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**Social housing in Portugal and Italy: methodological issues and  
empirical inferences of a comparative study**

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## **Abstract**

This working paper aims to clarify some aspects of social housing in Portugal and Italy in order to start a comparative analysis of the interventions in social housing neighbourhood's case studies in the two countries. Divided into three parts, the paper initially discloses an explanation of methodological issues for a housing comparative study, especially for the Southern Europe countries, continuing with the description of housing concepts used in Portugal and Italy and concluding with a preliminary comparison. Despite having the same percentage of social housing, Portugal and Italy are different in the way how to deal with it and this research longs to explain it. The study offers methodological directions on how to conduct a housing comparative research and displays a starting comparison on statistical data, political genealogies, normative concepts and historical frameworks. The purpose is to settle a theoretical basis and reveal some outcomes from the analysis of the social housing in the two countries. This work seeks to contribute to the general debate of comparative housing studies of Southern Europe.

**Keywords:** Social housing, Housing policies, Comparative analysis, Portugal, Italy

## **Introduction**

A research on housing can be quite revealing about the social services offered by the State, because “the rise and fall of public housing is an indicator of the rise of social welfare” (Short, 2006:196). This explains the required connection between welfare and housing and the reason why national housing studies are connected to the welfare studies, especially in academic researches.

In the industrialized societies, social housing is inextricably linked with the welfare state because the State principally supports who is in disadvantaged conditions.

Defined as a sectoral policy or a political instrument (Bengtsson, 2001), the welfare state is a feature of modern states with the purpose of reducing social inequalities, aiming to provide and guarantee social rights and services, such as health care, public education, social security, approach to cultural resources and access to housing for those in disadvantaged conditions.

Housing is part of the welfare state determined by the public policies and, at the same time, is affected by unstable market rules, thus resulting as the "fourth wobbly pillar of welfare" (Torgesen, 1987). In addition to this, the English sociologist Jim Kemeny has sought how housing is structured with the welfare system, building some innovative theories to understand the relation of housing with other areas of welfare and the link between housing and the social relations, which will be taken here as theoretical basis for the article.

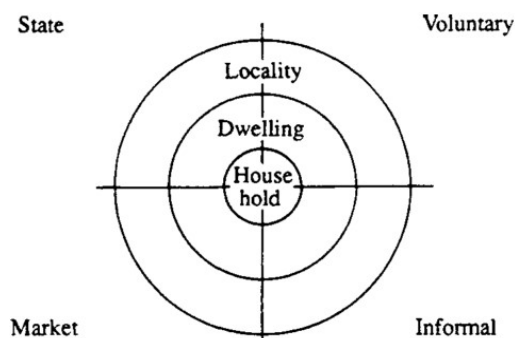
As opposed to other areas of welfare - education, health, work, retirement pensions - based on the universalistic principle of public provision or available to all without distinction, housing is supposed only for a minority and after rigorous selection checks (Kemeny, 1992: 64).

Another distinguishing factor from other dominions of welfare is that housing is a sector characterized by a high capital intensity, which can easily be noticeable through public programs, mainly implemented after the Second World War, and that demanded a huge investment of the State to provide the housing stock (Kemeny, 2001).

In fact, for most European countries the large construction of public housing occurred after the Second World War, due to the reconstruction of the cities and, mostly, due to the movement of workers from the countryside to the cities that led to a huge demand for housing.

Regarding the enormous building construction in that period, housing was often thought as a "brick and mortar" question and constantly considered as a merely necessity of dwellings; but housing is more than that, encompassing the analysis of social, economic and political relations and including the main aspects of daily families lives (Kemeny, 1992: 8).

In this sense, housing reveals a high level of correlation on the entire social structure while affecting lifestyles, urban form, well-being and quality of life (Kemeny, 2001), and this could be expressed in three concentric rings including household (typology, age, socioeconomic status, etc.), physical accommodation or dwelling (type, size, conditions, etc.) and locality (complementary structures, transports, social characteristics of the neighbourhood, etc.) that all constitute the concept of residence (Kemeny, 1992: 78). (Figure 1)



**Figure 1:** The three concentric circles of the Kemény's theory. Source: Kemény, 1992: 78.

Due to its shaky role in public policies and depending on the state-market relationship, housing is less considered as a welfare's area and almost not measured in welfare studies. According to Kemény, in order to further develop the housing researches in welfare theories, it is necessary to build anchored housing studies in a solid theoretical framework connecting other areas of welfare (transports, work, salaries, planning, etc.) (Kemény, 2001).

For instance, the connection between housing and planning is almost unexplored in comparative welfare research and out of a linear and taxonomic approach, even if some studies are starting to use other methods such as genealogic one (Tulumello *et al.*, 2018).

Reflecting upon this perspective, it is possible to identify how Portugal and Italy have been following different paths regarding social housing as a consequence not only from the historical events but also from urban planning that has been altering the form and the character of the cities.

Furthermore, it is important to add two factors that are changing the way of reflecting upon housing in national studies: firstly, housing is not only related to build dwellings, but represents a more comprehensive concept of living, including family and community relations, accessibility, adequate services, etc.; secondly, various actors and different forms of access are recently increasing its presence and influence in the social housing scenario, in opposite to the last century in which social housing was provided almost entirely by the State.

In this sense it is common to see two countries having similar size of public leasing sectors but looking more deeply they can differ from each other (Kemény, 1992: 72, 77-78).

According to the last Housing Europe's report, Portugal has 2% and Italy 3% of social housing among all the entire housing stock (Housing Europe, 2017), but if we look beyond these similar numbers we will find a lot of differences and understand how social housing is considered in the two countries.

This working paper then seeks to discuss how two countries with approximately the same percentage of social housing, actually diverge in many features: from the different welfare regimes

to the concepts used, the age of the housing stock, the main housing topics discussed nowadays and so on.

### **Methodological issues in comparative analysis**

Before starting with some theoretical and empirical reflections on the research, it is convenient to understand the methodology for comparing countries, especially used in studies of political sciences. According to Landman (2003), there are four objectives that justify the comparison between countries, summarized below.

A complete comparative research needs to describe the object in depth in order to know how the politics phenomena and the events of a country or group of countries occurred. After that, categorizing the information under a classification helps to make the data less confusing and complex and to organize the empirical evidence. Only after the establishment of a clear framework of the data, it is possible to look for the factors which help to explain what it was described and organized. The hypothesis-testing focuses on elimination of rival explanations on particular events, actors, structures and so on, in order to build more general theories. Finally, the last objective is related with conceiving predictions in relation to other countries or claims on future politics results. Theories are necessary to develop this final part, but they cannot be done without the previous steps, namely a classification, a good description and hypothesis-testing. Hence the four objectives are connected among them and only if each one of them is well developed it is possible to achieve fruitful outcomes from the comparison.

Furthermore, this type of comparative research needs to establish the number of countries you want to compare in order to recognize which features stand out. Firstly, it is pertinent to recall that the dimension of the comparative research under development should be outlined according to the time and resources of the researcher, so that reasonable decisions can be made. Secondly, the decision to compare many or few countries or undertake single-country studies depends on the purpose of the research which leads to an inextricably level of abstraction, as showed in the table below (Figure 2):

Level of abstraction	High	<b>Comparing many countries</b>		
	Middle	<b>Comparing few countries</b>		
	Low	<b>Single-country studies</b>		
		One	Few (<20)	Many (>50)
		Scope of countries		

**Figure 2:** Methods of comparison based on Sartori (1970) and Mair (1996). Sources: Landman, 2003: 25

Comparing many states requires a high level of abstraction: the advantage is to have the statistical control that guides rival explanations, but the disadvantage is to have a weak description of the causes of the events. This method is called “variable-oriented” because it focuses on general dimension of macro-social variations. On the other hand, the “case-oriented” method will be applicable if we aim to compare few states and distinguish similarities and differences among countries rather than an analytic relation in the variables. This method is divided in two types of design, known as the Mill’s method of agreement: most similar systems design (MSSD) – comparing politics systems sharing common characteristics – and most different systems design (MDSD) – comparing countries without, or with scarce, common characteristics.

Single-country studies are considered comparative if we use concepts applicable in other countries seeking to do broader inferences. Only this kind of studies permits to reach all the four objectives above explained, with a deep understanding of studied countries. Nevertheless, the main disadvantage may be to suffer much difficulty to build generalizations applicable to a global level (*Ibidem*: 26-34).

These aspects constitute the generic basis for comparative studies; however, the comparative housing studies contain other specific characteristics stemming from the latest and actual currents.

Different approaches becoming important come from the last decades of twentieth century (1980-1990): on one hand, particularistic approaches are theoretically less developed but highly empirically developed, seeing each country as exceptional and, on the other hand, universalistic approaches regard countries as being subject to the same global imperatives (e.g. capitalistic logics, market failures, structural privatization) described as a process of convergence based on the neo-liberal transformation of welfare states. Among these approaches there are studies that develop

middle range theories distinguishing a middle way system between particular and universal ones, such as the one suggested by Kemeny & Lowe (1998).

This last approach seems the most reasonable for this research, which wants to analyse data from Portugal and Italy under two interpretations: placing them in the European housing studies that follow universalistic tendencies, and enlarging the housing knowledge that show peculiarities of the country.

For this matter, it is also important to define the methodology, including what to compare (contexts, mechanisms, results), and which types of data should be gathered.

To sum up, my expectation for this research is to reach a low or, at least, a middle level of abstraction, because while comparing some aspects in Portugal and Italy I want to accomplish a deep comprehension of them such as in single-country studies.

### **‘Learning from the South’<sup>1</sup> for housing issues**

As previously mentioned, housing is explained within the welfare regime adopted by the country.

The Esping-Andersen’s theory (1990) examines the welfare regime adopted in 18 western countries, categorizing them in three clusters: social-democratic, corporatist and liberal.

- The liberal model guarantees support for a well-defined population range with low economic resources. The state encourages the market, guaranteeing only the minimum of social services with subsidies and limiting social housing. It is common in the United States, Canada, Australia and many Western European countries.
- In the corporatist model it is not the liberal conception that predominates, but the protection of the family status. This model is linked to the preservation of the traditional structure of the family. Deriving from the Catholic tradition, the State follows the principle of subsidiarity, interfering when the family's economic capacity is exhausted. We can find it in Austria, France, Germany and Italy.
- The Scandinavian countries are part of the social-democratic regime. Instead of tolerating a dualism between the working and the middle class, it promotes equality of the highest standards for all, thus is focused on decommodification and it is also called universal model (Esping-Andersen, 1990: 26-28).

According to this classification, Southern Europe countries are not mentioned, apart from Italy, which is included in the corporatist welfare regime due to the Catholic Church’s Italian tradition. However, if we consider other features presented below, we would dismiss this model.

To implement a successful comparison between Portugal and Italy, it is necessary to recognize the principal traits that characterize these countries. For that measure, this work follows with Allen

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<sup>1</sup> Boaventura Sousa Santos coined this phrase, meaning that the hegemonic, Northern, Western countries and their theoretical frameworks should be enriched by South experiences (Santos, 1996).

(2004) and Allen et al. (2006) suggestions for comparative studies on Southern Europe countries<sup>2</sup> that report similar characteristics:

- 1) high levels of home ownership and relatively low levels of social housing;
- 2) high levels of second homes, deriving from large-scale and relatively recent rural/urban migrations and specially built tourist developments, even if it is not easy to measure this phenomenon;
- 3) the extended family plays an important role in the provision of homeowners;
- 4) self-promotion and self-production are important to ensure access to housing (Allen, 2006).

Through the addition of a qualitative methodology and not only a quantitative one as Esping-Andersen had used, housing in the Southern European countries is thus recognized as a fourth welfare regime, unidentified before, with historical and cultural features which link all the countries.

The idea of representing those countries with dissimilar characteristics does not intend to display the 'lagging behind' feature concerning the providing of social services in comparison to the Northern European countries, but to stress the concept of the public action beyond the mere relation State-market. This theory, explained in the book *Housing and Welfare in Southern Europe* (Allen et al., 2004), can be summarized by some fundamental concepts which indicate the factors of conception and production of housing policies in the countries of Southern Europe:

- The concept of family in the South is according to Allen et al., 2004, namely related to an extended family, defined in the book by the Italian term *parentela*, which greatly influences the access to housing and its development.
- Heritage is the term which identifies the property to be preserved and maintained in the family. This concept has a material facet but also an emotional trait and a symbolic profile and defines the strong relationship with family practices. The property simulates the anticipation of the home by the young married family members and allows the access for the second home (or holidays homes).
- Another fundamental concept is self-promotion, which derives from the responsibility of the family to provide accommodation to its members. The capacity for self-promotion is linked to rural self-construction traditions, adapted to urban situations and encouraged by weak systems of public control over the territory. This type of practice had its peak in the 60s and 70s in all the Southern Countries with widespread unauthorized self-construction in peri-urban areas (*Ibidem*: 4-7).

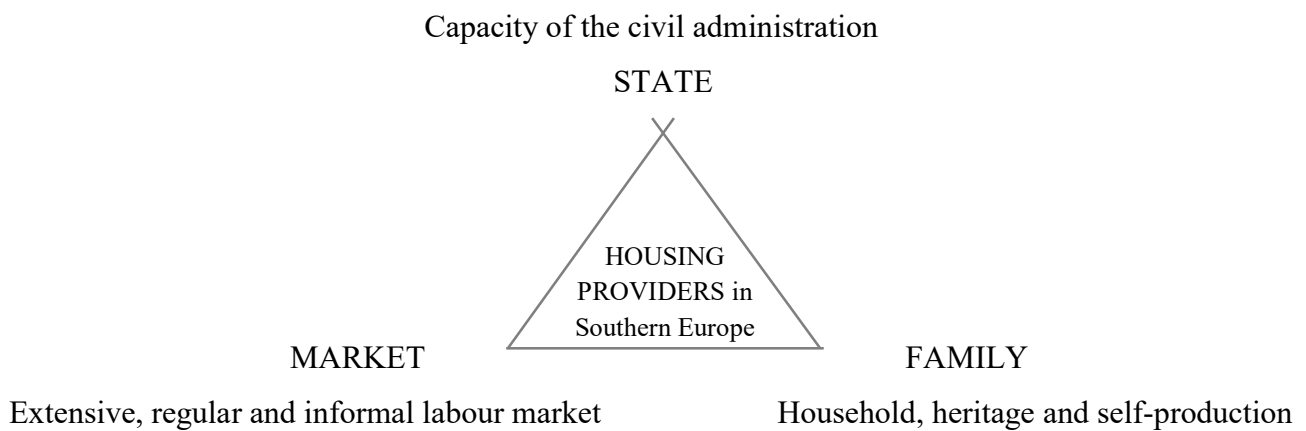
The model below shows how strong is the role of the family in the housing study of Southern Europe. Indeed, contrary to the common literature, family here is not seen as the passive beneficiary

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<sup>2</sup> The idea of Southern Europe (or also called Mediterranean) countries means the cluster including Portugal, Spain, Italy and Greece, or else the countries analyzed in the literature about comparative housing studies in Southern Countries.



of welfare policies or as victims of bankruptcies market, but is placed with an active role for the well-being of the household, serving as one of the providers for the access to housing (Figure 3):



**Figure 3:** Suggestion of an explanation of the welfare triangle about housing in the Southern Europe. Source: own processing.

If on one hand family plays an extremely important role, on the other hand the state tends to take advantage of this configuration, supporting policies of tax subsidies for the access to home ownership. This approach demonstrates the concept of ‘public action’, as a typology of states in relationship to the major providers of household welfare involved: market, family and civil society (Allen *et al.*, 2004: 186); this relationship is also called ‘the happy joint venture’ (Pinto, 2017).

To sum up, these three socio-economic institutions shape the southern welfare system:

- 1) the capacity of the public action expressed as less direct state intervention, less targeted, the weakness of controls on land use and the absence of a large sector of social policies;
- 2) the link between formal and informal labour market that influences the access to housing through a dualism between the over-protected and the under-protected workers. The first corresponds to workers without a fixed term and have access to a stability on the market and home loans (as well as the virtually impossibility of losing their jobs, good retirement pensions, etc.); the other typology is composed by precarious workers with very small or no social guarantees at all.
- 3) the operations of extensive family networks (*parentela*, also called *familialism*) in the distribution of welfare, providing autonomously housing to the same members (*Ibidem*: 94)

In addition to this, other studies that reflect on the concept of housing in southern Europe, have discovered a synergy with other dimensions of welfare, for instance with the pension system. There is a correlation between high residential property and the social security system defined by a ‘real big trade’ because, as suggest by Castles & Ferrera (1996), the homeowners more easily guarantee

their safety in old age since low pensions do not propitiate the payment of housing or even living adequately.

Nevertheless, it is worth mentioning that nowadays this ‘Mediterranean model’ is gradually changing its structure, due to job precariousness, geographical mobility, the paradigm shift of public resources, and so on. In Southern European countries, the public action regarding housing policies was recently changed, as accounted by Padovani (2011):

- providing a product (‘support to the brick’) to offer resources to families (‘to the person’);
- being established the reduction of the contribution of the State in the provision of social housing;
- strengthening the privatization of public assets and the public housing stock;
- granting functions exclusively public to new semi-public or private partners.

These transformations, largely due to the crisis, are processed in different approaches, according to each country and sometimes with successful results on small and local experiments (Padovani, 2011).

This brief framework helps to clarify the institutional structure of housing in Southern Europe and propose how to develop a “South-inspired” theoretical approach in opposition to the only “North-inspired” one (Allen, 2006; Lawson *et al.*, 2009).

This type of tactic could be called ‘learning from the South’ (Santos, 2016), justifying the possibility to build a general theoretical literature which permits to extrapolate patterns recognized within countries in exam, instead of using models of northern countries; always considering that several recent transformations and other ways of compare are equally possible (Alves, 2016).

### **A vocabulary for social housing**

There is no common definition of ‘social housing’ with similar meaning to all countries, at least across Europe, concerning the legal status of the landlord, rent regime, funding method or target population, and in some cases, there are also huge differences in the semantic diversity of the meanings used for the same word in the same country (Housing Europe, 2017; Braga & Palvarini, 2013).

This means that we cannot use a unique term referring to social housing in a cross-national way because that definition depends on local housing policies as well as on specific historical and cultural circumstances concerning each country.

Furthermore, not only a single European definition does not exist but if it existed would be quite problematic, due to the housing regime adopted from each country, influenced by four dimensions: the tenure, the provider of the service, the beneficiaries and the funding arrangements.

In the European scenario “social housing is indeed characterized by the wide diversity of national housing situations, conceptions and policies across member states” (CECODHAS, 2012).

Despite this huge variety, in one report of the European Parliament<sup>3</sup>, we find three common elements about social housing across EU Member States: “i) a mission of general interest, ii) the objective of increasing the supply of affordable housing, iii) the identification of specific targets defined in terms of socio-economic status or the presence of vulnerabilities”.

Each European country answers to these issues in different ways, from which we can classify three models of housing system: universalistic, targeted generalist or residual, and, as we can see, this classification is somehow linked to the Esping-Andersen’s welfare theory, explained above, in which the countries are divided in three welfare regimes: liberal, corporatist and social-democratic.

The universalistic model considers housing as a primary responsibility, and therefore the target of the public is to provide the entire population decent quality accommodation at an affordable price. The targeted model believes that the market is responsible for allocating housing resources to individuals, so the goal is to satisfy only the excess demand for housing that is not met by the market. This last model can be generalist, if the accommodation is assigned based on the level of income, or residual if it is assigned according to a series of indicators of vulnerability. Under this classification and the percentage of the social housing, we can group the European countries, following CECODHAS (2012) and HOUSING EUROPE (2017) in the Figure 4:

Welfare regimes and percentage of social housing in EU			
	UNIVERSAL	TARGETED	
		GENERALIST	RESIDUAL
Large (≥ 19%)	Netherlands Denmark Sweden	Austria	
Medium (11%-18%)		France Finland	United Kingdom
Small (5%-10%)		Belgium Czech Republic Poland Slovenia	Ireland Malta
Very small (0%-4%)		Luxemburg Germany Italy Greece	Slovakia Romania Estonia Croatia Hungary Cyprus

<sup>3</sup> BRAGA M., PALVARINI P. (2013) *Social Housing in the EU*, Brussel, European Parliament

			Portugal Bulgaria Lithuania Latvia Spain
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**Figure 4:** Table on welfare regimes and percentage of social housing in Europe. Source: CECODHAS, 2012 updated with data from HOUSING EUROPE, 2017 (in red, the countries that have seen social housing decreased, in blue, those that have been increasing it and in grey, those that were not mentioned in the previous report)

Despite the diversity of the welfare regime adopted, the national housing policies and the local choices, we might think that a definition in general lines should contain dwelling at controlled or subsidized costs in order to cope with the economic needs of (a part of) population.

Hence, there should not be difference among dwellings totally built by the State or through agreements with public subsidies and dwellings funded by non-profit or privates' entities, when the purpose is the same, namely to provide adequate dwellings at affordable costs.

If we look at the "Encyclopaedia of Housing" (2012) we can find two connotations which help us to understand a general concept of social housing: the first one refers to all types of dwelling which receive form of public subsidies, either directly and indirectly, including tax reliefs, mortgage interests, tax shelter for ownership and so on; the second one concerns the traditional public housing, namely subsidized by the State but also includes cooperatives, social agencies, community groups, non-profit private firms, etc. (Braga & Palvarini, 2013).

The use of the first or the second meaning depends on the definition of social housing used by each country, that indeed reflects the national policies adopted (Whitehead & Scanlon, 2007).

Under the context of this debate, the absence of a single, uniformed and standardized definition of 'social housing', it becomes also important to elucidate about the two analysed countries here, to create a convenient sort of 'vocabulary of housing'.

The official meaning of social housing in Italy is fairly recent. It appears for the first time in 2008<sup>4</sup> in a national law which defines *Alloggio Sociale* (although slightly incorrect as it is mainly translated with Social Housing) as the dwellings built or rehabilitated through public contributions or through the use of public land, given in concession to private or third sector for several years to be rented or sold at affordable prices, with the goal of achieving a social mix.

The target of *Alloggio Sociale* is called "gray band", i.e. the middle-low class families in a period of social and economic difficulty for the loss of work, marital separation, etc. In this sense, the provided solutions are set to fight temporary problems under provisional conditions, even up to 18

<sup>4</sup> Decree 22 April 2008 of the Ministry of Infrastructure, published in the Official gazette n.146 del 24-6-2008

months. The National Housing Plan<sup>5</sup> has reinforced this model with new forms of public-private partnerships and the creation of an integrated real estate fund, set up for a national fund (*Cassa Depositi e Prestiti* is the main shareholder) and a network of funds for financing social housing (CECODHAS, 2012).

This new model has been implemented in few examples, revealing a paradigm shift and, at the same time, a challenge, especially for the public sector which has not yet clearly defined its role.

On the other hand, *Alloggio sociale* creates a huge confusion in the Italian scenario of social housing, because this concept is wrongly defined as the only national social housing program in Italy. This is because social housing should include not only the public-private or non-profit residential park but also the public one, as it is conceived in the Northern European countries.

In fact, this new Italian model does not fully illustrate the Italian situation, to which we should must add the public housing, built especially after the post-war period during the home emergency.

The largest part of the current social housing stock is represented by the public housing (*Edilizia Residenziale Pubblica* – ERP), owned and managed by the former<sup>6</sup> *Instituti Autonomi per le Case Popolari (IACP)*, public economic bodies with different nomenclatures depending on the Regions, with the task of providing housing for low-income families or belonging to particular social categories, anyhow registered in municipal lists for housing.

The structure of the public housing sector is characterized by three large areas of intervention, which represent the types of subsidies which financed it: subsidized, agreed and assisted. They are explained and categorizing for meanings, financial mechanisms and providers in the table below (Figure 5), built upon the CECODHAS 2012 data and Padovani’s suggestions:

	<b>Definition</b>	<b>Financial mechanisms</b>	<b>Providers</b>
<b>Subsidized housing</b> ( <i>Edilizia sovvenzionata</i> )	Rental housing owned by the public sector. It is addressed to those with lowest income.	Subsidies cover between 60% and 100% of the cost, and the rents are proportional to the income of the tenant. Rents in the public sector are very low, corresponding on average to ¼ of market rents.	Public sector (municipalities and public housing agencies as former IACPs)
<b>Assisted housing</b> ( <i>Edilizia agevolata</i> )	Housing provided both for rent and for sale and aimed at households on low to middle income.	Subsidies for rental assisted housing between 20 and 60% of the cost and the rent is limited to the minimum price of the	Cooperatives, building firms and all private and public providers engage in the provision of

<sup>5</sup> Decree Law 112/2008 – Law 133/2008, art. 11

<sup>6</sup> The term ‘former’ is used because the Italian public housing agencies, created in 1903 with the name of IACP, have now different names based on regional autonomy. This is the result of a long process of decentralization, namely, since the 1970s (DPR 616/1977), but only and with the constitutional reform of 2001 has been concluded.

		market or the 4.5% of the construction cost. Assisted housing for sale is entitled to between 10 and 30% subsidies and the price of the dwelling may not be higher than that of subsidised housing.	agreed housing.
<b>Agreed housing</b> ( <i>Edilizia convenzionata</i> )	Private housing provided for rent or for sale, whose transfer costs or rents are regulated by a specific agreement drawn up between the Municipality and the housing provider.	Providers benefit from a discount on the local tax for building permission, and a lease on the land for 99 years.	Local authorities in agreement with private housing providers.

**Figure 5:** Types of housing publicly supported in Italy. Source: CECODHAS, 2012: 58; Padovani, in Balchin, 1996.

Therefore, social housing in Italy is actually divided into two sectors, one older (*Edilizia Residenziale Pubblica*) and the other recent (*Alloggio Sociale*), independent from one another, only with some attempts at regional and local integration.

Poggio & Boreiko are of good help to understand social housing in Italy. They argue that social housing in Italy is organized into three parts: i) the traditional public housing (*Edilizia Residenziale Pubblica*), which still holds the greatest weight; ii) the new Integrated Fund System (SIF) based on public-private funding, with the aim of developing the sector at affordable prices for middle-income families, as a result of the National Housing Plan of the Berlusconi government; iii) the emerging non-profit sector. Though, only the last two visions in Italy are called social housing, not mistakenly including the public housing (Poggio & Boreiko, 2017).

For the Portuguese case, the term of social housing appears for the first time in a legislation of 1983<sup>7</sup>, which defines it as housing built and bought with the financial support of the State, through fiscal benefits and financing for acquisition of land, construction and promotion of housing.

Even though the national housing debate was initiated at the end of the nineteenth century, the tradition of social policies of housing in Portugal dates back to 1918, through the construction of the economic houses destined to the lodging of the less well-off families<sup>8</sup> and the derogatory denomination of ‘social neighbourhoods’<sup>9</sup>, which caused a negative perception of those areas continuing even today<sup>10</sup>.

<sup>7</sup> Ordinance n° 580 of 17 May of 1983.

<sup>8</sup> Decree n° 4137, of 25 April 1918 (*Regime das casas económicas unifamiliares para as classes menos abastadas*).

<sup>9</sup> ‘*Bairros sociais*’ appears for the first time in the decree n° 4415, of 28 June 1918, n° 4417 of 22 June 1918.

<sup>10</sup> The main housing policies in Portugal, as well as in Italy, will be displayed in the following section.

The social housing in Portugal is divided in two groups: the first one is public housing, the oldest type, nowadays owned by the IHRU (Institute for Housing and Urban Rehabilitation) or the municipalities, which have the largest part in the country and for this reason is also called municipal housings (*habitação municipal*); and the other one is ‘housing at controlled costs’ (*habitação a custo controlado* - HCC),<sup>11</sup> the most recent type that points out to dwellings “built or acquired with the financial support of the State, which grants fiscal and financial benefits for its promotion, and is intended for the purchasers own and permanent housing or leasing”<sup>12</sup>. In this last case the providers are the municipalities as well as the private social solidarity institutions, housing cooperatives, private companies, that have access to several special lines of financing credit.

One of the providers, the IHRU, not only possesses and directly manages the own stock but it is also responsible for specific financing programs addressing support to acquisition and rehabilitation of dwellings, aiming to an integrated and sustainable vision of housing policy.

In general terms, the social housing in Portugal is able to grant houses to be rented or sold considering families beneath a certain threshold, measures in relation to specific figures and programs addressed for the middle class in the context of public-private partnerships or under municipalities’ initiatives.

In fact, it is important to stress that the cities (and in some cases the metropolitan areas) of Lisbon and Porto have had a privileged position for housing, with specific local programs. Nowadays they still receive a particular consideration, due to the significant raising of the rents, real estate investments, financialization and ‘tourism gentrification’ (Mendes, 2017; Cocola-Gant, 2018)<sup>13</sup>.

Consequently, housing has returned to the centre of attention, even in the political scenario, through the legislative packages recently approved in the ‘New Generation of Housing Policies’<sup>14</sup>, which aims to resolve severe housing problems still presented in the country, to strengthen rehabilitation as well as increasing other housing opportunities, mostly clarifies in the following section.

### **Some data and outcomes on social housing in Italy and in Portugal**

Most comparative housing studies tend to be focused on the composition of the national housing systems (e.g. the types of tenure, weight of public/private/non-profit sectors, quality of the built environment) and the policy approaches adopted. Through this kind of comparison, we recognized similarities between social policies in Portugal and in Italy, mostly due to the still relevant

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<sup>11</sup> Ordinance n° 500, of 21 July of 1987, that replaced the denomination of social housing from the legislation of 1983.

<sup>12</sup> [https://www.portaldahabitacao.pt/pt/portal/programas\\_de\\_financiamento/custoscontrolados.html](https://www.portaldahabitacao.pt/pt/portal/programas_de_financiamento/custoscontrolados.html)

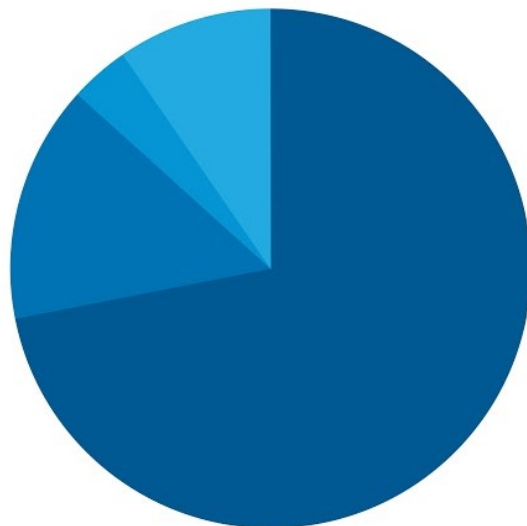
<sup>13</sup> This term wants to explain the phenomenon of the great mass of tourists in the big Portuguese cities that has led to a greater demand for local housing (*Alojamento local* or Airbnb) and reduced the offer of the free market for residents.

<sup>14</sup> *Nova Geração de Políticas de Habitação* (NGPH), Resolution of the Council of Ministers n° 50-A of 2 May 2018.

correlation in the fascist-dictatorial regimes, as previous studies spotted on Spain and Italy (Di Felicianantonio & Aalbers, 2018).

According to Housing Europe (2017), the home ownership in Italy is extremely high, in 2014 was estimated that 71,9% of households were homeowners, 14,8% rented at market rates, while 9,6% lived in a dwelling rent-free and only 3,7% of households were tenants paying a reduced rent. The scenario is not that much different in Portugal which has a large majority of homeowners, at about 74%, the private rent about 17% and the social rent about 2% of the overall housing stock, which is represented by 120.000 units that mainly belong to municipalities. (Housing Europe, 2017). (Figure 6)

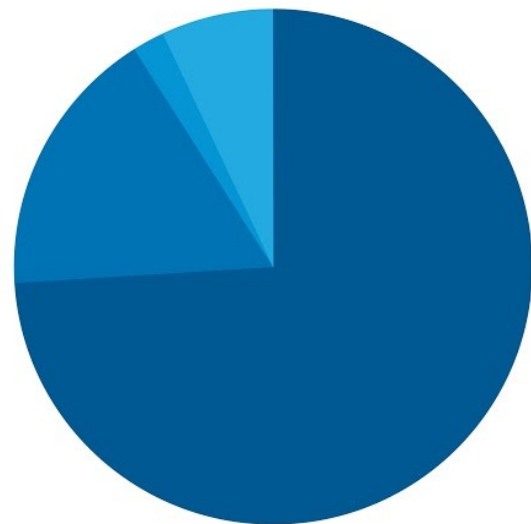
## Italy



**OWNER OCCUPIED 71.9%**  
**PRIVATE RENT 14.8%**  
**SOCIAL RENT 3.7%**  
**OTHER 9.6%**

- Number of dwellings (thousands): 25 783
- Number of dwellings per 1000 inhabitants: 434
- +
- Number of public social housing units: 963 000
- New supply of social housing in 2014: 5 000
- Enhanced measures towards energy refurbishment
- New funding for maintenance and requalification of social housing stock.
- 
- 1.7 million families are at risk of housing exclusion
- Over 400 thousand public housing units are in need of maintenance
- Supply of social housing for the poorest/most vulnerable currently excluded from financial instruments available at local and European level

## Portugal



**OWNER OCCUPIED 74%**  
**PRIVATE RENT 17%**  
**SOCIAL RENT 2%**  
**OTHER 7%**

- Number of dwellings (thousands): 5 926
  - Number of dwellings per 1000 inhabitants: 556
  - Housing Completions in 2012: 7 394
  - Number of social rental dwellings: 120 000
  - Providers: municipalities, to a lesser degree charities and cooperatives
- (Sources: INE, EMF Hypostat, OECD Affordable Housing)

Database)

- +
- New housing strategy focusing on rehabilitation, rental market, housing regeneration
- Initiatives towards affordable rental housing, although still limited in scope
- Lisbon among the first cities in Europe to access EFSI funding for urban renewal, including construction and rehabilitation of social housing
- 
- Legacy of policies historically favoring home ownership with little attention to other tenures (funding, regulation, spatial planning)
- Strong increase in rents in the capital
- Significant increase of housing costs compared to income among the poor and growing arrears on rents/mortgage payments

**Figure 6:** Housing in Italy and in Portugal. Source: Housing Europe, 2017

Therefore, the prevailing pattern of tenure in Portugal and Italy denotes the dominance of owner-occupation and the very small-scale segment of rented sectors. In both cases, owner-occupied housing has been vigorously promoted by government through the provision of subsidies.

This shows the strong orientation of public policies for the development of the owner-occupation. For example, in Italy, grants and loans (in the form of low-interest mortgages) are available to households but also to public authorities and builders. Even the tenants of housing managed by the public housing companies and the municipalities are recipients of subsidies (Balchin, 1996: 158).



In spite of these similar outlines, it becomes crucial analysing several features of social housing separately, each country apart from the other, in order to detect how to compare the outcomes.

The Italian public housing companies own 750 000 units, mainly developed after the Second World War. Nevertheless, that doesn't mean that before that period public housing was inexistent, but the larger share of construction was surely undertaken in the post-reconstruction period.

In spite of that, the most part of the public stock never came to grow significantly due to the privatization of large segments. In order to explain how it was developed, we can briefly divide the history of Italian public housing into seven periods:

- 1) 1903-1937: The IACP (*Instituto Autonomo per le Case Popolari*) was created in 1903<sup>15</sup> as a public body to build and manage the public housing stock; it was not a single organism, but it consisted of several groups that were locally formed at a municipal or provincial level, even though always managed by the central government.
- 2) 1938-1948: In this period an important legislative text<sup>16</sup> was developed on indications for the construction or purchase of public economic houses and the main public actors involved.
- 3) 1949-1963: The Plans *INA-CASA*<sup>17</sup>, a series of laws to develop housing and the employment level of the country, were presented. The state's total investment in public housing was considerable, with the specific goal of encouraging home ownership and indirect public intervention to support private housebuilding. In fact, a total of 800,000 social-rented dwellings were built between 1951 and 1970 and 850,000 dwellings were privatised in the same period (*Ibidem*: 159).
- 4) 1964-1977: Due to the urban growth and the huge urban concentration of workers in the north-west from South of Italy, governments decided to target efforts into localized areas with specific housing problems, rather than expanding the country's overall housing stock. This period was also characterized by the decentralization of administrative functions from the State to the Regions and the IACPs became regional entities<sup>18</sup>. It is interesting to notice that large-scale housebuilding in Italy in the 1960s and 1970s was on a par with that of France and Germany, with approximately 500,000 dwellings being built *per annum*. Rehabilitation began to supplement new housebuilding, accounting for 15% per cent of total

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<sup>15</sup> Luttazzi Law (L. n. 254, 31 May 1903) which takes its name to the deputy (Luigi Luttazzi) who created it.

<sup>16</sup> *Testo unico sull'edilizia economica e popolare*, R.D. n.1165, 28 abril 1938.

<sup>17</sup> Fanfani Law (L. n.43, 28 February 1949) which takes its name to the ministry (Amintore Fanfani). These programs could be divided into two periods: (1949-1956) and (1956-1963).

<sup>18</sup> The law n. 865 of 1971 (*Norme per l'edilizia residenziale pubblica or Legge per la casa*) establishes the transfer of many competencies from State to Regions, legislating about the discipline for assignments and the organization of public entities in the sector of public housing. Lately the Decree of President of Republic n.616 of 1977, especially with the art. 93 comma 3, transferring the functions related to IACP from State to Regions.

housing investment in the 1960s but would increase rapidly in the following decades (*Ibidem*: 155).

- 5) 1978-1992; In the late 1970s there was a shift in housing policies, when the Fair Rent Act and the Ten-Year Plan for Public Act<sup>19</sup> were approved. The year of 1980 marked a turning point (Padovani in Balchin, 1996: 198) because a new scenario was being born: the decline, in opposition of the three previous decades, in the number of new houses built; the drop of withdrawals from the housing stocks; the statistical increase of second homes.
- 6) 1993-2007; This period is designed by rehabilitation policies, mostly called regeneration policies instead of policies to build new social housing. Around the 1990s the share of rehabilitation appointments in the total housing investment had grown to nearly 50%. The Urban regeneration programs also called ‘Complex Programs’ or ‘Integrated Action Programmes’ aimed to organise and co-ordinate initiatives and investments, both public and private in urban regeneration projects. 1993 also marked a turning point due to the law of privatisation of public housing approved to cope with the deterioration of the public stock, whose management was ineffective and expensive. Additionally, the reducing of public funding for construction helped to decrease the social-rented sector even more. The IACPs were transformed in the beginning of 2000s into public agencies with independent legal status, and the decentralization process started at the end of 70s was finally concluded.
- 7) 2008 – now; Due to the approval of the National Housing Plan of 2008, new operators (private and no-profit) were added in the social housing scene, in partnership with Regions and Municipalities. In 2016 a programme for the rehabilitation of the housing stock managed was launched by public housing companies and municipalities. Other measures were launched mostly to promote energy regeneration of public housing with incentives and tax reliefs covering up to 75% of the cost of interventions (Housing Europe, 2017).

The historical framework of social housing in Portugal is different, due primarily to the fact that it had a dictatorship until 1974; did not participate in the Second World War; and to the arrival of a significant number of immigrants, mainly of the formers colonies in Africa, with the beginning of democracy in the country. According to Pinto (2017), “the Portuguese welfare system was mainly emerged out with the democratic revolution” (1974), as a response to the rapid urbanization of the country and to the growth of illegal settlements in the outskirts of large cities.

We briefly divide the historical framework of the Portuguese public housing into six periods:

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<sup>19</sup> This was a really ambitious plan because it wanted to build a big amount of houses every 10 years.

- 1) 1910-1933: the period of the 1<sup>st</sup> Republic, until 1926, was characterized by the first housing programs, instead the remaining years, during the Military dictatorship, represented a period of transition when almost nothing was done concerning housing policies.
- 2) 1933-1974: In the period of the authoritarian regime of Salazar (*Estado Novo*) Portugal developed ‘an ideologically central and aggregating policy’ (Baptista, 1999), which could be synthesized in three directions: i) direct and centralized promotion in collaboration with municipalities; ii) inclusion of the institutions of social policy; iii) integration of the private entities involving the transfer of decision-making powers to third parties (Antunes, 2017).
- 3) 1974-1987 (Early Democratic regime): After the carnation revolution, housing policies in Portugal were focused on: freezing of rents and the binding nature of lease agreements; financial incapacity of the proprietors due to low income, contributed to the physical degradation of the housing stock; defining social housing programs for the many impoverished people (which resulted in PIMP e later in PER) and wide governmental subsidies through several mortgage credit. A brief but significant policy, later approached as a case study by many researchers, was the SAAL<sup>20</sup> (1974-1976), an innovative and successful example that gathered technical choices and community participation (Bandeirinha, 2007).
- 4) 1987-2007: This period was represented by two lines. Firstly, the public programs (PIMP and PER<sup>21</sup>) to cope with the scarcity of housing and to “eradicate” (as the Law promotes) neighbourhoods of shacks or illegal dwellings. Mostly the PER has been discussed as a controversial policy (Guerra, 1994; Pinto, 1994; Cachado, 2013) which “has had a changing role starting as a financial instrument to a core component of policies of urban regeneration” (Tulumello *et al.*, 2018). On the other hand, the policies of government subsidies were increasing. In 25 years, from 1987 to 2011, over 73,3% of public funding in the field of housing consisted of credit interest subsidies for people building on buying a home, supporting 9,6 million euros to lost fund (IHRU, 2015). The 90s are also characterized by the transfer of a huge part of the public housing stock from the IGAPHE (ex IHRU) to the municipalities, which explains why Portugal is distinguished by the high weight of social housing on municipal property (Pato & Pereira, 2013).

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<sup>20</sup> *Serviço de Apoio Ambulatório Local* (SAAL) lasted a bit more than two years, from July 1974 to October 1976, which corresponds to the In Course Revolutionary Program, known as PREC (*Programa Revolucionário em Curso*) which launched a group of policies: cultural (Almeida, 2009), educational (Oliveira, 2004), health, and housing (Bandeirinha, 2017).

<sup>21</sup> The PIMP (*Programa de Intervenção a Medio Prazo*) was established on 11 June of 1987 through a Memorandum of Understanding with the Municipality of Lisbon and the Secretary of the State for Housing and so was implemented only for the Lisbon Municipality. The PER (*Programa Especial de Realojamento*) was approved by Decree Law n° 163 of 7 May 2003 (last alteration with the Decree Law n° 271 of 28 October 2003) and implemented in the Metropolitan Areas of Lisbon and Porto.

- 5) 2008- 2013: In general, this is a period characterized by the scarcity of housing policies, due to the crisis and the Troika governments, established from 2011. The only little change was coming from the programs of IHRU, planned to make the rental market more accessible. The first one, the Social Rent Market (*Mercado Social de Arrendamento*), established in 2012, permits renting at a price 30% below the regular market price and, the second one, Rehabilitate for Rent (*Reabilitar para Arrendar*), provides municipalities, companies and societies to rehabilitate buildings for use as rental housing with regulated rents. The private rental market, stuck for many years during the authoritarian regime and the following decades, was totally restructured in 2012 with reforms of rental regulation which have permitted incentives for renovation but also hastening extrajudicial eviction procedures. Hence, in 2012, a reform of the rental market in Portugal allowed more flexibility, offered incentives for rehabilitation but also provided a new and speedy extra-judicial formula for eviction.
- 6) 2014-now: Within economic crisis and austerity policies, Portugal started to receive an increasingly and attractive interest from foreign investors, while banks have substantially reduced strategic facilities to help people to purchasing a home (Pinto, 2017). Recently, free market rents are increasing sharply, also due to the expansion of the tourist accommodation, short term rents and Airbnb's phenomenon. These trends resulted in the intensification of social housing's requests, indeed in 2015, 19.800 applications for social housing were registered, more than a half in the Lisbon metropolitan area (INE, 2016). A national housing strategy (2015) presents three lines to follow until 2031: i) encourage urban rehabilitation; ii) increase the rental market; iii) to improve the regeneration of housing (Housing Europe, 2017). In 2018 started a New Generation of Housing Policy (*NGPH*)<sup>22</sup> with a legislative package focused into two lines: Ensure everyone's access to adequate housing, understood in the broad sense of habitat and geared to the people, through a significant extension of the scope of beneficiaries and the size of the housing stock with public support; To create the conditions so that both the rehabilitation of the building and the urban rehabilitation go from exception to rule and become the predominant forms of intervention, both in terms of buildings and urban areas.

As we can notice above, in Italy there are Private Social Housing Real Estate Funds, that is emerging recently as a new type of provider for rent or sale houses at affordable costs. Some non-

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<sup>22</sup> Approved with Resolution of the Council of Ministers n. 50-A of 2 May 2018.

profit organizations are also active, but projects are mostly small in size and concentrated in few regions of the country. In Portugal, until now, the role of private actors doesn't exist to provide social housing and the non-profit organizations are little relevant in number. Therefore, the only difference about the types of social housing providers in Italy and in Portugal is the private for-profit (Figure 7):

Country	Type of provider(s)					
	Central government	Local authority	Independent public body/publicly owned company	Co-operative	Other private non-profit	Private for-profit
ITALY		X	X	X	X	X
PORTUGAL		X	X	X	X	

**Figure 7:** Types of social housing providers. Source: Housing Europe, 2017.

The historical-political framework of the country and the determination and development of the social state also show the main features about the age of the housing stock.

In most EU Member States, including Italy, more than half of the entire national public stock was built during the post-war period, between 1946 and 1980, due to the development of the welfare state or social state, especially in countries affected by second World War.

On the contrary, Portugal saw a period of huge urbanization in the following decades identified by the fact that in the Lisbon Metropolitan area 60% of the actual buildings were built after 1980 and 24% after 2000 (Pinto and Guerra, 2013), thus representing a younger housing stock in Portugal than in Italy.

Besides, the system of public housing funding is a bit different in the two countries but with the same result. In Italy, the Regions are the main actor that provide the funding for the public sector, the municipalities co-finance personal aids for the rental sector or allocate land to providers and the central government co-finance projects through housing allowances or programmes to support social rental housing or to rehabilitate (Federcasa, 2015).

In Portugal, the intermediate level – as Italian Regions – is being politically discussed since the 1980s (“*Regionalização*”) but doesn't exist, so the main funding comes from the central government even if the municipalities are the main providers and managers of the social housing,

since the mid-1990s, when a large part of the national public housing stock was transferred to the individual municipalities<sup>23</sup>.

Nevertheless, both in Portugal and in Italy, ‘an insufficient level of public support in the field of housing combined with low rents, which often do not cover the costs of construction or maintenance, makes the current system of financing social housing rather unsustainable’ and with ‘an increasing risk of collapse’ (CECODHAS, 2012: 58).

As briefly shown, the similarities and differences on social housing between the two countries are considerable. The present article does not set out to be exhaustive but to adopt a different approach to read the issue and launch some reflections that will be deepened later. In fact, an in-depth discussion, in which the data and characteristics of each country are compared, is currently underway in the PhD research.

### **Conclusive remarks**

This working paper represents the starting point of the research project which aims to examine some case studies in Portugal and Italy with integrated interventions in social housing neighbourhoods.

Anyhow, what emerges from this research is a basis composed with some reflections to be further explored. The study has already displayed some similarities on the area but simultaneously has revealed differences found while comparing each country’s statistical data and historical framework.

The topic of social housing, presented throughout the cultural model, political decisions and administrative management, reveals the first differences in terms of welfare regime, historical periods, systems of funding, age of the housing stock, types of providers and so on.

On the other hand, the main similarities among the countries is the huge support of the governments to the acquisition of home ownership during the last decades and the stigmatized perception of the public housing and a prejudiced definition of the targeted model of the inhabitants who use them.

Reflecting on this, we can notice that the political paradigm seems to be changing in the two countries, even if evolving with small steps and often in localized areas. Maybe if we start to analyze and recognize these limited but positive experiences it could lead to the development of initiatives at a larger scale. This kind of comparative exercise allows to look beyond low statistical numbers of the social housing, showing a more complex scenario, enabling the understanding of

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<sup>23</sup> Today, the public housing stock can be of the IHRU - *Instituto de Habitação e da Reabilitação Urbana* - or of the individual municipalities. The transition to the municipalities occurred when IGAPHE and INH, the two main institutions of the dwellings were merged to be created the IHRU- *Instituto de Habitação e da Reabilitação Urbana*.

several features in single countries, and finally developing a theoretical research based on ‘learning from the South’.

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### **Website list**

<https://ec.europa.eu/eurostat/>

[www.housingeurope.eu](http://www.housingeurope.eu)

<http://www.oecd.org/social/affordable-housing-database.htm>

<https://www.portaldahabitacao.pt/pt/portal/index.jsp>