

24th AESOP Annual Conference, Finland, 7 – 10 July 2010

Track 11 Housing and Regeneration Policies HOUSING AND REGENERATION POLICIES

A NEO-LIBERAL HOUSING POLICY? CONVERGENCE AND DIVERGENCE BETWEEN ITALIAN LOCAL HOUSING POLICY AND EUROPEAN TRENDS

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Keywords: Housing Policies, Italy, Europe

During the last 30 years, European countries housing policies have been changing, in different times, ways and intensity. Nevertheless, a common trend can be identified. Focusing on Italy, the paper explores, through a literature survey, the hypothesis of a growing convergence of the housing policies in European countries that have a different tradition (Italy, United Kingdom and The Netherlands). Despite the long tradition in the field of public housing policy of the two Northern countries, and despite the differences between them, some recent trends show a tendency towards a so-called *neo-liberal housing policy*. However, in Italy during the last few years some interesting examples of innovative housing policies have emerged at local and regional levels: Torino Municipality and Piemonte Region supply some examples. They seem to contrast, at least partly, with the general trend and to introduce a path towards a sort of “minimum level convergence” among European countries.

1. Introduction

Different European countries present some quite common general characteristics of current housing issues: the extreme fragmentation of demand, with a growing variety of social groups requiring housing and a diversification in the range of places exhibiting housing hardship; the increasingly close relationship between housing problems and other social issues (immigration, employment insecurity and flexibility, an ageing population, transformation of the traditional family, etc.); the overall decline of public spending on the housing sector; and the ongoing redefinition of the role of public authorities (Clapham, 2006; Hickman, 2006).

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From the point of view of public housing financing, Europe is characterized by a “traditional” model, that presents significant differences in different national contexts. According to Maclennan *et al.*(1997), also quoted by Gibb (2002), four main types can be identified. The first type includes some northern European countries (Netherlands, United Kingdom and Sweden), characterized by a wide public housing stock, also in relation to the high percentage of resources allocated to housing policies (3% or more of GDP). The second type, that includes Austria, Germany, France and Denmark, is distinguished by the role of private actors within housing policies in the face of public spending range from 1 to 2% of GDP. The third type is composed by some countries of Southern Europe (Spain, Portugal and Greece), where private ownership is of considerable importance and public expenditure on housing is less than 1% of GDP. Finally, the fourth type includes Ireland, Italy, Belgium, Finland and Luxembourg, where the centrality of private ownership is high and the public housing sector is weak (public expenditure on housing is about 1% of GDP).

The main ways in which public housing is promoted and managed in different European countries allow to outline the distinctive characteristics of national housing policy, to consider the role traditionally played by housing policy and to identify actual trends. Approximately during the last 30 years, housing policies have been changing. This happened in different times, ways and intensity. Nevertheless, a common trend can be identified.

Focusing on the Italian situation, the paper explores, through a literature survey, the hypothesis of a growing convergence of the housing policies in European countries that have a different tradition (Italy, United Kingdom and The Netherlands). According to De Jong (2004) (quoted by Gruis and Priemus, 2008), the social rented sector as a percentage of total housing stock is, in Netherlands, about 35%; in UK, 21-22% and in Italy about 7%. Other major differences characterize the three countries in terms of percentage of spending on public housing of total social spending (0.1% in Italy; 1,3% in The Netherlands and 5.6% in the UK, according Eurostat data, 2005). Despite the two Northern countries have a long tradition in the field of public housing policy, and despite the differences between them, some recent trends show a tendency towards a so-called, according to Clapham (2006), *neo-liberal housing policy*: deregulation of the public sector; the central role given to the private market and, specifically, to home ownership, and the progressive withdrawal of State intervention. These trends show different intensity and different results in the three countries. Italy belongs to a group of Southern countries in which State housing policy has always played a marginal role in answering to the housing needs and the current national housing policies are not moving away from this tradition, showing reinforced common trends towards the neoliberal approach. However, during the last few years, in tandem with the decentralisation processes that transferred authority in the housing sector to local and regional levels, some interesting examples of innovative housing policies have emerged at these levels, i.e. recent housing policies of the Municipality of Torino and Piemonte Region. They seem to contrast, at least partly, with the general trend and to introduce a path towards a sort of “minimum level convergence” among European countries.

2. Housing policies in some Europe countries: Italy, UK and Netherlands

2.1. Tradition and general trends

Following Priemus *et al.* (1993), the evolution of housing policies in European countries can be divided into three periods: the first period start with the end of the Second World War and arrive to the sixties; the second period extends from the sixties to the seventies and the third from the mid-seventies to now. To understand actual trends between national housing policies, it is useful to focus on the last stage. At the turn of the 70s and 80s housing policies in different European countries undergo some profound changes, that can be summarized in three main aspects. The first aspect is related to the change from a pure central and vertical approach to the housing issues to a more decentralised approach. The second aspect is the entry of private capital in financing social housing, often sought by the public sector itself. Finally, the third aspect concerns the change in the direction of public funding, with the transition from the “object” (the brick) to the “subject” (income support citizens), also related to a broader cuts in public spending in those years (Priemus and Boelhouwer, 1999). Concrete examples of these changes are the expansion of programmes to assist property (Doiling, Ford, 2007), the reduction in the construction of public housing and the shift of public spending towards social personal services (Gibb, 2002), the expansion of public-private partnerships and the role of private interests in housing policies (Collier, 2005), the professionalization of the sector (Houben, 2001).

These changes characterized both countries having a historically strong housing policies tradition and countries where the housing policies were weak. In general terms, the changes indicated have covered all countries, although the “retreat” from the state housing policy takes different shapes and timing in different countries. Therefore, it appears that, since the eighties, European states have played a pivotal role between local policies, private capital and the needs of citizens. This with appropriate exceptions, such as those mostly from Mediterranean countries, and especially with forms and different ways in different national contexts.

2.2. Italy: a very weak public housing policy

The Italian current housing policy shows some similar trends, as we will demonstrate, but the starting point and the evolution over time is different.

The starting points are two: the historical low levels of social housing provision (deLuca, Governa *et al.*, 2007) and the high percentage of homeownership. Especially the latter has been connected with the role that the building sector and the land rent mechanism have played in the accumulation process that in the ‘50s and ‘60s accompanied the economic boom of the country (Indovina, 1972; Secchi, 1972).

The percentage of owner-occupied housing increased a lot over time (45.8% in 1961, 71.4% in 2001, Census data) and is among the highest in Europe (in the EU-15 the average is about 64-65%). State intervention in providing socially affordable rental housing has never been able to cope with the demand.

The higher percentage of direct public investments in the building sector was reached at the beginning of the 1950s (25% in 1951), remained over the 10% until the beginning of the 1960s (11% in 1961) and since then it has always been less than the 10%. Although it had been argued that family solidarity has played and still plays an important role in compensating for the weaknesses in welfare state interventions (Allen, Barlow et al., 2004); Allen, 2006), this has not resolved the whole problem. Rather, for many years the housing market resulting from this system has proved to be the foundation of many social and economic problems. Foremost amongst these is a constant imbalance between social housing demand and supply.

The last important Acts related to housing policies were passed at the end of the 1970s: Law 392/78 (Rent Act), which introduced a system of controlled rents; and Law 457/78, which launched the Ten-Year Public Housing Plan for public investment in either social housing or in subsidised housing (with the latter generally meaning subsidised homeownership). In the following two decades, public investment in housing fell sharply and the ratio between investments in social housing and subsidised homeownership shifted increasingly in favour of the latter, with a constant diminution of the rental market in favour of the owner-occupied one. Also the Rent Act favoured the restriction of the rental market (vanHees, 1991), as the controlled rents were considered too low by the owners that preferred to keep their houses empty. This prompted an increase in evictions of households too.

However, during the 1980s, in many big cities (especially the old industrial cities in the North of Italy like Turin), housing demand from low income households started to decline, due to the fall in population and the slowdown in internal migration flows. Moreover, a new source of housing demand was emerging from medium and even high income households that were looking for better environmental conditions, and sought to address this through an expansion (in quality and quantity) of their housing consumption. In large conurbations like Turin, this fostered a counter-urbanisation process in the external metropolitan rings. Public investments coming from the Ten-Year Plan fostered these outskirt expansions and housing schemes generally encompassing subsidised homeownership built by private developers and a few social rental housing.

During the 1990s, public investment in public housing fell further: in Italy the production of social housing flats dropped down from 34000 per year in 1984 to 19000 in 2004 bringing the whole amount of public housing flats stock to 800.000 in 2007, while they were 1 million in 1991 (Presidenza del Consiglio dei Ministri, 2007). In the 1990s the limited public resources for housing policy were mostly allocated to the so-called 'integrated urban programmes', which in Italy fuelled urban renewal and regeneration policy (Governa e Saccomani, 2004). Moreover, at the end of the 1990s, the State further reduced its financial commitment in the field of housing. In 1998, the Rent Act was abolished and an indirect financial tool was introduced in the form of individual financial help to tenants. In general terms this measure has had a modest impact: in 2004 only the 3.5% of households living in a rental home were able to get this help, which covered only a part of the rent, but the meaning is that, instead of increasing public direct investment in

housing supply, the Italian government chose to allocate resources to direct or indirect money transfers to support families' access to home (this trend has been evident in nearly all European countries in recent years, Gibb, 2002). We should note also the privatisation of part of the State owned housing stock, another development which has been widespread over the last decade, and, moreover, that in Italy there is not such a strong tradition of the voluntary sector involvement in social housing (e. g. Housing Associations in UK or The Netherland). Finally, it is worth noting that in Italy the problem of housing has never been a problem of shortage, because the number of dwellings has since a long time exceeded the number of households even if with regional differences.

At the beginning of the new millennium, unresolved housing questions resurfaced also in research related to the housing conditions at the national, regional and local levels (ANCI-CRESME, 2005; Indovina, 2005; Nomisma, 2007). According to these studies, current housing conditions in Italy present some new challenges. Housing deprivation no longer concerns only traditional low income families, but new population segments, not previously affected by this problem (Tosi, 2006). For instance, in 2008 households living in rental houses were the 18.9% of the total households (ISAT, 2010), but this percentage adds up to 24.7% for young couples without children, to 30,6% for the singles and to 36,7% for mono-parental households with under age children (ibidem). Moreover, the changes in post-Fordist societies and the impacts of the globalization process, mainly related to labour market flexibility and to the diffusion of the risk of unemployment (Clapham, 2006), gives rise to new forms of social fragility and poverty, which have strong repercussions for housing needs.

In response to these changes, the national policies of the recent Italian governments have resulted in fluctuating trends and substantial ineffectiveness. In 2003 – 2004, the government (Prime Minister Mister Berlusconi) defined some measures addressed especially to support young couples and families to buy a house. Later on, in 2007 (Prime Minister Mister Prodi), the new government coalition reversed this policy and promoted new policies to extend the supply of rental housing, especially social rented housing; it gave also a definition of “social flat” (Law 9/2007), according to which “social flat” is a rented unity addressed to increase social cohesion by reducing housing hardship for disadvantaged households, supplying rental home and related facilities. The same law established also that social housing was a general interest facility the land for which has to be given “for free” by developers like the land for other public facilities; the implementation of this statement was up to Regional laws. In 2008 (Prime Minister Mister Berlusconi), the new government's Housing Plan (Law 133/2009) and other measures did not reverse completely the previous approach, but show a focus on a traditional way of supporting the real estate and building sector, viewing them as important components in helping to keep the entire economy working smoothly, in a period in which the real estate sector is weak. Actually, after a long period of expansion that began during the second half of the 1990s, unsold housing, due in large part to rising mortgage interest rates, is now increasing sharply. Alongside with a total amount of resources lower than the one decided by the previous government,

the present government's Housing Plan foresees a range of different measures, some of which are innovative too and recall other European countries policy tools.

The innovative elements are two: new tools to promote financial involvement of private funds in the production of "social flats", meaning flats to be rented at an agreed affordable rent or also to be sold to "disadvantaged categories", provided that they received some form of public fund; planning procedures according to which developers who increase the housing stock can be given development rights transferred from other parts of the urban territory, and an increased density ratio, that is non financial compensations via planning procedures. It is too early to assess the effectiveness of these government's measures, also because the worsening of the economic crisis in the last year is having a strong impact both on public and private investments in the housing sector.

Beyond the fluctuations of the national housing policies, in Italy some changes in housing policies can be tracked at regional and local level: during the 1990s, according to the decentralisation process housing sector-related competencies were translated to Regions and Municipalities. Therefore, given the traditional weakness of the national government on housing issues, it is not surprising that the most interesting developments in housing policies have taken place, and still take place, at regional and local levels. These experiences are currently characterised by two main innovative elements:

1. current housing policies now include a group of increasingly different measures, targeted at the demands of diverse segments of population (measures for young people, for the elderly, temporary residents, immigrants, etc.) and to respond to increasingly complex and fragmented needs;
2. the centrality of rent policies, specifically social rent policies.

To these main elements of change in local housing policies we can add other minor ones, i.e. the goal of 'social mixing', that is socially balanced housing schemes, and the increasing attention paid to environmental quality and sustainability of the housing buildings.

Local and regional housing policies in Italy operate through various mechanisms, which can be divided into three main categories: the allocation of resources for housing programmes, based on the supply of housing for rent; the definition of urban planning tools aimed at promoting housing for rent supplied through compensation mechanisms (a sort of planning gain similar to those of UK), and new financial instruments for social housing supply, for example, 'social housing funds', which often involve banking foundations and the non-profit sector.

These elements are exemplified by Piedmont Region's and Turin administration's housing policies. Piedmont Region policy encompasses two main initiatives: the 'Housing programme: 10,000 units by 2012', which provides for the creation of 10,000 units intended for social housing, experimental subsidised housing,

a programme for young people and a programme for the elderly; and ‘Guidelines for social housing in the Piedmont’ (November 2007), that provides for the creation of temporary residences (individual housing, collective residences, housing for social inclusion, such as protected micro-communities or social guesthouses/hotels) and individual housing for individuals who, although they have income exceeding the limits for staying in social housing, are unable to access the free rent or ownership markets. On a whole, the regional programme goal is to supply rental homes at a controlled price: most of funds are given to schemes which include houses to be permanently rented, even if at different prices according to the households income, built either by public actors or private developers. Scheme including owner occupied housing with the involvement of private funds are also financially encouraged with the goal of creating socially mixed communities based on tenure mix. Another indirect form of support to rental housing is financing local agencies addressed to make rental housing demand and supply match by means of subsidies either to the tenant or the owner. Only the programme for young people is a programme for first buyers with a direct financial aid and a guarantee on loans.

Recently also Torino municipality tried to move in the same direction (Governa e Saccomani, 2009). In Torino public housing policy has been historically weak, even during the periods of great historical immigration and population growth. Out of a total of 495,903 housing units today, there are about 19,000 public housing units (just over 3.7% of the total). Starting with the 1980s, public housing policy was mainly directed towards mixed schemes, in which social housing and subsidised private housing coexisted. In the 1990s, public housing constructions decreased further as a result of the fall in resources allocated to the sector (-51.39% in Turin) (Città di Torino, 2006). The situation did not improve after 2000: housing finance fell by another 30%. Moreover, the rental private housing market is more and more unable to provide satisfactory responses to an increasingly complex and diverse housing demand, linked with key social changes (ageing population, low education, low professional qualifications and unemployment, non-EU immigrants).

Since the end of the 1990s, and with greater resolve in recent years, Torino’s housing policy has changed. The municipality began engaging in innovative policies and became actively involved in urban regeneration policies through the so-called ‘integrated urban programmes’, showing, at least in general terms, the attempt to overcome a ‘traditional’ approach to housing policies based on a quantitative and aggregate representation of the problem. These changes are clarified in the set of initiatives that make up the ‘Housing Plan 2007/2008’, confirmed and strengthened in the ‘Housing Plan 2009/2010’. These ‘housing plans’ contain four main measures: rent subsidy, public housing, experimental programmes and “social housing”. Therefore, Torino’s new housing plans encompass many types of policies: policies addressed to specific groups of the population; measures trying to limit the spread of housing hardship; rent subsidies to offset, at least in part, the almost total disengagement of the State from public housing; search for greater efficiency in the provision and management of social housing, aimed at overcoming the risks of segregation

connected with traditional mono-functional and mono-class neighbourhoods. In relation to this last point, it is worth noting the decision to increase municipal property to be rented almost exclusively through buying existing housing units, rather than through new built properties. This decision appears to be an inevitable move, since the Master Plan does not provide any areas intended for public housing. Here we find some similarities with the UK situation and its planning gain system. A new rule was established by a change to the in force Master Plan, according to which a percentage of the new built private housing must be acquired by the city administration and used for social housing, or compulsory rented by the private developer at a reduced rent. Similar is also the idea that this measure could favour “socially mixed neighbourhood”. This concern about avoiding socially homogenous neighbourhoods can be traced back also in the decision of acquiring more than 500 units among those built for Media and Villages Athletes within the Olympic Programme for the Winter Olympics of 2006 to be used as rental social housing for different households categories, but also in the commitment of the city in urban regeneration policies.

On a whole, the city’s new housing policies are based on four main pivotal points, whose foundations in turn can be found in elements present in the international debate (MacLennan, Stephens et al., 1997; Gibb, 2002; Priemus e Dieleman, 2002; Stephens, 2003; Hickman e Robinson, 2006; Malpass e Cairncross, 2006): (i) the recognition of the growing diversity of housing demand and of its continuously changing nature leads to the attempt to adjust housing policies to the diverse set of social groups affected by housing hardship, or groups at risk of housing deprivation; (ii) the attempt to eliminate the inefficiencies of both centralised control and total public management of the housing problem; (iii) the need to respond to the lack of public resources for housing involving private actors, seeking to reconcile the public interest, housing market requirements, and the interests of people in need and (iv) the implementation of rent subsidy policies, in an attempt to better match demand and supply in rented housing (subsidising either the tenant or the owner).

2.3. United Kingdom major emerging trends

Social Housing privatisation

The main historic characteristic of English housing policy has been for about a century a strong role of the State in providing social housing. Even with some changes, this feature lasted until the end of the 1970s when the arrival of the Margaret Thatcher’s conservative government started a new trend (Gallent e Tewder-Jones, 2007) which has not be substantially inverted since then.

The turning point was the Right to Buy Act of 1980 (RTB), that gave to council housing tenants the right to buy their homes with a discount. This can be considered one of the first and most important steps towards more privatised forms of housing provision and to a residual role of state social housing. The RTB meant also a shifting from a traditional rental housing market to homeownership and this trend continued also during the Labour party government after 1997: “Over 2 million UK households purchased their homes between 1981 and 2003 with substantial discount and, in many cases, on relatively low price evaluation”

(Paris, 2007, 3). The same thing happened also in Italy, as we have seen, but the impact has been weaker because of the smaller amount of involved flats. The RTB had also consequences on the role of the voluntary sector – Housing Associations, a traditionally strong sector in UK – in providing rental homes: owing to resource constraints they “have failed to fill the housing supply deficit left in the wake of the public sector’s withdrawal from direct housing provision.” (Gallent, 2007, 74-75).

Homeownership prevailing over rental sector

Over time RTB was followed by other schemes of Low Cost Home Ownership initiatives, among which one of the most important is the conventional shared ownership (the owner buy a percentage of the house and rents the remaining part).

On a whole the consequences has been that UK’s housing system moved from one characterised by a strong State direct intervention and an important role of the rental sector, to one increasingly dominated by private sector provision and homeownership. This policy, addressed to increase rates of home ownership continued over time, sometimes supported also by the rhetoric of “choice”, recalled by government Green Paper “Quality and Choice. Decent Home for All” in 2000 (Munro, 2007) as well, with an astonishing (for us) result: in the present situation the percentage of homeownership in UK, 69,41% in 2007 (Joseph Rowntree Foundation, 2010), is not so different from that we saw for Italy.

The result was also the increase in the need of affordable houses, because the new housing system squeezed out of the market an increasing number of households that were not able to access the market, while social rented housing estates have been undergoing a sort of “residualisation” process.

Social Housing as “planning gain”

Confronted with a general decrease in housing funding, that affected Housing Associations too, local authorities reacted with seeking a greater involvement of private funding in social housing production by establishing new forms of indirect subsidy of the sector. This meant encouraging partnerships with private builders, “granting permission to provide ‘starter homes’ on publicly owned land” (Malpass and Murie, 1987, in Gallent e Tewder-Jones, 2007, 67), that is considering affordable houses among planning gains. In this case the negotiation of the contributions with the developer of a market housing scheme includes a specified number of low cost housing units, which are generally sold by the developer to the Social Landlords at a fixed price. Securing affordable housing through planning gain has been evolving since the beginning of the 1980s with different impacts on the amount of delivered affordable housing according to whether the scheme included public funds (Social Housing Grants) or not. In recent years there is evidence of an increasing proportion of affordable housing being delivered through these kind of agreement, but especially those including also public funds, while there is a decrease in developments exclusively for social housing, generally located on sites coming from the public sector which are problematic to develop (Crook,

Lister et al., 2005): the planning gain system alone is not likely to reach the goal of delivering enough affordable housing (Whitehead, 2007).

Greater focus on urban regeneration policies against social exclusion

Starting in the second half of the 1990s the new Labour government showed a new interest in the urban condition with a special attention to the neighbourhoods regeneration policy with researches (for instance, the Urban Task Force Report) and new policies for urban regeneration (New Deal for Communities in 1998, National Strategy for Neighbourhood Renewal in 2001), addressed also to combat social exclusion. In researches and policies an emphasis on the creation of socially “mixed communities” can be traced back. ‘Social mixing’ is seen in many European countries as one of the more promising mechanisms to enhance the opportunities and quality of life of urban dwellers (for a critical discussion, see for example (Lees, 2008); Musterd, 2008). Mixed tenure housing is sometimes indicated as a means to reach this goal, even if some surveys show controversial results (Kearns e Mason, 2007). It is worth to note that the planning gain system is often seen as a way to reach mixed tenure.

New century: housing affordability problem

Like in Italy, also in UK the housing supply problem has suddenly been rediscovered by the Government at the beginning of the new century (Bramley, 2007) (see, for instance, two reports of the Barker Inquiry in 2003 and 2004). In the case of UK the current housing problem seems to be either a shortage of dwellings, if compared with the current and forecast increase in households, or the affordability of the existing stock both for purchase and for rental (JosephRowentreeFoundation, 2010), owing to the increase in housing prices: both issues are marked by regional market imbalances too. A greater attention is given in the analysis to supply restrictions, viewed a major cause of the affordability problem, while less thought seems to be given in the inquiries to the issue of dwellings tenure, at least if compared with the greater emphasis on the increase of rental housing in some of local and regional Italian policies (§ 2.2). However, some researches indicate that in order to meet the future affordable housing needs it is necessary to build a greater proportion of social rented and low-cost owner occupied homes (Holmans, Monk et al., 2008), that is to increase public investments.

Affordable housing problem and land-use planning system

The shortage of dwellings and consequent affordability problem are generally related to the house building sector situation, to the decrease in the public sector direct investments and with increasing emphasis to land-use planning system, which does not allocate enough land for new housing development. This is, for instance, the idea put forwards also by Barker Report (Bramley, 2007). Thus the land-use planning system is related with the problem of delivering a sufficient amount of affordable housing both through the planning gain system and the way regulatory frameworks can enforce or reduce the provision of land for housing.

This problem has progressively become more serious because releasing more land could be in contrast with the new environmental preoccupations (Gallent e Tewder-Jones, 2007).

Summarising the main characters of the current housing situation in UK seems to be:

- a long standing and continued shift towards more privatised forms of housing provision;
- wide spread sale of public housing and a residual role of social housing;
- shifting nature of subsidies from support for production to consumption subsidies (housing benefit);
- emphasis on the imbalance between the forecast housing needs and affordable housing supply;
- focus on indirect tools to tackle the problem of housing shortage and affordability, namely the planning system.

2.4. The Dutch housing policy

In the Netherlands, housing policies have a long history of experimentation and innovation (Priemus, 2001, 2003; van Bortel and Elsing, 2007). The Dutch housing policy is the result of a “strong” tradition, in which the relationship between different forms of financial resources, the level of public expenditure and the involvement of several actors allowed a housing policy combining quantity and quality, the amount of social housing and the quality of housing and public services.

According to Gruis and Priemus (2008), “in an international context, social rented housing in the Netherlands is characterized by a relatively large stock of the total housing stock and a wide diversity of dwellings and tenants (not only low-income households)” (p. 488). The strategy underlying the above policy is based on three elements: (i) the clear support for the rental sector; (ii) the role of housing associations in managing the built heritage and (iii) the diversity of targets of public housing (not only disadvantaged or low income families but a set of persons highly varied and differentiated by age, class, income, ethnicity, etc..) (Gruis and Priemus, 2008).

The role of Housing Association is especially relevant. The social housing stock is mainly managed by housing associations, of which there were 518 in 2004, owning more than 99 per cent of the social housing stock. The “Housing Act and the Social Housing Management Decree” set out the legal rights and obligations of housing association. Despite in the Netherlands, Housing Association must give priorities to households with a weak positions on the housing market (mainly lower-income groups), they are also allowed to provide dwelling for other groups. So, Dutch housing association could be considered as “hybrid institution” (Priemus, 2001), “which perform public services and, at the same time, engage in market oriented activities as independent and private organisations” (Gruis and Priemus, 2008, p. 488).

The third aspect is the more controversial. It seems to indicate that, in the Netherlands, housing policies have somehow “advanced” some of the most innovative solutions in Europe and, at the same time, are back to general trends. In fact, Kemeny (1995, 2001), by focusing on the role of the rental sector, distinguishes between two main housing systems: “dualistic systems” and “unitarian systems”. They are related to two different, and potentially conflicting, views of the role of the State in the modern welfare systems and, specifically, in housing policy. Indeed, according to Kemeny (2001), “in one philosophy, the State takes upon itself the direct responsibility of providing rental housing for households in need. To this end, non-profit rental housing is organised in the form of the state or local government monopoly. (...) Access is in terms of “need”, - the definition of which varies over time and also between countries. (...) In the other philosophy, the state is either not a major provider itself or, if it is, access to such housing – often provided on a “not-for-profit” basis – is not limited to households in need» (p. 66). In short, in the “dualistic system, such as in Italy, public and private rental system sectors are clearly separated. Viceversa, in “unitarian systems”, just as in the Netherlands, the differences between profit and non-profit interventions are minimized. The advantages of the “unitarian systems” are economic (such as, for example, the declining cost of rent and the major investment opportunities in the field of housing), social and territorial (in particular, the overcoming of problems related to segregation and lack of social mix in the interventions of public housing).

Paradoxically, however, despite the advantages of “unitarian systems” of public housing, actual trends are pushing towards the “dualistic systems”. In this direction, a significant influence is exercised by the European Union. European Union formally should not (and could not) made housing policy. However, according to the Lisbon Strategy and the Kok report, the EU has actually appeared to promote a housing strategy mainly based on increasing housing ownership rates (Doiling, 2006). This strategy has a particular impact on the Dutch housing system whose “unitarian model” does not fit with competitiveness strategy and requires substantial adjustments towards the “dualistic model”, more consistent with policies at European level (Priemus and Dielement, 2002; Gruis and Priemus, 2008).

3. Conclusions

European countries traditionally present a strong diversification of housing policies, with a schematic division between northern and southern Europe. However, if we look at what is going on this diversification seems gradually to loose consistency and standardized housing policies emerge. National differences in social housing are placed within a framework of change that affects both the issue of housing and that of housing policies in all European countries.

If we consider the changes in housing issues, the main change is the growing range of housing needs and the diversification of the places where housing hardship occurs. The housing problem, in all its forms, has become progressively fragmented and is affecting parts of the population hitherto alien to this problem (Clapham, 2006). Therefore, the house problem seems to act as an evidence of social poverty emergency. If

this is obvious, less obvious is that the homeless (or the inhabitants of houses of unfit quality or too small) are steady increasing in almost all European countries. Overall the “new” housing question involves a growing number of families, not only among the weakest members of society but also, and increasingly, among the middle classes.

The growing range of demand collides with the need to change public housing policy. However, although the need for change is widely recognized (Kemeny, 1995), the direction to follow appears very uncertain. On one hand some trends in housing policies indicate a recognition of the demand fragmentation and, consequently, the diversification of social groups the actions are directed to. This means shift from a quantitative response to the housing needs to a qualitative one; new paths to directly help people and families; the changing role of the public actor, called not just to prepare solutions, even in the face of reduced financial resources, but also to enhance the participation of civil society, private actors and the non-profit sector in housing policies. The local and regional Italian experiences we described seem, at least partially, to move towards this direction, which is not in the tradition of the national Italian housing policy. On the other hand there is evidence of a moving towards a neo-liberal housing policy (Clapham, 2006): deregulation of the public sector; centrality of the private market and specifically homeownership; marginalisation of the social rented sector; progressive withdrawal of the role of the State. In the context of housing policies, the neo-liberal restructuring takes place mainly in urban housing markets (Brenner and Theodore, 2002), with moments of destruction («razing public housing and other forms of low-rent accommodation; elimination of rents control and project-based construction subsidies») and moments of creation («creation of new opportunities for speculative investment in central-city real estate markets; emergency shelters become “warehouses” for the homeless; introduction of market rents and tenant-based vouchers in low-rent niches of urban housing markets», p. 379).

The neo-liberal trend in housing policies affects in different way and intensity the different countries. However, the common evidence is that housing policies in European countries are either unable to define an alternative to the neo-liberal housing policy, even if faced with the changing needs and demand, or have difficulties in resisting to the pushes towards a “residualisation” of the public social housing sector, like, for instance, in the Dutch case. This case is interesting because it shows the entry in the field of housing policy of a new actor, the European Union. In spite of not having special competencies on housing policy, EU risks to play an important role in the field via its strategy to promote competitiveness. The Dutch case is probably particular owing to its historical “unitarian model” and its size of the social rented sector, but it has been argued that perhaps other European countries could be affected by the EU action too (Gruis and Priemus, 2008).

Within the common trend towards the neo-liberal approach, countries like Italy in which state housing policies have been traditionally weak, appear nearly to be in the forefront of the process (in the proportion of homes owned, in the percentage of social rented sector and in the phasing out the role of the state). However,

faced with the urgency of the new emerging social needs, Italian local and regional housing policies seem to move in the opposite direction, experimenting innovative responses which recall other European countries historical traditions.

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