HOUSING SYSTEMS

Many research approaches see homeownership as an ideal – Kemeny's theory does the contrary. A lot about the differentiation of

housing regimes has to do with the implicit appraisal or criticism of homeownership. Not surprisingly, there is a strand of research that tries to connect housing outcomes with the performance of different welfare regimes or housing systems.

Doling (1999) operationalises the concept of decommodification in the field of housing policy and shows that a meaningful application of de-ommodification has to go beyond the equation with state provision and, therefore, tenure structures have to be analysed in more detail before any conclusions on the ability of a housing system to protect from reductions in income can be drawn. By defining an (admittedly very crude and subjective) index of decommodification for housing provision in Britain, West Germany and Sweden, Doling found that, surprisingly, one may consider Britain's housing system to be more decommodifying than Sweden's, owing to 'the combined effect of the absence of an imputed rent tax facing the large group of outright owners, amounting to about 25 per cent of total households, and of a housing allowance system for tenants that is able to meet their rental payments in full' (Doling, 1999: 162). Doling's approach is meant as a provocative investigation into the possibilities of evaluating housing outcomes within the welfare-state debate and making use of the concepts of Esping-Andersen and Kemeny.

Considering homeownership and household housing satisfaction, there is an interesting conundrum here that still remains unsolved. While homeowners in most countries usually show a *higher* level of housing satisfaction than renters (Elsinga & Hoekstra, 2005), countries with a high rate of homeownership usually show a *lower* general level of housing satisfaction than countries with large rental segments (Czasny et al., 2008). In the first study, Elsinga and Hoekstra use ECHP (European Community Household Panel) data from 2001 to analyse household satisfaction according to tenure in six European countries, pertaining to different housing regimes (English-speaking high

ownership, continental high rental, southern European high ownership). After controlling for tenure-related differences in housing quality, household characteristics, and housing costs, the coefficients for the variable 'type of tenure' (rental, owner-occupied) remain positive and statistically significant in all countries of the sample (except for Austria). As a conclusion, the quality of housing and the subjective perception of the dwelling size explain a large part of the differences in housing satisfaction between renters and owner-occupiers, but some explanation arises from the type of tenure itself.

Czasny, on the other hand, compares EQLS 2003 and Eurobarometer 2004 household data on satisfaction with dwelling, area you live, standard of living, and other indicators, by compiling country groups according to welfare regimes and ownership shares (nine EU15 high-ownership countries, six EU15 low-ownership countries, 10 new member states with high ownership shares). The EU countries with low ownership shares correspond to the conservative and social-democratic welfare regimes and likewise only include countries (except France) that Kemeny included in the group of countries with a unitary rental market. The old EU member states with high (>60%) ownership rates include both liberal and southern European welfare regime associated countries. Czasny finds that the EU15 low-ownership countries on average perform much better in terms of household satisfaction with dwelling and living area than new member states, and fairly better than EU15 high-ownership countries. Only concerning satisfaction with family life, high- and low-ownership countries perform equally well.

These two studies show that there is rising interest in analysing housing outcomes and housing conditions, as well as satisfaction with these, in a context of different housing or welfare regimes. This strand of research is not developed very thoroughly yet, but might in the future help to add another aspect to the housing modelling business that might also function as assistance to policymakers.

OUTLOOK

For housing research, the debate around welfare regimes has been and continues to be an inspiring exchange. In any state and region, there is a specific arrangement of welfare provision, drawing on varying contributions by formal state and market institutions and on informal economies and households. These arrangements can be grouped into a number of types of welfare regimes, with particular features that have grown over time and are difficult to change.

In the post-war European welfare state, the provision of housing was part and parcel of welfare provision, and housing policy was well integrated with other social policies (and economic policy). In health provision, schooling, pension systems, and social housing similar values prevailed, and similar organisational principles were followed. In a number of countries, a large stock of decommodified housing was built up over the decades, and has remained in the hands of non-market landlords. This is the case in unitary rental markets, where the social rented sector is either informing, leading, or dominating the rental market as a whole (cf. Kemeny et al., 2005). It takes a long time to construct such a large housing stock, and it seems that only social-democratic and conservative-corporatist welfare regimes have offered the habitat for such a stock to mature; hence, the overlap between welfare regimes and housing regimes is not a direct link but an outcome of shared values and principles in the past.

These are the lessons learned from the welfare regime and housing exchange, and the debate has only started. Twenty years after the original publication, there are many more points of reference than just Esping-Andersen (1990): data have to be updated, welfare providers have to be added, and country coverage has to be dramatically expanded. There is a lively debate in comparative policy research on these issues, but still without any reference to (or better, inclusion of) housing – with a few exceptions

such as Castles' (1998) 'really big trade-off', also echoed in Behring & Helbrecht (2002). Here are important avenues for future research.

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