Critical Housing Analysis
Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

Understanding Housing Development in New European Member States - a Housing Regime Approach

József Hegedüs

Metropolitan Research Institute, Budapest, Hungary
hegedus@mri.hu

Abstract: *The paper will address the development of housing regimes in the new EU member states,introducing the analytical framework of a housing sector matrix to classifyforms of housing by tenure andintegration mechanism. Thus, ourhousing sector matrixcombines two common approaches: thestructure of housing provision (Ball and Harloe 1992) and the tenure-focused approach (Kemeny 1981, 1995). Starting from this rough typology of housing provisions, we also take further factors that have a major impact on the behaviour of stakeholders/actors into consideration, namely the legal/regulatory environment and the subsidy/tax system, to define the housing regimes. In its analysing of the development of the new member states the paperdifferentiates between global factors (economic development model, countries' position in global economic structures, etc.) and local factors like the political/power structure, mainstream social ideology, the interplay betweendifferent stakeholders, etc. Institutional analyses (Bengtsson and Ruonavaara 2010) that take path-dependent factors into account are thus best able to address the process by which new housing regimes emerged in post-socialist countries and the degree to which we find convergence/divergence trends. The paper analyses three junctures in the development process after 1990: radical changes after the collapse of the old system; the development of the mortgage market and the regulation of the social sector at the turn of 2000; and reactions to the financial crisis of 2008. The paper concludes that the new member states are following the same trajectory despite their institutional differences.*

Keywords: comparative housing policy; East-European housing.

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

Introduction: the embeddedness of housing systems

Comparative studies have shown that housing systems can only be analysed in the context of the larger economic, political, and welfare systems (Stephens 2011; Kemp and Kofner 2010). It can be a challenge to differentiate the effects of these systems (Hall and Soskice 2001), as inequalities and risks result from the economic systemand are in turn modified by the country's welfare regime (Esping-Andersen 1980). Welfare interventions in income distribution, even those which are not housing-specific, have a large effect on the housing system, particularly with regards to affordability. The specific institutional mechanism by which housing is embedded in the welfare system must therefore always be taken into account. The idea that it is only possible to understand a housing system in the context of the economic and welfare system is not a new requirement in the literature. Kemeny (1981: 13) refers to housing regimes as the 'social, political and economic organization of the provision, allocation, and consumption of housing' but focuses on rental housing in his comparative studies. Dewilde and De Decker (2016) point out that Kemeny's definition leaves a great deal of room for interpretation, including the large variety of subsidy systems, the interaction of the state, the market, and the family to determine access to housing, etc. Other comparative works emphasise the role of exogenous factors (Boelhouwer 1993). Understanding the embeddedness of housing systems is thus a very challenging task in comparative studies.

Three basic approaches to housing systems

We differentiate three basic approaches used in the literature to conceptualise housing systems: the housing provision approach, which focuses on the social and economic aspects of the housing sector; the tenure structure approach, which emphasises the legal framework and ownership structures of housing; and the institutionalist approach, which focuses on path dependency in the development of housing systems.

The first approach (Ball and Harloe 1992; Barlow and Duncan 1994; Harloe 1982) emphasised that the structural analysis of housing models is an analytical framework rather than a complete theory of housing and focused on the role of housing provision within a capitalist economy (particularly factors such as the land market, construction, housing finance, etc.). The most frequently cited researcher of the second approach is Kemeny (1995, 2001, 2006), who connected the ruling political ideologies and power structures to the social/political/legal arrangements of tenure. As a result, tenure structure is often considered the most important determinant of housing systems. Lundqvist (1990) is an example of the institutionalist approach, which describes the historical development of housing systems (path dependence) in the context of the interactions between various stakeholders. There are, of course, many variants of this approach depending on the factors emphasised by different scholars (Matznetter 2002; Matznetter and Mundt 2012; Malpass 2008; Fitzpatrick and Stephens 2014).

The housing sector matrix as an analytical tool combining two of the basic housing regime approaches

Our housing regime approach is based on a housing sector matrix. The rows of the matrix represent the various major integration mechanisms, while its columns represent different forms of tenure. The cells of the matrix contain various housing solutions that play different sociological and economical roles depending on the context of the housing system.

Following Polányi's approach (Polanyi 1944) we start from three types of integrative mechanisms: state, market, and reciprocity. We diverge from typical approaches in two points.

First, we use the typology to describe relationships within the housing system rather than societies as a whole, which obviously entails a restriction of the original concept. Second, we complement the typology with a fourth category, that of exclusion/marginalisation. It may sound odd, but analysing the housing regimes we cannot neglect situations in which the basic integration mechanisms do not function. Powerless households are forced out of the formal housing sector. A key point in our approach is that, in reality, various integrative mechanisms are present at the same time. It is the researcher's job to determine the dominant integration mechanism, which is not always clear-cut.

The columns of the matrix represent the typical tenure forms: state-/council-/publicly-owned rental housing, private rental housing, and owner-occupied housing. Despite their apparent simplicity and clarity, there are drawbacks to relying too much on these categories. Ruonavaara (1993) may have been the first to point out that a given form of tenure can cover a wide variety of different individual cases. Doling (1999) also emphasised that the variants of different forms of tenure have different sociological meanings. Mandic and Clapham (1996) showed that tenure is interpreted differently in post-socialist countries owing to the region's historical and cultural background. Hegedüs and Teller (2007) similarly argued that tenure is interpreted differently in different housing systems, primarily due to differences in the legal framework and subsidies/taxes.

The housing sector matrix results from the combination of the two dimensions described above. Every cell of the matrix is defined as the combination of a (dominant) integration mechanism and a tenure type and corresponds to a specific housing solution (see Table 1). The housing sector matrix can be understood as a combination of the two basic approaches to housing regimes, which situates housing solutions in the matrix.

Table 1: A framework for a comparative analysis of housing regimes, with international examples

		Forms of tenure		
		Public rental housing	Private rental housing	Owner-occupied housing
Integrative mechanism	State/social integration	'A': Council housing, rental cooperatives	'B': Social rental housing agency, significant housing subsidy models	'C': Singapore model, Land Trust, Spanish/Portuguese subsidised private ownership
	Market integration	'D': Social landlords enter the market (Netherlands, UK, Hungary)	'E': Typical private rentals, the owners are private individuals or institutional landlords	'F': Typical private ownership
	Reciprocative (family and friends)	'G': Sub-tenants move into social rental housing based on favor	'H': Favor-based rentals, special financial agreements	'I': Housing provided as a favour (e.g. between relatives)
	Exclusion, marginalisation	'J': Homeless services	'K': Illegally occupied housing	'L' Sub-standard housing, slums

When government housing policy (legal or/and financial interventions) determines the relationships of the actors and housing (distribution, costs, ownership rights, etc.), we speak of the state integrative mechanism. (Other mechanisms can play a subordinate role).The literature on housing policy often only considers Type A to be social housing (Scanlon et al. 2014). This is unfortunate, as social housing programmes often rely on the private rental sector (cell B) or owner-occupied housing (cell C). Although the role of the state is less clear in the case of the other tenure types, there are many examples of it playing a definitive role. The state can, in return for the subsidies it provides, claim the right to intervene in housing provision. The position of housing cooperatives (and analogous entities) can be very different depending on the role of the state, and they can belong to either cell A or cell C, as they can only be classified as either public housing or owner-occupied housing when the legal and financial conditions are known.The terms employed are often misleading, as revealed by the example of Sweden, where the category of social housing was abolished to comply with the EU's state aid regulations (Elsinga and Lind 2012) The private rental sector is sometimes used for social housing provision in modern housing systems. In Western Europe, social housing agencies mediate between private owners and social tenants with the help of social/state subsidies (De Decker 2002; De Decker et al. 2017), and post-socialist countries have also experimented with policies of this kind (Hegedüs et al. 2014). Owner-occupied housing under direct state control is an interesting form of housing, in which the state determines its operational costs as well as its distribution, construction, and financial conditions. This form of housing played a dominant role in the socialist housing system, but it also has a significant role in non-socialist countries. In Singapore, 86 % of the housing supply in 1996 was composed of the government-controlled private sector (Beng-Huat 1997), and Portugal and Spain had similar models (Hoekstra et al. 2010). In South American housing systems, subsidies for private housing construction targeting a low-income population are a typical form of intervention (See Salvi de Pedro 2016).

There can be many variants of market integration depending on the regulatory system. Market integration does not refer to a perfect self-regulating market; it indicates the dominant role of supply and demand. The market is often distorted by state regulation (or the lack of state regulation) and the asymmetry of information characteristic of housing markets. Market integration does not exclude significant state regulation (e.g. rent regulation, taxes, rules and regulations related to mortgages) and significant state subsidies (whether in the form of direct subsidies or tax rebates), but the operational logic is determined by supply and demand. An important instance of a market integration mechanism is when social landlords rent out part of their stock at market rates (cell D). This phenomenon of social landlords distributing their stock and setting rent according to the logic of the market was an important element of housing policy in the 1990s. The policy aimed to meet budgetary constraints and to create neighborhoods of mixed social composition. There are many examples of this policy in the Dutch housing system. In modern housing systems, public rental (cell A), private rental (cell E), and owner-occupied housing in a developed housing finance system (cell F) count as typical.

Reciprocative integration often comprises social rules and mechanisms which go beyond the state and market logic. The relationships between actors (families) are fundamentally dependent on social norms and customs, even though the logic of the market can be present to a limited degree. Transactions among family members are a typical example of the reciprocative sphere. These often follow 'soft market' principles (e.g. family members still pay rent, although they are given preferential treatment as tenants; they pay back loans with interest, etc.). However, the power relations in this form of integration are determined by agreements within a family. These housing solutions are often defined in negative terms, that is, as 'non-state, non-market' solutions. Reciprocative integration occurs less frequently in social housing (cell G), but it can play a significant role in theprivate rental sector (cell H) and the owner-occupied sector (cell I)

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

in many housing systems. The literature typically emphasises the role of the family, but the sphere is far broader. It is common for private landlords to attempt to find tenants through their network of acquaintances and let the apartments at below-market rates as a means of limiting risk (Hegedüs et al. 2014). The sharing economy, which is increasing in popularity, can also be considered an example of reciprocative integration, as it is independent of state and market actors.

Homelessness, exclusion, and marginalisation create a special 'integration' mechanism, in which integration occurs 'outside society'. This occurs when families lose their legal housing, use services for the homeless (cell F), live in socially unacceptable, sub-standard housing, or occupy housing illegally (cells K and L). Housing in urban and, particularly, rural slums are often determined by social mechanisms that cannot be grouped with any of the above categories. Slums can comprise up to 30% of the housing system in less developed countries, albeit typically no more than 1-2% in developed European housing systems. However, this type is of definitive importance both conceptually and for housing policy in practice.
The housing sector matrix provides an analytical tool to map different housing provision forms which could help the classification of the housing regimes based on the relative weight of the matrix's different 'cells'. It is a useful tool to describe the main features of a housing regime, but it is not sufficient in itself. The actors in the housing system have a great variety of motivations, aims, relationships, etc., which determine their behaviour. To understand how a given housing regime operates in practice, it is necessary to understand how this behaviour is dependent on the actors' specific legal and financial environment.

Housing policy –an institutional analysis of changes in thehousing sector matrix

The dynamics of the housing system– how it changes over time – can be analysed using the housing sector matrix. The behaviour of the system's actors and the relationshipsbetween them is determined by the given regulatory environment and system of subsidies and taxes, as well as by the factors described in the housing sector matrix. Housing policy intervenes in this system by changing the legal and regulatoryframework and the subsidy and tax regime, but it necessarily builds on existing structures, as the behaviour of the various actors is embedded in the socio-economic system of previous periods. Housing regimes change gradually,which highlights the significance of path dependency and the institutional analysis of the housing system.

The housing literature highlights three areas of regulation that define the framework of the housing system: the regulation of mortgages and housing finance; the regulation of tenants' and landlords' behavior; and the regulation of housing construction (urban development and building codes).

In the area of housing finance (mortgages, relevant subsidies, and taxes), it is important to keep in mind that 'housing goods' have a special characteristic in modern economies: they are simultaneously consumer goods and investment goods. This has a strong effect on the economic aspect of housing market processes. The dynamic element of the housing solutions that emerge in the sub-markets of the housing system is strongly influenced by the economic factors of the various forms of housing – the financial burden or income that results from

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

sustaining a given form of housing. The regulatory environment of housing finance can thus represent a serious risk. Overly regulated systems have high social costs and low efficiency (Malpezzi and Mayo 1997). However, deregulated markets often lead to socially unacceptable and economically wasteful solutions (Grout and Zalewska 2004; Akerlof and Shiller 2009, 2015). The regulatory environment reflects economic power relations ('asymmetric information'), which was apparent in the deficiencies of consumer protection in the past decade (Duebel 2014).

The legal and financial regulation of rental housing and changes to this regulatory framework play a definitive role in the institutional development of the rental sector. The regulation of the legal relationship between tenant and landlord (e.g. council, housing cooperative, etc.) and the subsidy system (including supply-side subsidies for housing construction and demand-side subsidies such as rent support) are both important elements of the various models. Changes in the regulatory environment and the subsidy system, whether for economic or political reasons, provoke changes in the behaviour of social landlords. These changes are seldom in line with policymakers' expectations, as in the example of the introduction of 'fair' rent control in Italy in the 1980s, which practically caused the private rental sector to collapse (Tosi 1990; Padovani 1996).

Building regulations and land policy influence urban housing construction and thus become a major social and efficiency factor. Land values play different roles in different integration mechanisms (Bertaud and Renaud 1997; French and Hamilton 1997). The inclusionary housing policies applied in the 1970s in the United Statesturned into widely used affordable housing interventions across Europe (Schwartz et al. 2012; Mukhija et al. 2010).

Housing policy's most important tools are its subsidies. As we mentioned, regulatory interventions typically have financial consequences (through the redistribution of costs and risks), but direct subsidies and tax allowances are transparent interventions. From an economic point of view, subsidising various elements of the housing system (rents, land, mortgages, etc.) represents a kind of decommodification, that is, housing is (partly) removed from the laws of the market, and its commodity aspect is restricted. The nature of decommodification and a description of its consequences are a fundamental question in any analysis of housing regimes. There are several techniques of subsidisation, but the long-term question is how long public resources remain in the housing sector to serve public purposes. For instance, housing cooperatives in Germany are private institutions but provide affordable housing, as stated in their founding charter, becausetheir profitsmust be reinvested in housing.

Our approach is close to Clapham's, who argues that 'the impact of policies can only be gauged through an understanding of the complex interplay between organizational policies and their implementation and the way that applicants for housing react in the light of their perception and attitude' (2002: 57). The behavior of households and institutions in the housing market is the dynamic element of the housing regime in the sub-matrix we use.Housing regimes change when households and institutions react to economic, political, and financial circumstances, shaped by prevailing norms and ideologies. Their decisions bring about change in the submarket matrixand in housing solutions, as indicated in the cells. It is therefore important to assess the key elements in institutional and individual housing-related decisionmaking.

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

The literature on comparative analyses of housing regimes emphasises two questions: how an intervention affects social inequality[1]and what influence it has on the efficiency of the economyand the housing system in particular (Dewilde 2017). The economic efficiency of regulation and subsidies varies, as resources can be wasted and dysfunctional institutions can be strengthened, but this issue cannot be discussed without taking the wider economic environment into account.

Housing regime changes in post-socialist housing systems

This new approach to housing regimes makes it possible to re-interpret the East-European Housing Model (Hegedüs and Tosics, 1996). The main characteristics of the EEHM were single-party political control over the housing sector, the subordinate role of market mechanisms, a lack of market competition among housing agencies (bureaucratic coordination), and broad control over the allocation of housing services (huge, non-transparent subsidies). We can use the housing sector matrix to illustrate the basic structure of the model (Figure 1.) One of the clear advantages of this approach is that the relatively low share of the public rental sector before 1990 (e.g. in Bulgaria, Hungary, and Yugoslavia) is consistent with the dominance of state control, especially in urban areas. Market processes in the public sector were a well-known 'crack' in the system (Alexeev 1988, 1990; Hegedüs and Puzanov 2017). Moreover, self-help or self-build was a typical form of housing provision in rural areas, which was dominated by reciprocaltransfersamong members of the family and their local (neighbourhood/workplace) network (more recent literature refers to this as familialism;e.g. Saraceno 2016).

The EEHM describes the main principles and features of the housing system under the socialist political and economic structure.But the housing systems in the region were not identical, partly because each country had different institutional, legal, and political traditions, which influenced housing policy.Moreover, the development of the socialist political and economic system followed a special path that has also affected housing policy. The rapid process of industrialisation and urbanisation confronted the socialist housing system with insurmountable difficulties. This resulted in 'cracks' (Hegedüs 1992) in the housing model. Countries responded differently to the appearance of these 'cracks': they could either implement strict control mechanisms (Bulgaria, Russia, East Germany) or allow quasi-market processes (Yugoslavia, Hungary), which can be interpreted as varieties of the EEHM.

[1]It is possible to describe the effect of the integration mechanism on how social inequality is transferred to the housing system. However, in the context of legal and economic interventions, the behaviour of the actors can distort the consequences expected based on the 'ideal types' (e.g. that the state integrative mechanism decreases inequalities, the market transfers income inequality to housing, reciprocity has no direct consequence on inequality, marginalisation increases inequalities.) Subsidies are often regressive (they reach higher-income households to a greater extent). Moreover, the behaviour of institutions and individuals can have unintended consequences.

Critical Housing Analysis
Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

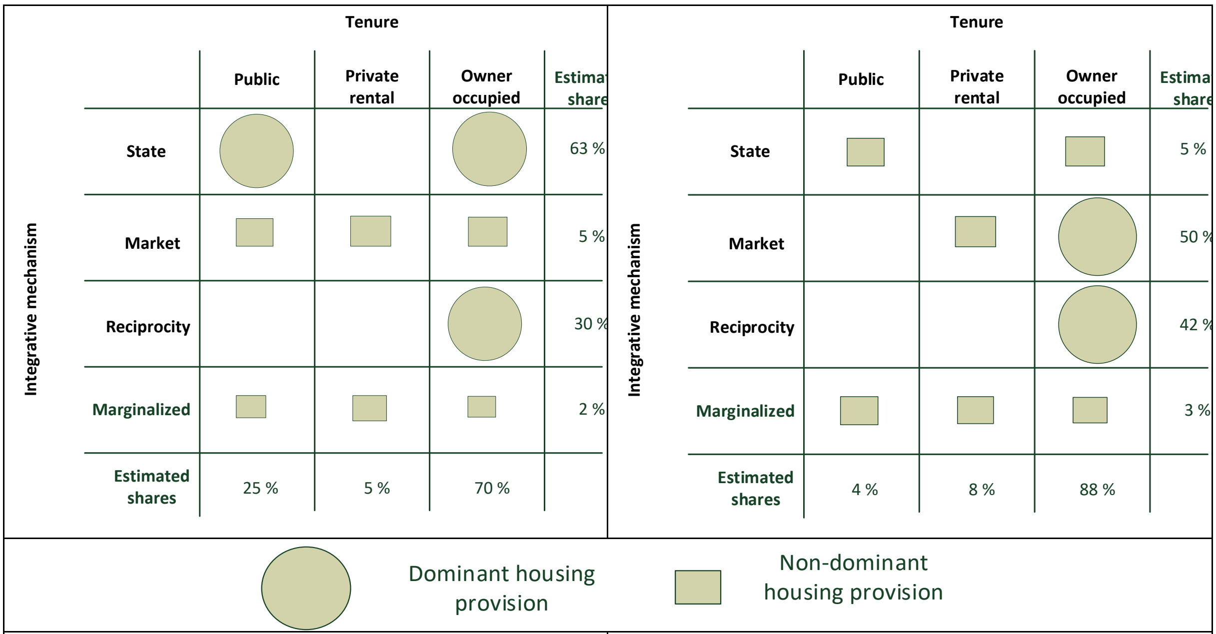

Figure 1.A stylised illustration of the socialist housing system (with estimated share of the categories)

Figure 2.A stylised illustration of the post-socialist housing system (with estimated share of the categories)

The relevant research question is how the EEHM developed after the transition and what drove these changes. The earlier studies influenced by the World Bank's'enabling' approach (World Bank 1993) were looking for signs of a transition to a system dominantly coordinated by market mechanisms, where the state interferes only by supporting the most vulnerable populations. These studies seek to establish how close the housing system came to this ideal state in various areas, such as housing finance, construction, the subsidy system, etc. (Renaud 1995a, 1995; Hegedüs et al. 1996; Tsenkova 2009, Pichler-Milanovich 2001). This 'transition to the market' approach (Lowe 2004: 166) lost significance in the 2000s. Researchers were less and less likely to assumethat these housing systems weredeveloping along the same lines. These later studies were closer to the institutional approach and emphasised path dependency (Lux 2009; Stephens et al. 2015; Hegedüs and Horváth 2017; Hegedüs and Struyk 2005; Lux and Sunega 2014).

There were three major junctures in the development of the housing regimes in the region, which were characterised by significant changes in external (macroeconomic) factors. The first juncture was the transition itself. The second was around the year 2000, when the Central and Eastern European economies emerged from their post-transition crises and entered a period of rapid growth and modernisation. The third was the global financial crisis of 2008. The national responses to these junctures influenced the various countries' subsequent development.

The countries in the region have many similarities in the context of the global economy. After the change of regime, they all emerged as multi-party democracies; they had a relatively well-educated and inexpensive workforce. Nearly all have faced negative demographic development. Social and spatial inequalities have been growing, as have social tensions. Despite vast improvements since the early 1990s, the role of the informal economy remains more important than in the old EU member states, which limits the possibilities of the national welfare systems because tax revenuesare thus reduced and it is difficultto provide targeted support.Common trends in housing systems across the region include: housing privatisation,

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

the slow and contradictory restructuring of the housing finance system, the role of prefabricated housing from the 1970s and 1980s, the informality of private rental markets, the prominent role of intergenerational transfers, residual 'familialism', and the marginalisation of the most vulnerable groups. These features can be illustrated using the housing sector matrix (Figure 2.) These economic and social processes created different challenges for housing policy. The first period, roughly between 1990 and 2000, was characterised by housing privatisation, the management of'old loans' (from the communist period), and the creation of the legal and institutional framework for market-based housing finance. Overall, new housing production decreased across the region. The second period leveraged the economic upturn following the transition crisis. Housing production increased again, although it remained well below pre-1990 rates. The demand for affordable rental housing also rose significantly, but the focus of housing programmes remained on supporting construction and property acquisition. After 2008, the crisis wrecked mortgage lending, and housing policy began to focus on managing defaulted loans. By around 2015, countries had largely returned to pre-2008 development trends.

Even though similarities are widespread and salient, the factors mentioned above also generated differences and some outliers. These have been shaped by the differing goals and ambitions of national political elites, economic policies (particularly the dominance of populist and/or conservative fiscal schools), and the leading national housing policy approaches. Comparative studies demonstrate different institutional responses to similar challenges in the cells of our housing sector matrix. These have been discussed in depth in the comparative housing literature, often using an institutionalist approach (Hegedüs et al. 2011; Lux and Sunega 2014). The studies show that there are several outliers. For instance, the slower Czech privatisation process, which laid greater emphasis on restitution, led to a larger private rental sector.In Slovakia, public housing construction has receivedfar more support than in most of the other countries in the region. In Poland, the Bausparkasse model was rejected.The Baltic states were quick to adopt foreign exchange-denominated (ForEx) mortgage loans (with Scandinavian financing institutions playing a more important role than elsewhere). In Hungary, state-subsidised mortgage lending between 2000 and 2004 paved the way for the subsequent popularity of inexpensive ForEx mortgage loans and had to be addressed with massive and 'unorthodox' correction programmes after the crisis. Romania and Bulgaria began developing their own market-based housing finance systems slightly later and more gradually.

Despite these differences, some basic common problems remained. These include the lack of institutions for investing in social and affordable housing; the difficulty of managing multi-unithousing in the fragmented ownership patterns of the post-privatisation era and the lack of efficient risk management and adequate regulation in mortgage lending. At this point, no significant social or political forces seem to be able to divert the housing regimes from this trajectory.

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

References

Akerlof, G. A., R. J. Shiller 2009. *Animal spirits: how human psychology drives the economy, and why it matters for global capitalism*. Princeton: Princeton University Press.

Akerlof, G. A., R. J. Shiller 2015. *Phishing for phools: the economics of manipulation and deception*. Princeton: Princeton University Press.

Alexeev, M. 1990. 'Distribution of housing subsidies in the USSR, with some Soviet-Hungarian comparison.' *Comparative Economic Studies* 32: 138-157.

Alexeev, M. 1988. 'Market vs. Rationing: The Case of Soviet Housing.' *The Review of Economics and Statistics* 70 (3): 414–420. DOI: 10.2307/1926779.

Ball, M., M. Harloe 1992. 'Rhetorical barriers to understanding housing provision: What the 'provision thesis' is and is not.' *Housing Studies* 7 (1): 3-15. DOI: 10.1080/02673039208720719.

Barlow, J., S. Duncan 1994. *Success and failure in housing provision: European systems compared*. Oxford: Butterworth-Heinemann.

Beng-Huat, C. 1997. *Political Legitimacy and Housing: Stakeholding in Singapore*. Andover: Routledge.

Bengtsson, B., H. Ruonavaara 2010. 'Introduction to the special issue: Path dependence in housing.' *Housing, Theory and Society* 27 (3): 193–203. DOI: 10.1080/14036090903326411.

Bertaud, A., B. Renaud 1997. 'Socialist cities without land markets." *Journal of Urban Economics 41 (1):*, 137-151. DOI: 10.1006/juec.1996.1097.

Boelhouwer, P. 1993. 'Housing Finance in Seven European Countries: Financial Instruments and Government Expenditure.' *Netherlands Journal of Housing and the Built Environment* 8 (4): 405–420.

Clapham, D. 2002. 'Housing Pathways: A Post Modern Analytical Framework.' *Housing, Theory and Society* 19 (2): 57–68. DOI: 10.1080/140360902760385565.

De Decker, P. 2002. 'On the Genesis of Social Rental Agencies in Belgium.' *Urban Studies* 39 (2): 297–326. DOI: 10.1080/00420980120102984.

De Decker, P., R. Owen, J. Verstraete 2017. 'The Private Renting in Social Housing Provisions: Social Rental Agencies in Western Europe" Pp. 333-360 in J. Hegedüs, M. Lux and V. Horváth (eds.) *Private Rental Housing in Transition Countries – an alternative tp owner occupation*? Palgrave.

Dewilde, C. 2017. 'Do Housing Regimes Matter? Assessing the Concept of Housing Regimes through Configurations of Housing Outcomes: Do Housing Regimes Matter?' *International Journal of Social Welfare* 26 (4): 384–404. DOI: 10.1111/ijsw.12261.

Dewilde, C., P. De Decker 2016. 'Changing Inequalities in Housing Outcomes across Western Europe.' *Housing, Theory and Society* 33 (2): 121–61. DOI: 10.1080/14036096.2015.1109545.

Doling, J. 1999. 'De-Commodification and Welfare: Evaluating Housing Systems.' *Housing, Theory and Society* 16 (4): 156–164. DOI: 10.1080/14036099950149884.

Hans-Joachim, D. 2014. 'Transatlantic Mortgage Crisis – the Role of Structures and Regulations.' Pp. 112-146 in S. Wachter, M. Cho, M. Joong Tcha (eds.) *The Global Financial Crisis and Housing – A New Policy Paradigm*. Cheltenham: Edward Elgar.

Elsinga, M., H. Lind 2012. 'The Effect of EU-Legislation on Rental Systems in Sweden and the Netherlands.' *Housing Studies* 28 (7): 960-970. DOI: 1 0.1080/02673037.2013.803044.

Esping-Andersen, G. 1990. *The three worlds of welfare capitalism*. New Jersey: Princeton University Press.

Fitzpatrick, S., M. Stephens 2014. 'Welfare Regimes, Social Values and Homelessness: Comparing Responses to Marginalised Groups in Six European Countries.' *Housing Studies* 29 (2): 215–34. DOI: 10.1080/02673037.2014.848265.

French, R.A., Hamilton, F.E.I. (eds.) 1997. *The socialist city: spatial structure and urban policy*. Chichester: John Wiley.

Grout, P. A., A. Zalewska 2004. 'The impact of regulation on market risk.' *Journal of Financial Economics* 80 (1): 149-184. DOI: 10.1016/j.jfineco.2005.02.006.

Hall, P. A., D. Soskice 2001. *Varieties of Capitalism: The Institutional Foundations of Comparative Advantage*. Oxford: Oxford University Press.

Harloe, M. 1982. 'Towards the Decommodification of Housing? A Comment on Council House Sales.' *Critical Social Policy* 2 (4): 39–42. DOI: 10.1177/026101838200200406.

Hegedüs, J. 1992. 'Self help housing in Hungary.'Pp. 217-231 in: K. Matey (ed.) *Beyond Self-Help Housing*. München: Profil Verlag.

Hegedüs, J., M. Lux, P. Sunega 2011. 'Decline and depression: the impact of the global economic crisis on housing markets in two post-socialist states.' *Journal of Housing and the Built Environment* 26 (3): 315-333. DOI: 10.1007/s10901-011-9228-7.

Hegedüs, J., A. Puzanov 2017. 'The Private rental Sector Under Socialism.' Pp. 41-69 in: J. Hegedüs, M. Lux, V. Horváth (eds) *Private Rental Housing in Transition Countries – an alternative to owner occupation?* Londo: Palgrave Macmillan.

Hegedüs, J., V. Horváth, M. Lux 2017. 'Central and East European housing regimes in the light of private rental sector development.' Pp. 387-411 in J. Hegedüs, M. Lux, V. Horváth (eds) *Private Rental Housing in Transition Countries – an alternative to owner occupation?* Londo: Palgrave Macmillan.

Hegedüs, J., R. Struyk 2005. 'Divergences and Convergences in Restructuring Housing Finance in Transition Countries.' Pp. 3-41 in J. Hegedüs, R. Struyk (ed.) *Housing Finance: New and Old Models in Central Europe, Russia and Kazakhstan*. Budapest: Open Society Institute.

Hegedüs, J., N. Teller 2007. 'Hungary: Escape into homeownership.' Pp. 133-169 in M. Elsinga, P. De Decke, N. Teller, J. Toussaint (eds.) *Homeownership beyond asset and security* - Perceptions od housing related and insecurity in eight European countires. Amsterdam: IOS Press.

Hegedüs, J., I. Tosics 1996. 'Disintegration of East-European Housing Model.' Pp. 15-39 in D. Clapham, J. Hegedüs, K. Kintrea, I. Tosics (eds.) *Housing Privatization in Eastern Europe.* Westport: Greenwood.

Hegedüs, J., V. Horváth, N. Tosics 2014. 'Economic and legal conflicts between landlords and tenants in the Hungarian private rental sector.' *International Journal of Housing Policy* 14 (2): 141-163. DOI: 10.1080/14616718.2014.908571.

Hoekstra, J., I. Saizarbitoria, A. Etxarri 2010. 'Recent changes in Spanish housing policies: Subsidized owner-occupancy dwellings as a new tenure sector?' *Journal of Housing and the Built Environment* 25 (1): 125-138. DOI: 10.1007/s10901-009-9169-6.

Kemeny, J. 1981. *The Myth of Home Ownership: public versus private choices in housing tenure*. London: Routledge.

Kemeny, J. 1995. *From Public Housing to the Social Market: Rental Policy Strategies in Comparative Perspective*. London: Routledge.

Kemeny, J. 2001. 'Comparative housing and welfare: Theorising the relationship.' Journal of Housing and the Built Environment 16 (1): 53–70. DOI: 10.1023/A:1011526416064.

Kemeny, J. 2006. 'Corporatism and Houisng Regimes.' *Housing, Theory and Society* 23 (1): 1-18. DOI: 10.1080/14036090500375423.

Kemp, P., S. Kofner 2010. 'Contrasting Varieties of Private Renting: England and Germany.' *International Journal of Housing Policy* 10 (4): 379–398. DOI: 10.1080/14616718.2010.526401.

Lowe, S. 2004. *Housing Policy Analysis: British Housing in Cultural and Comparative Context*. Houndmills, Basingstoke, Hampshire ; New York: Palgrave Macmillan.

Lundqvist, Lennart J. 1990. 'Rolling Stones for the Resurrection of Policy as the Focus of Comparative Housing Research.' *Scandinavian Housing and Planning Research* 8 (2): 79-90. DOI: 10.1080/02815739108730262.

Lux, M. 2009. *Housing policy and housing finance in the Czech Republic during transition. An example of the schism between the still-living past and the need of reform.* Amsterdam: Delft University Press.

Lux, M., P. Sunega 2014. 'Public Housing in the Post-Socialist States of Central and Eastern Europe: Decline and an Open Future.' *Housing Studies* 29 (4): 501–519. DOI: 10.1080/02673037.2013.875986.

Malpass, P. 2008. 'Housing and the New Welfare State: Wobbly Pillar or Cornerstone?' *Housing Studies* 23 (1): 1-19. DOI: 10.1080/02673030701731100.

Malpezzi, S., S. K. Mayo 1997. 'Getting Housing Incentives Right: A Case Study of the Effects of Regulation, Taxes and Subsidies on Housing Supply in Malaysia.' *Land Economics* 73 (3): 372–391. DOI: 10.2307/3147174.

Mandic, S., D. Clapham 1996. 'The Meaning of Home Ownership in the Transition from Socialism: The Example of Slovenia.' *Urban Studies* 33 (1): 83–97. DOI:10.1080/00420989650012130.

Matznetter, W. 2002. 'Social Housing Policy in a Conservative Welfare State: Austria as an Example.' *Urban Studies* 39 (2): 265–282. DOI: 10.1080/00420980120102966.

Matznetter, W., A. Mundt 2012. 'Housing and Welfare Regimes.' Pp. 274-294 in D. F. Clapham, W. A. V. Clark, K. Gibb (eds) *The SAGE Handbook of Housing Studies*. London: Sage Publications.

Mukhija, V., L. Regus, S. Slovin, A. Das 2010. 'Can Inclusionary Zoning Be an Effective and Efficient Housing Policy? Evidence from Los Angeles and Orange Counties.' *Journal of Urban Affairs* 32 (2): 229–252. DOI: 10.1111/j.1467-9906.2010.00495.x.

Padovani, L. 1996. 'Italy.' Pp. 188-209 in P. Balchin (ed.) *Housing Policy in Europe*. London: Routledge.

Pichler-Milanovich, N. 2001. 'Urban Housing Markets in Central and Eastern Europe: Convergence, Divergence or Policy 'Collapse.' *International Journal of Housing Policy* 1 (2): 145–187 DOI: 10.1080/14616710110083416.

Polanyi, K. 2001. *The Great Transformation. The Political and Economic Origins of Our Time.* Boston: Beacon Press.

Renaud, B. 1995a. 'The Real Estate Economy and the Design of Russian Housing Reforms Part I.' *Urban Studies* 32 (8): 1247–1264. DOI: 10.1080/00420989550012447.

Renaud, B. 1995B. 'The Real Estate Economy and the Design of Russian Housing Reforms Part II.' *Urban Studies* 32 (9): 1437–1451. DOI: 10.1080/00420989550012339.

Ruonavaara, H. 1993. 'Types and forms of housing tenure: Towards solving the comparison/translation problem.' *Scandinavian Housing and Planning Research* 10 (1): 3-20. DOI: 10.1080/02815739308730315.

Salvi del Pero, A. 2016. *Housing policy in Chile: A case study on two housing programmes for low-income households (* OECD Social, Employment and Migration Working Papers No. 173).

Volume 7 | Issue 1 | 2020 | 49-62
Available online at www.housing-critical.com
http://dx.doi.org/10.13060/23362839.2020.7.1.503

Retrieved from OECD website:https://www.oecd-ilibrary.org/social-issues-migration-health/housing-policy-in-chile_5jm2hzbnqq33-en.

Saraceno, C. 2016. 'Varieties of familialism: Comparing four southern European and East Asian welfare regimes.' *Journal of European Social Policy* 26 (4): 314-326. DOI: 10.1177/0958928716657275.

Scanlon, Kathleen, Christine M. E. Whitehead, and Melissa Fernández Arrigoitia, eds. (2014) *Social Housing in Europe*. Real Estate Issue. Hoboken, New Jersey: Wiley Blackwell, 2014.

Schwartz, H., L. Ecola, K. J. Leuschner, A. Kofner 2012. *Is Inclusionary Zoning Inclusionary? A Guide for Practitioners*. Santa Monica: RAND Corporation.

Stephens, M. 2011. 'Comparative Housing Research: A 'System-Embedded' Approach.' *International Journal of Housing Policy* 11 (4): 337–355. DOI: 10.1080/14616718.2011.626598.

Stephens, M., M. Lux, P. Sunega 2015. 'Post-Socialist Housing Systems in Europe: Housing Welfare Regimes by Default?' *Housing Studies* 30 (8): 1210–1234. DOI: 10.1080/02673037.2015.1013090.

Tosi, Antonio 1990. „Italy." Pp. 195-220 in W. Vliet (ed) *International Handbook of Housing Policies and Practices*. Westport: Greenwood Press.

Tsenkova, S. 2009. *Housing Policy Reforms in Post Socialist Europe: Lost in Transition*. Berlin: Springer.

World Bank 1993. *Housing: Enabling Markets to Work*. Washington DC: The World Bank.