

Immigrant integration in ITI/SUD strategies: The case of Athens, Greece

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Abstract

Foreign immigration from low-income countries to the Athens Functional Urban Area (FUA), started in earnest in the early 1990s. However, the first integrated territorial development instrument which covers immigrant integration (the Integrated Territorial Investments-ITI), was introduced in the mid-2010s as a result of adopting relevant EU Regulations.

In the Programming Period 2014-2020 there were 4 ITIs approved for funding in Athens FUA. They focus on innovation, economic growth and social cohesion but rarely mention immigrants and refugees per se. The paper argues that this approach, followed by all four Strategies, is a rather generic feature of the country's governance modalities, in an ongoing process of Europeanization.

The paper explores the rationale behind the way ITIs were implemented in Athens' FUA, and offers insights as to how immigrant issues could be further mainstreamed in Sustainable Urban Development strategies in the future.

Keywords

Immigration,
Sustainable Urban
Development
strategies,
Integrated
Territorial
Investments, Athens

Introduction

The Athens Functional Urban Area (FUA) has around 35% of the population of Greece. More than 50% of the country's economic activity and approximately 50% of the immigrant population are concentrated there. The 2011 census showed that the population remained at the same level as in 2001, at 3.8 million people. Preliminary census data for 2021 does not show any major changes in that picture.

Athens' urban development is typical of Southern European urbanisation (Allen et al., 2004) and has low levels of social and ethnic segregation, compared to Western European cities (Maloutas, 2007). However, lower income strata -which include many foreign immigrants- do experience multiple deprivation in Southern European cities and in Athens (Arbaci, 2019; Karadimitriou et. al., 2021).

Greece experienced massive foreign migration from Eastern Europe in the early 1990s. As a result, currently, more than 50% of foreign immigrants in Greece, and in the Athens FUA, are from Albania. Approximately 1% of Athens FUA population in 1991 were immigrants from

low Human Development Index countries but that number reached almost 10% in 2001 and remained at that level in 2011. The percentage of immigrants from high HDI countries remained around 1% throughout that period.

In the 2000s the inflow of migrants was smaller but migration from countries of the broader Middle East increased (Kandylis et al, 2012). Although immigration issues have been of prominent concern ever since, the policy response has been slow, especially regarding integration. Central government maintained its prominent role in dealing with immigration issues whereas regional or municipal competencies remained limited. The issues caused by the sudden influx of over 1 million Middle Eastern and Central Asian immigrants and refugees, required the involvement of local government in order to be tackled more effectively. EU administrative support and resources as well as UN and international NGO know-how were also required to deal with this emergency.

This paper looks at whether and how the application in Greece of Sustainable Urban Development provisions (Article 7, Regulation (EU) 1301/2013 and Article 36, Regulation (EU) 1303/2013) addresses the integration of immigrants and refugees in Athens FUA in relation to the Greek policy context. These two regulations set out the scope and remit of the European Regional Development Fund (Regulation 1301) and lay down common provisions for the European Structural and Investment Funds (Regulation 1303). Integrated Territorial Investments (ITIs) are a funding mechanism for the development of integrated strategies for specific regions or territories. ITIs aim to bring together a range of stakeholders from different sectors and levels of governance to design and implement a coordinated approach to territorial development. They are a way to combine a multitude of funding and financing sources into a coherent investment programme. ITIs are typically funded via a combination of European Regional Development Fund (ERDF) funds, other EU, regional, national and local authority funding sources as well as European Investment Bank loans, commercial bank loans etc. In particular, the chapter discusses four Sustainable Urban Development (SUD) strategies implemented as Integrated Territorial Investments (ITIs) during the 2014-2020 programming period (see Section 5 for a detailed description).

The argument in this paper is that the ITI/SUD that were implemented in Athens included initiatives of relevance and of potential benefit to immigrants. They mostly targeted areas facing increased deprivation and immigrant concentration. However, immigrant integration was not an explicit goal of any ITI/SUD due to the 'immigration-blind' strategic policy inputs to the SUD strategies. The language barrier was also a significant issue when it came to participation in the ITI/SUD drafting process and to accessing relevant programmes.

After the introduction, Section 2 discusses the changes taking place in the Greek policy landscape within the context of Europeanization of territorial cohesion as well as immigrant integration policy. Section 3 provides a detailed description of the methodology while Section 4 describes the phenomenon of migration in the Athens FUA and presents the main actors

involved in immigration policy in Greece. Section 5 presents the key characteristics of the areas covered by ITI/SUD in the Athens FUA, while Section 6 analyses the substance and content of the strategies in relation to immigrant integration. Finally, Section 7 provides a discussion of the findings and offers conclusions and recommendations for the implementation of the next round of ITI/SUD.

Europeanization, and policy transfer on immigrant integration and territorial development

Europeanization

As the introduction already pointed out, immigrant integration as well as integrated territorial development are concepts which were imported into the Greek policy landscape. Changes in both policy areas, as well as the explicit policy-oriented approach itself, can be viewed as episodes in the continuous process of ‘Europeanization’ (Ladrech, 1994) of the Greek policy landscape (Kazakos, 2004) which is often structured around implicit policy modalities.

Radaelli (2003, p.30) defines Europeanization as a: *“Processes of (a) construction, (b) diffusion, and (c) institutionalisation of formal and informal rules, procedures, policy paradigms, styles, ‘ways of doing things’, and shared beliefs and norms which are first defined and consolidated in the making of EU public policy and politics and then incorporated in the logic of domestic discourse, identities, political structures, and public policies.”*

This is a process with multiple top-down and bottom-up feedback loops, which does not evolve in a uniform way across policy areas but even affects policy areas where Greece retains a substantial level of control (such as welfare policy and migrant integration) (Sotiropoulos, 2004). Having said that, economic, social and territorial cohesion as well as asylum and immigration, are policy areas where the EU is actively involved in.

Radaelli (2000), argues that European institutions stimulate policy transfer by triggering and speeding up isomorphic processes (ie processes whereby nation-states are becoming more alike to each other). In both policy areas, there is such a process at play insofar as the transformation of the Greek policy and institutional landscape is concerned. Greece is often on the receiving end of this processes of construction, diffusion and institutionalisation. Alignment of Greek policies and implementation mechanisms in the areas of territorial development, asylum and immigration is progressing reasonably quickly given the obligation to adopt EU regulations in Greek legislation, and the substantial funding allocated to support the implementation of said regulations.

Integration and territorial cohesion policy in the EU and Greece

The Integrated Territorial Investments were first introduced with Regulation (EU) 1303/2013 and 1301/2013 (see the introduction to this paper). However, the idea of integration as a benchmark for EU territorial cohesion policy can already be found in the 2007 Leipzig charter on Sustainable European Cities. Having said that, integrated place-based interventions were a key concept in Urban Pilot Projects (URBAN I and II) funded under Article 10 of ERDF since 1989, whereas some form of integrated urban development has been practiced in European countries such as Germany or the Netherlands at least since the 1980s.

In Greece, Integrated Urban Intervention Plans (IUIP; in Greek: ΣΟΑΠ) were introduced in Law 2508/97, which systematized principles, institutions, procedures and instruments for sustainable urban development. However, the law made no provisions for a funding regime to support IUIPs and this instrument remained idle probably for that reason. The IUIP specifications were published by the Ministry of the Environment in 2012 and the first such plans were drafted in 2015. In parallel to this, Integrated Urban Development Plans and Programmes (IUDP) were drafted and implemented using the European Structural and Investment Funds (ESIF) Regional Operational Programmes (ROP), following up from URBAN I and II. Eventually, these two parallel pathways merged, when the statutory plans (the IUIPs) were used as inputs for the Sustainable Urban Development strategies drafted in order to attract the EU funding available under Article 7 of Regulation (EU) 1301/2013. The first ITI/SUD in Greece were drafted in 2016-2017 (Asprogerakas, 2020).

Immigration policy in Greece

Insofar as immigration is concerned, the first National Strategy for the Integration of Third Country Nationals in Greece was drafted in 2013, and in 2018/19 the Government also adopted the National Integration Strategy (NIS). These policy documents, and especially the NIS, set out a national integration approach which is based on what the strategy refers to as the “social integration” model (mirroring the EU approach which focuses on inclusion in labour markets as well as in housing, health and education provision). The NIS also stipulates that local authorities and civic society/NGOs should play a prominent role in the NIS delivery.

Solano and Ponzo’s analysis (2022) shows that when compared to the EU-15 average, Greece’s policy approach is on the restrictive side when it comes to naturalisation and political representation, but more permissive when it comes to labour market access and family reunification. Third country nationals legally residing in the country enjoy basic rights and have unhindered access (but not positive discrimination or special supportive measures) to compulsory education, health, housing and labour markets. The country only has a rather limited-scale integration programme for beneficiaries of international protection and there is no national integration programme explicitly targeting immigrants, which adversely affected the scoring in Solano and Ponzo’s analysis.

This approach towards immigrant integration has remained remarkably stable at least since 2010 (Solano and Ponzio, 2022). In similar fashion to much of Southern Europe, there was not a significant influence on this policy approach from far-right political parties which in any case remained limited in their overall political influence (Finotelli and Ponzio, 2018). In fact, the NIS was drafted under a left-wing government and was subsequently taken on by a centre-right government. Further on, there seems to be a cross-party consensus on policies to attract highly skilled immigrants such as ‘Digital Nomads’ or immigrants who can invest in the country via a very successful ‘Golden Visa’ scheme.

The cross-party consensus extended to the positive treatment of Ukrainian war refugees and on policies to import low-skilled labour from non-EU countries to cover seasonal shortages in agriculture and tourism. In 2022, the Greek parliament almost unanimously ratified agreements with Egypt and Bangladesh to allow seasonal workers from those two countries to work in Greece legally. Overall, Greece has granted 168 000 such permits for non-EU nationals for the years 2023 and 2024.

Methodology

The analysis in this paper is based on a mixed methods approach drawing on primary qualitative and secondary quantitative data. Secondary quantitative data came from the 1991, 2001 and 2011 censuses, whereas primary qualitative data came from interviews and documentary analysis.

The source of the quantitative data is the detailed dataset of the censuses of the Greek Statistical Authority (ELSTAT), retrieved from the online application ‘Panorama of Greek Census Data 1991-2011’ (www.panorama.statistics.gr/en). Currently, population data from the 2021 census are only available at aggregate level (Municipality) and immigrant population data for 2021 are not available at disaggregate level either (ie at Urban Analysis Unit -URANU-level). Detailed up to date population data from Municipal Registers is also not available because such information is not collected. We also used the Deprivation Index (DI) introduced by Karadimitriou et al (2021), which comprises several variables related to employment, education, and housing, all directly corresponding to policy areas which the social integration model emphasises. The index is the sum of the values of said variables, standardised within and among the three sectors.

In addition to the quantitative data, seven semi-structured interviews were conducted in early 2021. Four of these were with Intermediate Body (IB) senior staff who are tasked with the implementation of the ITIs (one for each ITI), one with a mid-level manager working in immigrant and refugee integration initiatives in Athens, one with a senior expert involved in the drafting of one of the ITI/SUD strategies, and one with a senior municipal political staff involved in the drafting and delivery of one of the strategies. We were referred to the interviewees by IB senior management after we explained to them the purpose of our inquiry.

The interviews covered the strategy content, the strategy priorities, immigrant inclusion in the strategies and the treatment of migration by relevant policy-makers. Additional information on the strategy implementation, and especially on the content of calls, were obtained by sending a targeted request to two additional technical staff tasked with ITI implementation in two IBs. Finally, one independent academic expert who specialized on immigration and asylum issues was consulted in order to complement our knowledge regarding data availability on immigration in Athens.

Finally, other than national policy documents and regional level strategies, the documents of the SUD strategies, and the information available on the IB websites (calls for proposals, etc.) were analysed in order to ascertain the vision, focus and direction for each SUD strategy and the actual way these were implemented.

Immigrant presence and relevant actors and institutions

Immigrant presence in the Athens' FUA

The census data shows that in 1991 immigrant population in the Athens FUA was 82 000, of whom 26 000 lived in the city centre (Municipality of Athens - MoA). Their number increased to 368 000 in 2001 (147 000 in MoA) and to 399 000 in 2011 (151 000 in MoA). In 1991 the number of immigrants originating from middle and high HDI countries was slightly higher than those from low HDI countries. In 2011 the percentage of immigrants from middle and high HDI countries in the total population remained the same as in 1991, but the percentage of immigrants from low HDI countries went up 10-fold. In the Municipality of Athens in 2011 approximately 21% of the population were immigrants from low HDI countries (Table 1).

Nationality	1991 (#)	1991 (%)	2001 (#)	2001 (%)	2011 (#)	2011 (%)
<i>Municipality of Athens</i>						
High HDI country	10 106	1.22	17 832	2.24	12 569	1.90
Low HDI country	15 767	1.90	128 800	16.16	138 017	20.82
<i>Athens FUA</i>						
High HDI country	42 911	1.19	45 085	1.16	39 858	1.05
Low HDI country	38 351	1.06	322 818	8.27	358 741	9.46

Table 1 - Immigrant population in the FUA of Athens and in the Municipality of Athens as % of total population, by country of origin HDI group ⁽¹⁾ (1991, 2001, 2011). Source: EKKE-ELSTAT, 2015.

¹ Countries of origin have been categorised in accordance with the UN Human Development Index (HDI) (http://www.undp.org/content/undp/en/home/librarypage/hdr/human_developmentreport2011.html).

The relative and absolute increase of the immigrant population in the city centre is due to their growing numbers as well as the decreasing presence of Greek nationals who have been leaving the city centre since the late 1970s (about 300 000 moved to the suburbs between 1991 and 2011). Maloutas (2014) argues that suburbanisation in Athens is an outcome of a combination of rising incomes and declining quality of life in the city centre following the rapid densification of the 1960s and 1970s, and the boom in car ownership in the 1980s and 1990s. As mentioned in the introduction, the FUA population remained almost stable during the period 2001-2021.

The incoming migrants mostly moved into apartments in the lower floors of the Athenian apartment blocks, which are smaller and offer less amenity value. Therefore, vertical social segregation in the housing stock of the city centre increased (Leontidou, 1990; Maloutas and Karadimitriou, 2001). Counter-intuitively, the presence of immigrants decreased in the working-class areas of Western Athens, because of the limited stock available in the private rental market there (Leontidou 1990, Emmanuel 2004). The result of those trends was that the social mix in the city increased during the period under examination. However, as Arbaci (2019) notes, social mix is not a sufficient condition for immigrant integration.

Actors and institutions dealing with migration in Greece

Although the first law which introduced the concept of immigrant integration was passed by parliament in 2005 (Law 3386) the emphasis of the Greek government still is on identification and reception, which became an acute issue in 2015 and for which there is significant EU regulatory activity and funding. The first National Integration Strategy for immigrants was drafted in 2013 largely as a response to the EU requirement for member-states to have such a document in place in order to access EU funding.

Integration of immigrants is a comparatively lower priority for Greek policy-makers, although the effects of the most recent European Commission Action Plan (European Union, 2020) still have to be seen. The Immigration and Social Integration Code (Law 4251/2014) was a significant step towards the rationalisation and simplification of the system, and establishes clearly some basic rights for immigrants, especially when it comes to labour market access (see Bagavos et. al. 2021). Law 4375/2016 which otherwise deals with asylum issues, also established a Directorate for Social Inclusion whose aim is to support the administration in its relevant efforts.

The latest version of the NIS was published in July 2019. As already mentioned in the introduction, the NIS outlines the ‘Greek integration model’, based on the principles of the social integration model. It explicitly distances itself from approaches based on assimilation or multiculturalism and assigns to local authorities a prominent role in delivery. It is a general guidance framework without legal status, and it is not complemented by an action plan or a

funding mechanism. Therefore, it is not compulsory for central government and local authorities to take it into account.

The Ministry of Migration and Asylum (MMA) has been a key government actor since 2016 (it was called Ministry of Migration Policy at the time). Other central government bodies that get involved in migration issues are the Ministry of Citizen Protection, the Ministry of Defence, the Interior Ministry/Home Office². Other than the prominent role of DG HOME in influencing national policy and in programme funding, the most visibly engaged EU agency is FRONTEX. Finally, local authorities are also involved in immigrant integration directly and indirectly. They do not have much jurisdiction over immigration and asylum other than the delivery of some basic services, for which they receive limited funding. As a result, many local authorities do not see immigrant integration as something they should be heavily involved in and to which they should allocate resources to (Interviewee 6). Local authority competence in terms of immigrant integration extends to offering temporary accommodation, language training, primary healthcare and social assistance. Indirectly, however, they do get further involved in immigrant integration issues because they are delivering services in primary and secondary education, primary care and have a legal obligation to offer care services for the elderly, the uninsured, vulnerable groups etc.

Many local authorities operate Immigrant Integration Centres (in Greek: KEM) offering advice and support. As a result, local authorities sometimes offer initiatives that provide adult language skills and orientation courses, primary healthcare or temporary shelter. Having said that, the Cities Network for Integration (CNI), set up by the Municipality of Athens, has less than 20 local authority members. Finally, local authorities are legally obliged to operate Immigrant and Refugee Integration Boards (in Greek: ΣΕΜΙΙ). These are advisory bodies which bring together the local administration and civic society (potentially including immigrant representatives), with a view to advising local decision-makers on issues related to immigrant and refugee integration. The Municipal Council for Immigrant Integration is the main body representing the voice of local authorities on relevant policy issues.

The International Organization for Migration (IOM) and the United Nations High Commission for Refugees (UNHCR), as well as various NGOs, play an important role in service delivery and provide policy inputs. At the time this research was carried out, there was one national programme aimed at integration, the Hellenic Integration Support for Beneficiaries of International Protection (HELIOS). This was managed by the IOM and initially funded by DG HOME, then by the MMA.

² The Ministries of Health, Education, and Work and Social Affairs also get involved in matters of their competence.

The case study areas and their ITI/SUD strategies

Case study areas

The areas of the FUA targeted by the ITI/SUD are:

- A) An area in the Municipality of Athens as well as small urban quarters neighbouring it, in the Municipalities of Nea Smyrni and of Moschato-Tavros;
- B) The Municipality of Piraeus;
- C) An area spanning across several municipalities of Athens' Southern Sector (Municipalities of Kallithea, Palaio Faliro and Alimos);
- D) Areas in seven municipalities of Athens' Western Sector, later increased to eight municipalities, where each municipality has one or more areas of activity.

These areas, marked A, B, C, D in Figures 1-3, are very diverse in terms of deprivation index scores (Figure 1) and immigrant presence (Figures 2 and 3).

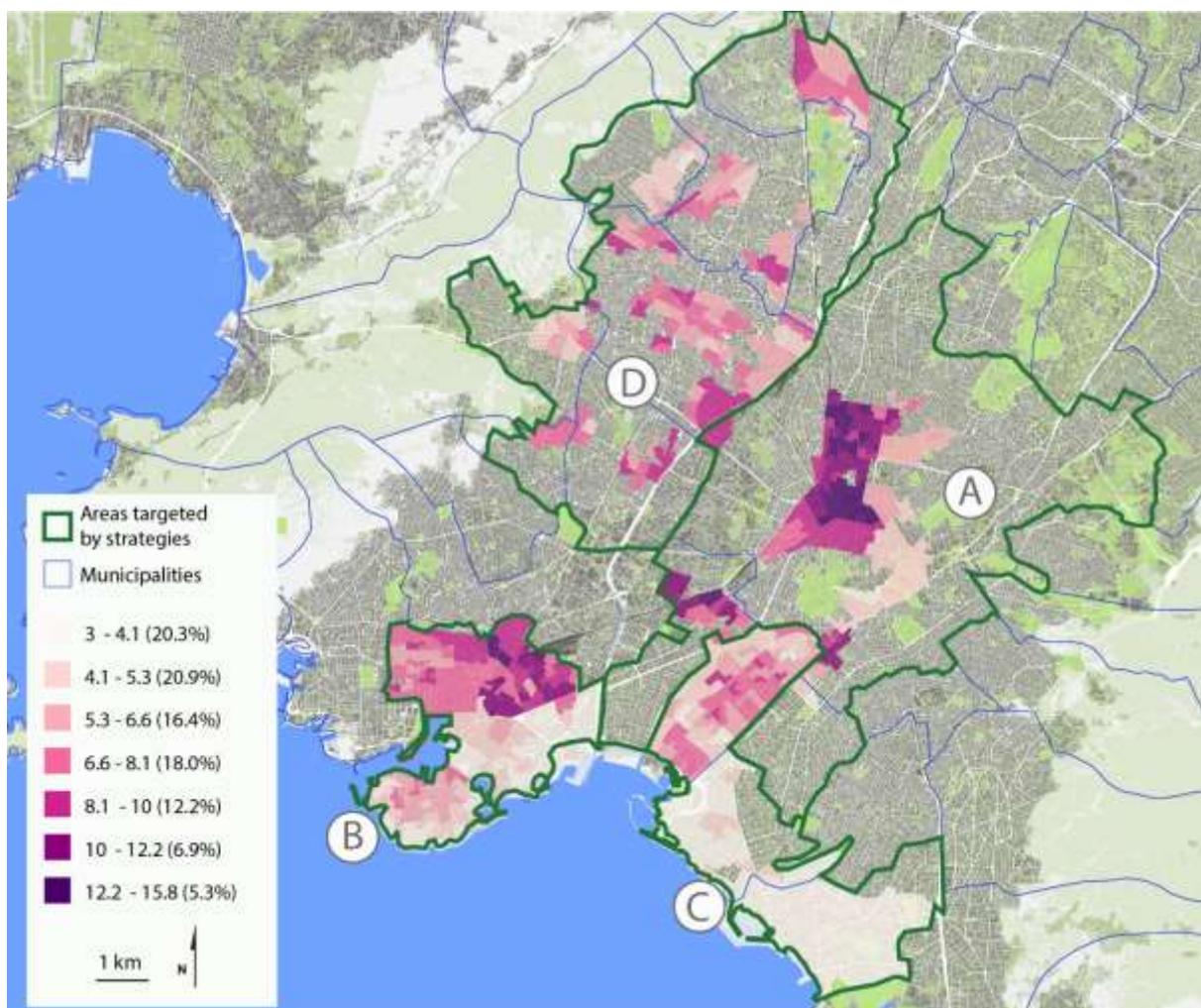


Figure 1: Deprivation index scores in the areas initially targeted by ITI/SUD (2011 data). Percentage of URANUS in each category is shown in brackets. Data source: EKKE-ELSTAT (2015)

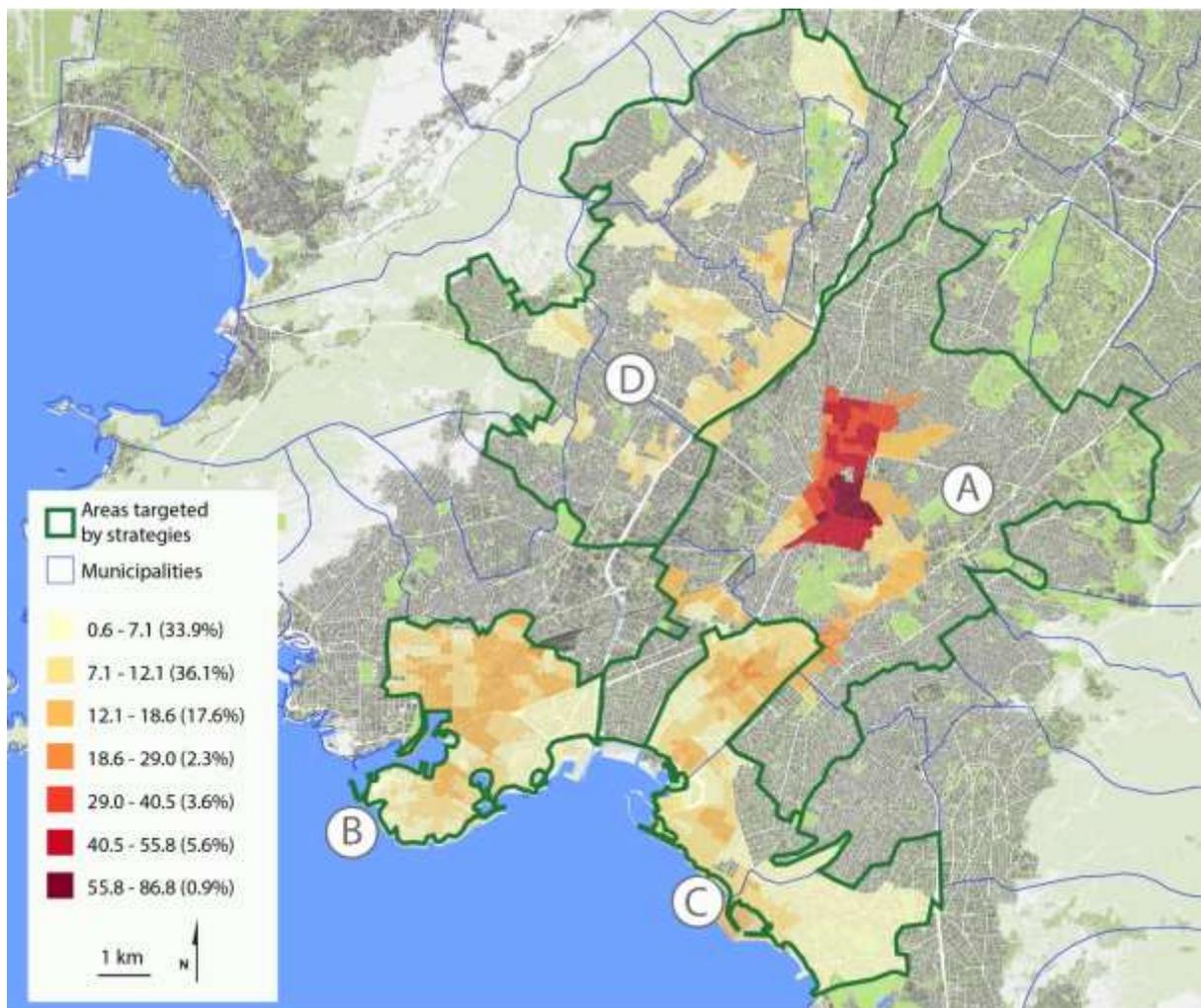


Figure 2: Percentage of immigrants in the areas initially targeted by ITI/SUD (2011 data). Percentage of URANUs in each category is shown in brackets. Data source: EKKE-ELSTAT (2015)

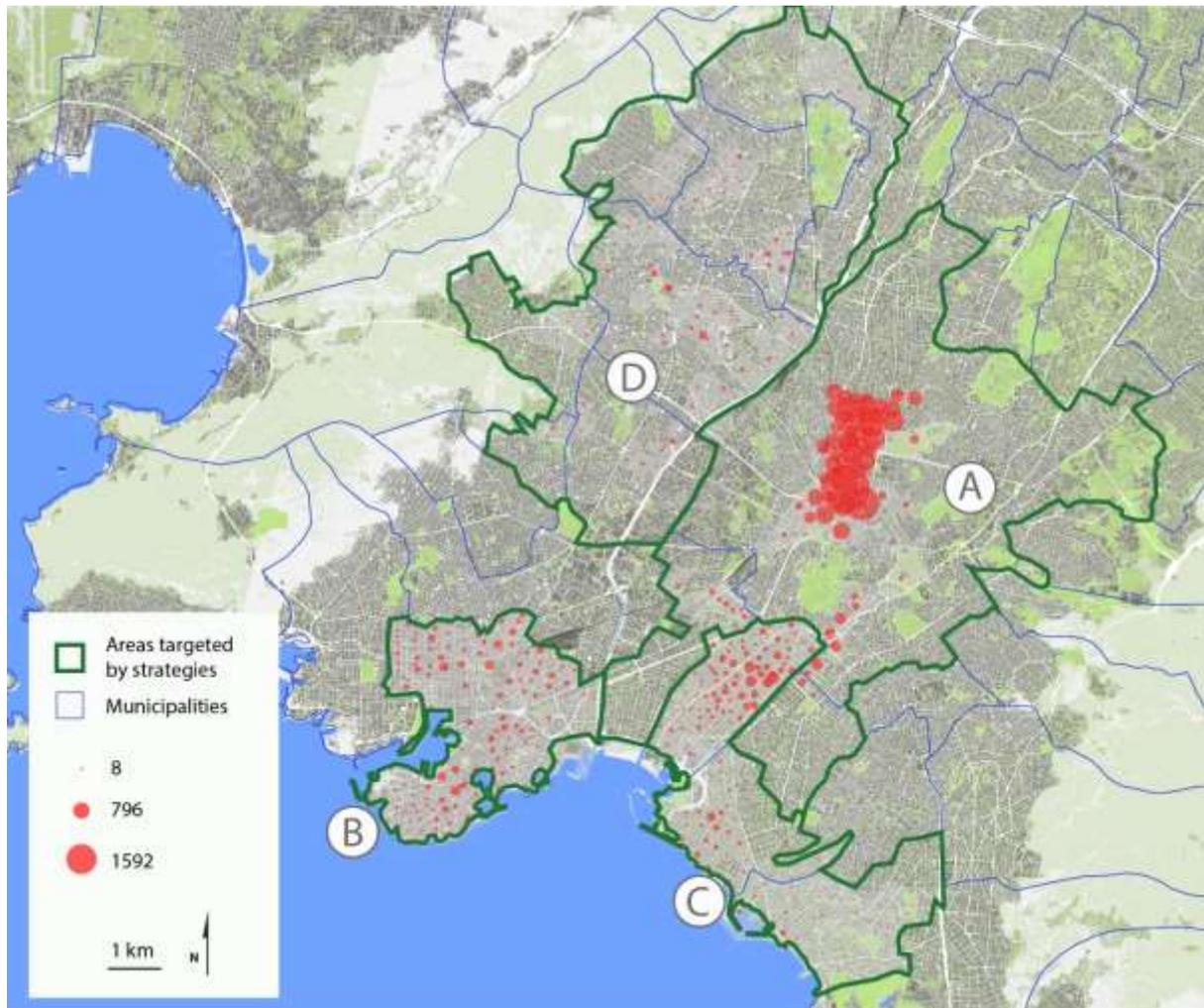


Figure 3: Immigrant populations in the areas initially targeted by ITI/SUD, in absolute numbers (2011 data). Data source: EKKE-ELSTAT (2015)

According to Figure 1, in a large part of the Athens area of ITI activity the population faces higher than average deprivation levels³. Most areas targeted in the Western Sector face average deprivation levels. The picture in Piraeus and the Southern Sector is more mixed; in some areas the population has lower than average levels of deprivation but in some others the level of deprivation is higher than average.

Municipality of Athens and the city centre

The Municipality of Athens is a socially, demographically and ethnically mixed municipality. Broadly speaking, upper and middle-income neighbourhoods are located in the centre-east whereas lower income neighbourhoods are in the centre-west. High immigrant concentration combined with high deprivation scores can be found in central and north-western neighbourhoods (Figures 1,2,3). The area targeted by the ITI/SUD covers densely

³ Deprivation index scores at the level of micro-areas (census tract level) were calculated by the authors using several variables related to employment, education and housing. The scores of each micro-area were eventually combined to the score of an integrated deprivation index (Karadimitriou et al., 2021).

built up, socio-economically declining middle-class neighbourhoods where the largest percentages and the highest numbers of immigrants are concentrated.

Municipality of Piraeus

The Municipality of Piraeus is home to the biggest port in Greece and one of the biggest in Europe, but also has a declining industrial area of significant size. It has become a major international maritime transport hub. The ITI covers the entire municipality and comprises areas of higher than average deprivation towards the north-east and north-west, and less deprived areas in the centre and close to the seafront. It has not attracted significant numbers of immigrants since the 1990s, probably due to the mostly owner-occupied housing stock, which offers limited vacancies.

The Southern Sector

The Southern Sector ITI focuses on an area located along the coast and close to the Athens city centre. The Municipality of Kallithea, to the south-west of the Municipality of Athens has gone through a period of relative socio-economic decline as the middle class left to the suburbs. There are areas, akin to enclaves, where recent migrants and some refugees have moved in, but overall it has not attracted immigrant populations to the extent that Athens city centre has. The Municipality of Palaio Faliro and part of the Municipality of Alimos, are densely built up but with better planning standards and therefore more expensive in terms of housing. They have not attracted significant numbers of immigrants, other than Istanbul Greeks who were expelled or had to leave the city in the 1950s and 1960s. In marked difference to the other three strategies, which were targeting 'deprived areas', the Southern Sector's strategy covers an area with 'special development dynamics'. Both types of territory were allowed to submit their strategies under the MA call criteria.

The Western Sector

The Western Sector is a working-class area, developed in the early post-WWII period. This area is densely built up with low planning standards but the housing stock mostly comprises single-family dwellings. Self-development and sometimes illegal/unauthorised construction were the dominant modalities of housing provision in the area. Deprivation in the Western Sector has dropped since the 1990s (Karadimitriou et al. 2021; Arapoglou et al, 2021). This change is due to inter-generational social mobility of local households whereby the upwardly mobile remain resident in the area (Maloutas, 2004). The percentage of immigrants in the Western Sector is below the average for the FUA of Athens. This is because most of the housing stock is self-developed before the period of immigrant inflow, currently owner-occupied and, therefore, it is structurally difficult for immigrants to enter this market.

ITI/SUD case study analysis

The analysis covers four ITI/SUD:

1. “Athens 2020: sustainable development for tourism, culture and innovation”, submitted by the Municipality of Athens.
2. “ITI for the sustainable urban development of Piraeus”, submitted by the Municipality of Piraeus.
3. “The music and history of the streets”, submitted by an ad-hoc group of three Southern Sector municipalities which later formed the Municipal Association for Southern Attica (in Greek: ΣΥΔΑΝΑ).
4. “Inter-municipal partnership for the development of Western Athens with the use of ITI/SUD”, submitted by the Development Association for Western Athens (in Greek: ΑΣΔΑ) covering seven, and later on eight, municipalities.

These were selected out of a total of five submitted for the 2014-2020 Programming Period, following a competitive process.

The implementation of ITI/SUD in the Greek context

Although the relevant EU regulations were issued in 2013, the Special Service for Strategy, Planning and Evaluation (in Greek: ΕΥΣΣΕΑ), the National Coordination Authority based in the Ministry of Economy, Infrastructure, Shipping and Tourism (currently named the Ministry of Development and Investments), issued a guidance on ITI implementation in 2015. The same Ministry’s Special Service for Institutional Support (in Greek: ΕΥΘΥ) circulated additional guidance in April 2016. Based on these two guidelines the Managing Authorities (MA) could tweak the strategic directions for ITI implementation, liaise with local authorities and stakeholders, and shape the methodology and selection criteria for funding ITIs. The Ministry bounded the scope of the selection criteria by requesting MAs to consider the Research and Innovation Strategy (RIS3), municipal operational plans and regional and local spatial plans during the ITI selection process.

The MA for the Regional Operational Programme of Attica entered a dialogue with Urban Authorities in mid-2015 to prepare them for drafting and submitting ITI proposals. Subsequently, the MA issued a call to municipalities in the region of Attica in April 2017. Submissions had to cover either deprived areas or areas with special development dynamics. SUD strategies had to show how they were aligned with statutory (spatial) planning and programming instruments such as the Regulatory Plan for Athens, local plans and Municipal Operational Plans, the Attica RIS3 (in Greek: ΠΙΣΕΕ) as well as the Regional Strategy for Social Inclusion and Tackling Poverty (RSSITP, in Greek: ΠΙΕΣΚΕ). These regional strategies were aligned with the National Strategy for Social Inclusion (NSSI, in Greek: ΕΣΚΕ).

To approve the RSSITP, the Region of Attica (i.e. the elected regional governing body) ran a stakeholder engagement exercise. The participants included almost all the municipalities of Attica, NGOs dealing with social issues (including religious organisations), a handful of Greek Orthodox dioceses, some higher education institutions and several other special interest groups (disabled people etc.). Of the two stakeholders who could readily be identified as immigrant-related, one was representing Greeks from the former USSR and the other was representing Assyrian Christians. The consultation for RIS3 did not include stakeholders representing immigrants though the Sustainable Needs Economy features as one of the strategy's focus areas.

Other than the plans and strategies which they were required to align with, SUD strategies drew upon several strategies, plans and policy documents in addition to those to which the MA required adherence. The IUIPs previously drafted by Urban Authorities were extensively used as inputs in the drafting of SUD strategies. Other references found in the SUD strategies include the National Spatial Plan (Athens and Piraeus); the Sectoral Operational Programmes (Piraeus); McKinsey & Company's 'Greece 10 years from now', the Agenda 21, the National Strategy for Climate Change Adaptation, the Attica Basin Management Plan, the Attica Urban Waste Management Plan, the OP Competitiveness and Innovation and the OP Transport Infrastructure Environment and Sustainable Development (Southern Sector); the National Digital Strategy, the European Platform Against Poverty and Social Exclusion, the European Disability Strategy 2010-2020 (Western Sector).

Consultation and public participation in ITI/SUD strategies

The municipalities followed similar public consultation formats for their ITIs, structured in 3 rounds and embedded in the ITI governance system, as per the relevant MA guidance. The process included internal consultations as well as engagement with businesses and trade associations, local organisations and civic society. In outline terms, notwithstanding the particular circumstances of each case, the consultation process started off with an engagement with 'external' stakeholders such as businesses, NGOs and civil society to collect ideas and proposals. This initial stage was combined with an 'internal' consultation with Municipal technical and political staff and/or key stakeholders/partners. At a second stage, comments were received on the SUD Strategy draft, from 'external' and 'internal' stakeholders. The third stage has to do with stakeholder engagement in Strategy implementation and monitoring. Digital platforms were used in 'external' consultations.

Detailed lists of the participants in the public consultation processes were sought as part of the research carried out for this paper, but were not readily available. In the available stakeholder lists, only a couple of immigrant or refugee groups were readily identified. The public participation platforms and events were open to immigrants and refugees, although the language of communication during the public participation and stakeholder engagement

process was Greek in all cases. Indeed, there is some evidence that groups who have been in the country longer (e.g. the Assyrians) have taken part, but overall it should be assumed that recently arrived migrants could not easily participate without the use of a translator. However, it can be reasonably assumed that some of the NGOs which took part would have mentioned issues of interest or concern to immigrants and refugees.

The key institutional stakeholders involved in the ITIs therefore were the Ministry of Economy, the Region of Attica, the Managing Authority, the Municipalities concerned, various NGOs, special interest groups, business and trade organisations. Greek-speaking people without any other official capacity could also register their views, ideas and proposals online or in person/in writing. Immigrant and refugee issues were therefore not explicitly and extensively covered in the ITI/SUD, for what seem to be structural reasons. Other than the language barrier, the integration of immigrants and refugees did not feature as a topic in the higher-level inputs to which SUD strategies had to adhere to according to the MA requirements.

The treatment of immigrant integration in the ITI/SUD

Overall, there are a few explicit references to immigrants and refugees in the ITI/SUD. All strategies make an effort to align with the RIS3 and the RSSITP, in the context of the ROP. However, the RIS3 aims at the development of new and dynamic economic sectors, and the RSSITP deals with issues like poverty, social inclusion and the protection of vulnerable groups in generic terms.

- Athens' ITI/SUD focuses on tourism and the creative and cultural industry. It has 36 initiatives of which only 3 (on housing, shelter and smart city/web tools) explicitly mention immigrants as beneficiaries. There are another 8 initiatives on business and entrepreneurship, 5 on heritage and public spaces, 4 on environment and climate change, 4 on public space, and the remaining 12 cover social infrastructure and the protection of vulnerable groups.
- The Western Sector's ITI/SUD is concerned with economic growth, quality of life and with addressing poverty and need. It includes 23 initiatives, 11 of which refer to social infrastructure and vulnerable groups (3 explicitly refer to immigrant beneficiaries), 2 on environment and climate change, 7 on business and entrepreneurship and 3 on culture, heritage and public space.
- The Southern Sector's ITI/SUD is focused on harnessing the impact of three major nearby investment poles. It views multiculturalism as an attractive cultural feature of the area. It includes 23 initiatives, but only one mentions immigrants as potential beneficiaries. Otherwise, there are 12 initiatives on business and entrepreneurship, 2 on protection of vulnerable groups, 3 on culture and mobility, 6 on environment and climate change.

- Piraeus' ITI/SUD focuses on economic growth and social protection. It has 21 initiatives, 2 of which (on social inclusion and integration) mention immigrants as beneficiaries. Out of the remaining, 8 initiatives focus on business and entrepreneurship, 4 on environment and climate change, 2 on culture, heritage and city branding, and 5 on social infrastructure and the protection of vulnerable groups.

All the ITI/SUD were concerned with finding a compromise between the growth-oriented objectives of RIS3 and the equity considerations of the RSSITP. The ITI/SUD for the Western Sector focuses on labour market integration as a means to achieve that compromise. According to the senior IB managers interviewed, across the four ITIs there are indeed calls which have immigrants (and repatriated Greeks) as direct beneficiaries. However, the number of calls is bounded by the structure of the programme and the relevant initiatives that it foresaw by its design. As an example, the Municipality of Egaleo, in the Western Sector, issued a call for proposals for pilot projects to support the integration of marginalised groups. The call aimed to benefit immigrants who legally resided in the country, as well as Greek returnees, refugees with Greek citizenship, Roma and single-parent families.

The stance of immigrants and refugees themselves may also reinforce existing barriers. The Athens Observatory on Refugees and Immigrants (AORI, 2017) surveyed the needs of post-2010 migrants and refugees. The study, whose findings are similar to those of other relevant research (Karyotis et al., 2018), found that for 60% of recent migrants and refugees, Greece is a transition country. Around 34% expressed a wish to return to their homeland in due course. They therefore had no interest in learning Greek. The issues that concerned them were housing and basic orientation (understanding how the 'system' operates, their rights and obligations etc.).

The areas targeted by all ITI/SUD contain neighbourhoods where immigrants concentrate (see Figure 2 and 3). The longest discussion about immigrants and refugees can be found in the Athens ITI/SUD. In the Western Sector 'Enclave E' in Egaleo is given particular attention. It used to be an area where Assyrian Christian refugees used to live, they were then replaced by Kurdish refugees, and later on by economic immigrants from Pakistan and Bangladesh. The Western Sector's ITI/SUD has a special objective explicitly mentioning immigrants' integration in the labour market. The Piraeus analysis does not mention immigrants and refugees at all in the main body of the text but includes initiatives on protection of vulnerable groups which specifically target them. The ITI/SUD for the Southern Sector mentions Greeks from the former USSR, and has one initiative on infrastructure for children with mental disabilities which refers to immigrants.

In terms of the expected impact of the strategies on immigrants, overall, there is one initiative for a cultural cluster in the Southern Sector which bears a direct risk of gentrification and displacement. This is an isolated case but does indeed highlight the potential risks for

adverse social impact that come with place-based approaches primarily driven by economic development considerations- even in a tightly bounded socially sensitive strategic context such as the ITI policy framework. Having said that, the remaining initiatives in all ITI/SUD might in principle be of direct benefit to immigrants and refugees to the extent that the immigrants can access the labour market, can do business, use public spaces etc.

One interesting dimension, especially for Athens, is that few ITI resources were directly allocated to immigrant and refugee issues although the Municipality actively pursued immigrant integration as witnessed by the Urban Innovative Action they implemented, and by several other schemes (setting up the SynAthina civic collaboration initiative, participating in the delivery of ESTIA asylum-seeker housing programme etc.).

Discussion and conclusions

The integration of immigrants is not the main explicit focus of the four ITI/SUD covering the Athens FUA and the initiatives foreseen therein, although several of the actions foreseen in the strategies should in principle be beneficial to immigrants and supportive of their integration. There are several reasons for this.

To begin with, the strategies to which the ITI/SUD had to align (such as RIS3, RSSITP and the Athens Masterplan), do not explicitly address immigrant integration but focus on more generic policy topics which are highly relevant to immigrants, like economic growth, poverty, vulnerability etc. The limited responsibilities of local authorities over immigrant affairs, and the lack of an implementable national integration policy, which would take place-based initiatives into account, could also be listed as contributing factors. The requirement that immigrants should legally reside in the country if they are to benefit from ITI initiatives makes legal and administrative sense but occurs in a context where an unknown number of immigrants is undocumented. Although these characteristics reflect the Greek social cohesion and welfare policy approach, they bound ITI/SUD in ways which might make them less effective when it comes to immigrant integration.

As discussed, the ITI/SUD do often target areas with high immigrant concentrations, especially in the Municipality of Athens. This should contribute positively to migrant integration, however, the high concentration of immigrants in target areas (wherever this occurred) was an outcome of the focus of the MA call on localised deprivation, under a blanket approach to tackle social need for all ethnic and social groups. All the ITI/SUD address several issues of significance to immigrants and refugees, including (emergency) shelter, gender violence, labour market integration, basic skills, welfare support (food, income), primary health, psychological and legal support, etc. These issues are addressed as part of the effort to tackle poverty and vulnerability for the entire population, reflecting the RSSITP approach. There are advantages to this universalist approach, however recent migrants and refugees could find themselves at a disadvantage when it comes to benefitting from such measures due

to poor language skills and poor understanding of how things work in their host country. Undocumented immigrants face even bigger issues as they are not entitled to access the services offered by ITI/SUD initiatives.

Most, if not all, of the relevant initiatives foreseen in ITI/SUD should in principle have a neutral or positive direct primary effect on the lives of immigrants and refugees. This includes public space measures, programmes to support entrepreneurship and job creation. Clearly, public space improvement projects may lead to rising rents and property prices, risking gentrification as a secondary effect. However, given that a rising number of immigrants from the early 1990s are owner occupiers, often in less attractive urban areas, the actual effects of rising property prices on household wealth in such areas should be further explored. It can be reasonably assumed that immigrant groups who are already better integrated, stand a better chance of benefitting from measures which are aimed at business support, job creation etc. By the same token, public space measures, sustainable mobility or climate change adaptation measures do potentially benefit every resident who uses public spaces, public buildings or public transport/non-motorised transport (important to immigrants due to their lower car ownership). Digitisation of public services or 'smart city' initiatives do not necessarily benefit immigrants as much as Greeks, due to the significant differences in internet access between the two groups.

In addition, it could be expected that the implementation of RIS3 objectives would mostly benefit people well-established in the country, who can benefit from business opportunities or skilled job growth. Regarding initiatives related to the RSSITP, knowledge of the Greek language is not necessarily crucial when it comes to benefitting from initiatives like food banks. However, a working knowledge of the Greek language would facilitate participation in social support, orientation or upskilling initiatives, where Greek is the language of instruction. If such programmes were offered in English or some of the most widely spoken languages among recent migrants and refugees (Farsi, Urdu, Arabic, etc.) participation might go up but the purpose of training, i.e. integration in the labour market, might still not necessarily be served. This highlights the importance of allocating resources in programmes that are fit-for-purpose and reflect the needs of the potential beneficiaries. In this case, more resources should be allocated to Greek language courses in order to allow recent migrants to access the vocational skills courses etc that they would also need in order to improve their chances in the labour market (assuming that they would be interested in finding a job in Greece).

Finally, as already mentioned, the proposal for a 'Creative Cluster' in an urban quarter in the South Sector with significant immigrant and refugee presence, may lead to displacement and gentrification. Interviewee 4, who has good knowledge of the ITI/SUD drafting process, explained that the main concern at the time of drafting the SUD was to take full advantage of three important investments that will change the face of the area (Ellinikon airport redevelopment, Faliron Bay rehabilitation and the development of Stavros Niarchos Cultural

Centre). This person did not consider the number of immigrants living in the area in 2016 as significant, although the 2011 census has identified areas with high immigrant populations and their presence is evident when one visits the area. Although this is an exceptional case, it highlights how the socio-economic analysis supporting ITI/SUD should be robust, in order to support the ITI alignment with EU and national priorities.

There was limited immigrant and refugee participation in stages 1 and 2 of the consultation process, when ideas and proposals were suggested and when comments on the draft SUD strategy were received. The exception were Greeks repatriated from the former USSR and some more established groups (Assyrians etc.). Arguably, a factor contributing to low participation are the poor Greek language skills of recent migrants. Although English is widely spoken in Greece, it is not necessarily the case that many migrants and refugees speak it adequately and, in any case, public administration documents are always in Greek. Until all migrants learn to speak Greek, and put down roots in Greece, their ability to participate in the drafting of ITI/SUD will be limited unless either the entire process is also carried out in languages which they are able to speak, or the municipalities redouble their efforts to engage representatives from those communities. That said, it is possible that immigrants who speak Greek might have participated in the online participation platforms, for which no data could be obtained.

In any case, the approach of the Greek state to immigrant political representation is rather restrictive as discussed in the introduction. Only Greek citizens have voting rights, though EU citizens can vote in local and European elections. Therefore, recent migrants or even immigrants who have not obtained Greek citizenship have limited political leverage, even at the local level. Official representation, by immigrant and/or refugee organizations, in the ITI/SUD consultation process was limited, which indicates that these populations are disengaged from the political life of the places they live in, at least insofar as local urban planning matters are concerned. The Immigrant and Refugee Integration Boards might offer a useful forum between immigrant communities and local administration but, obviously, the political staff of local authorities is bound to be sensitive to the needs of the voters, first and foremost.

To conclude, in many ways, the Greek policy landscape mirrors the EU policy landscape when it comes to immigrant integration as an element of territorial development. Arguably this is a result of the way EU policy transfer works in the case of Greece. Greece is reasonably active in shaping EU immigration and asylum policy and indeed the national regulatory framework is relatively well developed. However, the country is a rather passive recipient of policy trends when it comes to integrated territorial development and territorial cohesion. In immigrant integration, where the member-states have greater competence, the EU requirements are satisfied (see the NIS case for example) but effective NIS implementation mechanisms have not been put in place. As explained however, the chosen national policy

approach focuses on integration via inclusion in labour markets and in accessing housing and key public services.

Immigrant and refugee integration efforts in countries with developed welfare systems rely on those systems for the delivery of housing, welfare benefits, access to the labour market, etc. Such a safety net is not well developed in Greece. For example, there is no social rental sector and the Greek state has tried to deal with this issue only recently, under enormous pressure from the (younger) voters who are unable to access housing due to prohibitive private sector rents and unaffordable housing prices. Municipal political staff also has no incentive to take action towards immigrant integration. Local authorities have limited powers on this matter, and even more limited funding at their disposal. Their legal obligation is, in effect, to engage with recent migrants and refugees in order to provide humanitarian support. Immigrant integration via place-based integrated territorial development is not an angle that has been directly and explicitly pursued so far in Greece, but the four ITI/SUD case studies from the Athens FUA show that this instrument provides fertile ground for a place-based social policy approach to flourish.

Recent migrants and refugees might in the future see Greece as a place where they would like to put down roots, and not merely as a stop on the way to another country. Access to the housing and labour markets is important in that respect. This is not easy to achieve, given the booming property market and the relatively high unemployment rates that still plague the labour market in Athens as a result of the 2010 public debt crisis.

In that context, ITI/SUD could support immigrant and refugee integration efforts at local level. To achieve this, immigrant and refugee issues could be mainstreamed in the ROP and its supporting strategies (RIS3, RSSITP). If that were to happen, then the next round of ITI/SUD strategies would have to explicitly address immigrant integration in order to align with the goals of the RIS3 and RSSITP. However, other structural issues like the language barrier could be addressed by national legislation after the implications of all the possible solutions have been thought through.

In addition, in future rounds of ITI/SUD strategies, mainstreaming and upscaling solutions which were found to be effective in other EU initiatives, like the Urban Innovative Actions (UIAs), could be an efficient and effective way for the European Commission to promote immigrant integration at the local level via a place-based approach.

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