

Planning policies and affordable housing

A cross-comparative analysis of Portugal, England and Denmark

Alves, Sonia

Publication date:
2018

[Link to publication from Aalborg University](#)

Citation for published version (APA):

Alves, S. (2018). *Planning policies and affordable housing: A cross-comparative analysis of Portugal, England and Denmark*. Paper presented at International Conference on the Global Dynamics of Social Policy, Bremen, Germany. https://www.cchpr.landecon.cam.ac.uk/Projects/Start-Year/2018/planning_for_affordable_housing/cross_comparative_analysis_bremen_2018/copy_of_cross_comparative_analysis_bremen_2018/at_download/file

General rights

Copyright and moral rights for the publications made accessible in the public portal are retained by the authors and/or other copyright owners and it is a condition of accessing publications that users recognise and abide by the legal requirements associated with these rights.

- Users may download and print one copy of any publication from the public portal for the purpose of private study or research.
- You may not further distribute the material or use it for any profit-making activity or commercial gain
- You may freely distribute the URL identifying the publication in the public portal -

Take down policy

If you believe that this document breaches copyright please contact us at vbn@aub.aau.dk providing details, and we will remove access to the work immediately and investigate your claim.

International Conference on the Global Dynamics of Social Policy

University of Bremen, Germany - October 25th & 26th, 2018

Sónia Alves and Gemma Burgess

Planning policies and affordable housing:

A cross-comparative analysis of Portugal, England and Denmark

Housing is one of the most fundamental human needs. The lack of affordable housing is one of the biggest challenges facing urban societies and planning is the key mechanism through which new housing is delivered and distributed spatially. Yet housing and planning have occupied relatively weak positions within systems of welfare when compared to other domains of social policy, such as social security, health, and education.

Developing typologies to enable comparative studies across countries can help us to understand the impact of the different positioning of housing and planning within social policy on welfare outcomes. For example, national level comparative studies of housing policies and outcomes have enabled us to identify and explain trends of divergence on levels and forms of state investment across different welfare regimes (Kemeny, 1995; Alves, 2017), whilst on a local level studies that compare large cities that face similar problems and challenges (e.g. related to migration flows, capital flows, increase of inequality) have identified traces of convergence (Alves & Anderson, forthcoming). However, planning tends to be a missing variable in such typologies. This paper advocates for the bringing together of housing, planning and welfare state provision in our comparative analyses of social policies and their outcomes.

Bearing in mind the benefits of interdisciplinary and comparative approaches in the fields of social policy, this paper aims to contribute to the advancement of theory by comparing the similarities and differences in the relationship between the welfare state, affordable housing provision and planning in Portugal, England, and Denmark.

Introduction

In this paper we argue that if you make housing and planning a key part of welfare policy you get better social and spatial outcomes. The more a housing system is commodified, due to the weak role of state regulation associated with marketized methods of allocation or a high reliance upon family provision, and the greater the degree of separation between housing, planning, and welfare policy, the greater the prospects of sub-optimal housing outcomes and socio-spatial inequality.

This paper focuses upon the notion of ideal types as a useful tool to build theory, guide the formation of a hypothesis, and derive lessons for policy and practice. The concept of the ‘welfare triangle’ is used to enable a more meaningful comparison between contexts, in which qualitatively different arrangements between the role of the state, the market, and the family exist.

Drawing on the examples of Denmark, England, and Portugal, we consider whether a focus upon housing and social protection alone is sufficient and make the case that planning is also important to ensure good social and spatial policy outcomes. The paper makes the case for the development of a typology of countries based not only on the level of de-commodification¹ and stratification produced by state intervention, but also on the degree of separation between housing, planning, and welfare policy. Such a typology considers the scale and characteristics of welfare provision (the ‘triangle’ state, family, and the market), as well as the ability of public authorities to achieve better integration of policies and practices, with visible impacts on housing and neighbourhood outcomes (cf. segregated/mixed communities, mono/mixed housing tenures etc.).

Bringing housing and planning into social policy and ideal types

Our premise is that housing and planning are key tenets of successful welfare policy. The aim of this paper is twofold:

First, after Kemeny (2001) and others (Malpass 2003, 2008; Stephens 2017), we argue that, on the one hand, housing must be considered a key pillar of welfare and second, from a cross-disciplinary perspective, housing policy and practice, land-use planning, and social policy should be seen in a more holistic (integrated or comprehensive) way.

These two claims are justified on several grounds. On the one hand, housing is the largest single item in household budgets, absorbing a great part of a family’s income (therefore affecting food choices,

¹ de-commodification - The ability of individuals or households to enjoy an acceptable standard of living independent of market participation (Esping-Andersen, 1990), commodification means therefore a high reliance upon market mechanisms.

healthcare needs, and educational prospects). Housing also affects well-being in terms of physical and mental health, educational attainment and social behaviour (Somerville, Sprigings 2005). On the other hand, the production of housing and the built environment influences processes of class formation and the quality of places where people live and work (Vigar et al. 2014).

Comparative work is crucial for learning across contexts

International comparative analysis of public policy is central to the development of policy theory and practice. Comparing what happens in different cities and countries, e.g. in terms of levels of state intervention, the form it takes, and how this affects well-being and levels of inequality within society, it is crucial to advance our understanding of the relationship between variables across geographical and time units. Even though the complexity of factors make generalisations problematic, “without generalisations and abstractions, the work would exist for us only as a chaotic patchwork of discrete, disconnected experiences and sensory impressions” (Joans & Knobl 2009).

The comparison across national and cultural boundaries and between different fields of state intervention (health care, old age, unemployment security, housing etc.) is a complex but worthwhile opportunity to deepen our understanding of how government intervention is not only historically and cultural grounded but also contingent to the balance of power between different economic and political interest groups within society (Stephens 2017).

In a context of globalization, and the increasing role of finance in the operations of capitalism (Aalbers, 2016), there is evidence that rejects the ideas of convergence (or structural determinism) and emphasize that: “countries have a choice within the same stage of economic development” (Oxley and Haffner, 2012: 203). For example, credit policies may be designed to support either rental or ownership tenure (e.g. for social housing building and refurbishment versus for home purchase), and governments can choose to promote home-ownership, the rental sector, or opt for tenure neutrality, creating a situation in which the consumer is financially indifferent about owning and renting a dwelling (Haffner 2003). Governments can also choose to promote a residual model of social housing reserved for the poorest segments of the population or promote a more universal model that does not define any social target and aims for the provision of good quality rental housing at cost prices.

Peters (2013) comments on the challenges related to international comparative research, referring to the “travelling problem”. He stresses that, whilst most quantitative research: “is almost by

definition variables based, these variables are put together in models with little concern about their context” (Peters 2013: 7). The fact that equivalent concepts mean different things in different countries, whether because of the nature of the item one is trying to quantify (Oxley, 2001), or because the concept in one specific setting is not used in other settings (Peters, 2013), makes comparison difficult. An obvious empirical ‘travelling problem’ is when a concept has different connotations in different countries or does not exist as such. In this regard, related to the content of comparison, Ruonavaara (1993) and Alves (2017) identify problems of comparative international analysis that focuses upon housing tenures.

In addition to the above-mentioned limitations, there are other layers of complexity related to the diversity of policies and practice beyond the national level (e.g. regional, local). Even in countries where there is a very high level of centralization, both in the formulation of policies or in issues of finance, studies have shown a great diversity across national and sub-national units.

One means of tackling challenges of complexity and diversity to enable comparison is the use of typologies and ideal types.

Ideal types

“The ideal type brings out the significance of the phenomenon.” (Bruun 2007: 217).

The concept of the ‘ideal type’ (‘idealtypus’) was proposed by Max Weber in 1904 (Bruun, 2007), and applied as a methodological instrument in *The Protestant Ethic and the Spirit of Capitalism* in which Weber claimed the relationship between a Protestant work ethic and the development of capitalism in Northern Europe.

As explained by Bruun (2007: 215): “the ideal type is stated by Weber to have its first function that of being an aid to the exposition of a scientific result”. It is a theoretical construction that aims to assist in the exposition of scientific results. A similar opinion is expressed by Peters (2013) when discussing strategies for comparative research in political science. Peters claims that: “a typology is the beginning of a theory about the subject matter used to classify the cases.” (Idem: 16).

Drawing upon Weber’s methodological writings, Bruun (2007) notes that: “apart from the function of the ideal type as an aid to the exposition of scientific results, Weber mentions its role as a heuristic instrument of causal analysis” (Idem: 225). Bruun (2007) adds that: “Weber explicitly

stresses that the relation of the ideal type to causal hypothesis is an indirect one – the ideal type is no hypothesis but seeks to guide the formation of hypothesis.” (Idem:229).

Apart from the exposition of scientific results, and the discussion of explanatory causes, ideal types have also been used to challenge current thinking and to predict, with a fair degree of certainty, possible impact of changes in policy. In this regard, for example, Kemeny’s thesis of Rental Markets claims that the privatization of housing consumption through owner-occupation will act as a powerful force to increase privatization in other spheres of welfare provision (Kemeny 2006).

As emphasized by Bruun (2007: 236), and illustrated by the above example, the prognostic function of the ideal type is of a hypothetical nature: *If* the conditions embodied in the type are present in real life, *then* we may expect to find an actual course of behaviour corresponding to the typical.

One of the advantages of the ideal type method, compared with a descriptive analysis of cases that merely juxtaposes differences and similarities between cases (Kemeny & Lowe 1998), is to further advance (middle-range) theories that can be tested against empirical data (Alves, 2017).

Comparative welfare state analysis - Esping-Andersen

One of the most influential contributions to comparative welfare state literature was elaborated by Esping-Andersen (1990). Using statistical data from the 1980s on protection against the basic social risks of unemployment, disability, sickness and old age, Esping-Andersen (1990) developed a comparative empirical study of 18 OECD countries (five of which are non-European, Italy being the only southern European country represented). Based on the level of decommodification provided by the welfare systems, that is, “the degree to which individuals or families can enjoy a socially acceptable standard of living independently of market participation” (ibid., p. 37), and the type of stratification produced by policies (Fitzpatrick & Stephens, 2014: 2016), Esping-Andersen (1990) proposes a classification into three types (or clusters) of welfare regime:

- Liberal: characterized by little state interference and a strong market orientation. Social benefits are means-tested and are, explicitly or implicitly, conditional on the beneficiary's income and/or wealth falling below a specified level. As a result, the state only provides help for a limited group of people with really low incomes and the society is characterized by high levels of poverty and inequality (England is considered a representative case);
- Corporatist: characterized by a system of social protection that is based on the status of individuals in the labour market and the history of paid contributions. Entitlement is

conditional upon a satisfactory contribution record; and the funding is mainly based on employer/employee contributions. Consequently, different groups are entitled to different welfare services which reinforces the preservation of an existing hierarchy in society (e.g. France, Germany);

- Social Democratic: characterized by universal provision of social security, health, and education favouring income redistribution at large. Benefits are typically flat rate and financed through general taxation. The redistributive effects of welfare intervention are low-income differences and poverty rates (Denmark is a representative example²).

In recent years several authors have claimed the need for a fourth welfare state regime beyond the original 'three worlds of welfare', to include the Mediterranean countries, especially Spain, Portugal, and Greece, where the role of reciprocity or of mutual help, provided by family and friends, tries to compensate for the widespread insufficiencies of state intervention. The thesis that rudimentary forms of welfare social provision develops a strong welfare society has been used to counter empirical evidence showing that welfare provision stemming from informal relationships tends to reinforce existing social inequalities and the vulnerability of disadvantaged families to poverty and social exclusion (Alves 2015; Wall et al. 2001). Meanwhile, the reference to a fourth regime of welfare - the Mediterranean cluster - rather than a sub-type of the corporative/conservative regime, seems generally accepted (for more details, see Alves 2015).

Table I presents general information on the demographic and socio-economic context of the selected countries and Table II a typology of welfare state regimes based on Esping-Andersen (1990) and Alves (2017).

Studies of the Portuguese case, as a representative of the Mediterranean regime, have shown the gradual convergence of country statistics in many social and economic domains (such as productivity, healthcare, education, and unemployment protection), but also the permanence of high levels of economic inequality. An explanation for this trend has been found in the observation that, whilst means-tested social assistance benefits are generally targeted at beneficiaries with very low income/wealth and are not so generous, other schemes (often more generous) tend to be directed at wider sections of the population that cannot be regarded as indigent (e.g. strong duality in the schemes – e.g. old-age pensions).

² The Danish government produces non-market services that are primarily funded through taxes. These services are wholly or partially available free of charge to private households and enterprises (e.g. day-care institutions, education, and hospitals).

Figures 1 and 2 show the Portuguese and Danish government expenditure on social protection by certain functions in 2017. With a share of approximately 44 per cent (in Denmark), social protection is the largest item of public expenditure in both countries covering the cost of unemployment benefits, old age pension, early retirement benefits, etc. Social transfers are the main instrument for the realization of welfare policies, and to reduce income inequalities. Figure 3 shows social protection expenditure, by function in 2015 in Portugal, Denmark and the United Kingdom.

Figures 4 and 5 show, respectively the expenditure in housing from 1995 to 2017 in the case of Denmark and since the 1970s for Portugal. In this regard, it is interesting to note the catch up on government expenditure between the Portuguese accession to the European Union in 1986 until the economic and banking crises of 2008.

The fact that Esping-Andersen's (1990) study was based on statistical data from the 1980s has raised the question of change or continuity over time within countries or typologies of countries. In this regard, Greve's studies have questioned and measured whether Denmark is still a universal welfare state with a high degree of equality, or whether it has introduced reforms/modifications that have mitigated its universalistic approach based on citizenship (Greve, 2018). That unemployment benefit was reduced from four to two years (Alves, 2015), and the eligibility criteria have been tightened in the field of social assistance and benefits has justified the question of transformation for the case of Denmark (Kersbergena et al. 2014). By using a case-based analysis in respect of three core areas of the Danish welfare state - pensions, unemployment, and early retirement benefit - Greve (2018) claims that the Danish model is more mixed today than it used to be, but it continues to be distinct in areas such as equality and there is a high level of spending on social security. Béland et al (2014) claim that there is no doubt that universality remains stronger in Denmark, whereas in countries that have been under economic pressure, such as Portugal and the UK, welfare restructuring engendered by ideology has typically proved more radical and detrimental to universality.

The results of these policies have been observed in statistics on income and living conditions. For example, the Gini Coefficient that measures the extent to which the distribution of income differs between a utopian distribution (where each member of the population has the same income) and

perfect inequality (where a single person receives all of the income),³ show that Portugal and the UK are part of the second group of countries with a Gini Coefficient above the EU-28 average⁴ (in the range of 31.0-34.9). At the other end of the range, with a Gini Coefficient less than 27.0, reflecting a more egalitarian distribution of income was Denmark.

Figure 6 shows the evolution, between 2008 and 2016, of the population 'at risk of poverty rate', after social transfers and using the cut-off point: 60% of median equivalised income. That is the population with a disposable income below the national at-risk-of-poverty threshold. In this regard, it is worth noting that the highest at-risk-of-poverty rates in Portugal and the United Kingdom. The lowest rates in Europe have been observed in Denmark (11.9 %), poverty whilst in Denmark. Figure 7 confirms the highest levels of income distribution in Portugal and the United Kingdom.

Both Esping-Andersen's ideal types of welfare state and more recent studies that try to measure the specific position of each country regarding their capacity to support the welfare of households and communities say nothing about housing, a gap that Kemeny (2001, 2006) attempts to fill by discussing the relationship between housing and welfare (below).

Ideal types - Housing (Kemeny)

Kemeny makes a number of significant contributions to the field of housing theory. One of the most important is the development of the theory of rental markets that is nowadays accepted as a theory of housing systems, as the long structuration of rental markets (in terms of rent levels and security of tenure), influences the wide structuration of housing markets.

Kemeny elaborates the theory of unitary versus rental systems in many of his works. In the book *The Myth of Home Ownership* (Kemeny 1981) he begins by noting that i) the percentage of homeownership varies considerably across countries, and ii) there is no direct relationship between the proportion of homeowners and the economic prosperity of a society. Moreover, countries with less developed welfare states evidence a higher percentage of home ownership (cf. southern European countries), while countries with strong welfare states and a high level of economic

³ The Gini Coefficient may range from 0, corresponding to perfect equality (income is equally distributed among every individual in a given society) to 100, corresponding to perfect inequality (when all of the income is received by a single person).

⁴ In 2016 the Gini Coefficient for the EU-28 was 30.8. The highest income disparities among the EU Member States were recorded in Bulgaria and Lithuania (Eurostat, 2018)

prosperity (e.g. Denmark, Germany, and Sweden) show a small proportion of home ownership (Table III).

Kemeny explains the fact that the purchase of housing predominates in some countries and not in others by the prevalence of different ideological values, and by differences in power relations that lead to divergent political strategies (Kemeny 2001).

By claiming that housing markets are a social construction reflecting patterns of social and power relations in each society, Kemeny (1995) establishes the relationship between dualist rental systems and liberal regimes, and between unitary rental housing systems and corporatist or social democratic regimes. Whilst in the former (dualist rental system) the state takes direct responsibility for the provision of housing for those in need (a social housing sector) that tends to be socially and spatially segregated, in the latter (the unitary or integrated rental sector) the housing is provided by a hybrid of non-profit organizations. Cross-national comparisons have contributed to our understanding of the main differences between these two models, highlighting both the broad structural trends and specific national housing policy determinants that have affected their divergent progression (Figure 8). Cross-national comparison has shown that the greater the reliance on market forces (e.g. through the liberalization of rents, models of production etc.) the greater the demand for more housing allowances and social benefits (Elsinga et al. 2014).

Kemeny also claims that the long structuration of housing markets can shape the transformation of wider welfare state regimes. Noting that owners and tenants have different attitudes towards welfare, Kemeny (1981) predicts that the growth of homeownership (associated with the growth of globalized mortgage markets and state strategies of owner-occupancy), will lead to voter resistance against extensive government spending on social welfare, and therefore to further privatization of other spheres of social life (Kemeny 1980). As explained by Lowe (2011), because families are burdened with the high cost of purchasing a house they tend to resist (extra) taxation required to fund welfare, using personal wealth, most likely derived from housing, to buy welfare services in several areas of social policy (such as health or pensions). Kemeny does not consider, however, the role of planning and its interaction with housing.

Making a case for planning

According to Nadin and Stead (2008), two main approaches can be used to classify spatial planning systems. The first starts from classifications of the legal and administrative structures within which

planning operates, while the second applies a wider set of criteria to identify ideal types of planning. The first makes an essential distinction between regulatory planning systems that use zoning to classify and qualify the permissibility of land uses (e.g. Portugal and Denmark, like most Continental European systems) as opposed to discretionary systems in which plans only have indicative force, (e.g. England, where decisions are determined case-by-case). The second classifies planning systems using a wider set of criteria that goes beyond plans or the legal system to consider other variables such as the scope of the planning system in terms of policy topics covered, or the distribution of powers among levels of government (national, regional, local).

In a book that compares the systems and practices of planning across 12 European countries, Reimar et al. (2014) reviews the four main ideal types identified by the EU Compendium of Spatial Planning Systems and Policies in 1997, emphasizing that the competence of the planning systems to promote an adequate integration of land uses, actors, and funding sources varies across countries. In this regard it is worth noting that Denmark (as well as the Netherlands) has been classified as a comprehensive-integrated ideal type, where the planning system works as a cross-cutting coordinator and regulator of sectoral policies with spatial impact (Reimer et al. 2014; Buitelaar & Bregman 2016; Needham 2014; Elinbaum & Galland, 2016), whilst England and Portugal respectively as a land-use and a urbanism planning ideal type. Whilst in the cases of Denmark and England a very close association between the dominant model of society and the dominant type of planning system has been emphasized (Nadin & Stead 2008: 44), the Portuguese case continues to be known for its narrow scope of purposes or planning objectives when regulating land-use transformation (Tulumello et al. 2018).

Whilst the planning typologies help us understand the main similarities/differences between collective modes of thinking and acting (Othengrafen & Reimer 2013), the reality is much more complex and nuanced.

Consider in this regard that in England the introduction of Section 106 of the Town and Country Planning Act 1990 introduced a broad range of contributions to be negotiated by planning authorities and developers, including infrastructure and on-site affordable housing provision (usually between 15 and 30% of residential units, depending upon viability assessments). At the local level, based on projections of population growth, household formation, housing needs, and economic trends etc. planning authorities calculate the amount of land and houses (in terms of sizes, types, and tenure) that should be made available for new housing production, and specifically for affordable housing as a condition of planning approval. By 2006-2007, 65% of all newly completed

affordable homes were negotiated through S106 (Burgess & Morrison 2014). The idea that the owner has no moral right to the full increase of land value that arises from planning decisions is generally accepted in England (Couch, 2016) and in Denmark where local authorities are entitled to develop site-by-site negotiations to secure the provision of cheap land for non-profit housing associations. A tool that has not been introduced in Portugal where planning authorities do not negotiate contributions for social and affordable housing as part of general market developments along with other infrastructure.

In Portugal, as in other southern European countries, the planning system has created what De Rosa and Salvati refer to as the 'mediterranean city archetype' - a city that is simultaneously compact and dispersed, with considerable differences of class, culture, and demography in which the concept of 'informality' (or settlement spontaneity) is preponderant. The gap between existent statutory plans (that classify and qualify the permissibility of land uses) and the reality, has also been manifest, showing the lack of consistency in application of rules and enforcement (Giannakourou 2005).

Unlike both the Danish and English planning systems, in Portugal we have not seen a commitment to prevent the creation of single tenure large estates and to foster the provision of affordable housing in market housing schemes. It is also interesting to note that whilst Portugal is not consonant with the English experience as regards the use of planning obligations to secure affordable housing, it has however introduced other ideas, embedded in a much more liberal thinking, such as the Right to Buy that compelled councils to offer tenants their homes at substantial discounts⁵ and partnerships between the public and the private sector that have reinforced patterns of social and spatial inequality within cities (for more details, see Branco & Alves, 2018).

Conclusions

The purpose of this paper is to contribute to the theoretical debate of the factors affecting social and spatial policies and their outcomes from an international comparative perspective.

The research started with two claims. That housing and planning have occupied relatively weak positions within systems of welfare when compared to other domains of social policy, such as social

⁵ Some authors have claimed that these changes in England were explicitly party-driven to create a Conservative-voting to undermine Labour's traditional council tenant constituency (Malpass, 2003).

security, health, and education. However, these two domains of intervention are crucial to get better social and spatial outcomes.

The problem addressed by this research, in terms of the key importance of housing as a pillar of welfare state and the rationale for a better horizontal and vertical coordination of housing, social and planning policies, has been emphasized by other scholars. For example, Gurran and Bramley (2017) or Burgess et al (2011) identify the inclusionary planning approach as a tool that can extract some of the development value created by granting planning permissions to secure the supply of affordable housing into new urban developments, even though emphasizing that more grant-supported public or third-sector provision is needed to provide genuinely affordable housing

In a context of an urban housing Affordability crisis (Wetzstein 2017), with overcrowding, rising rents and increasing social polarization (for more details, see Tammaru et al. 2015) only the articulation of tools that limit speculative profit and foster social and spatial redistribution (e.g. social benefits to help towards the cost of housing, non-profit housing delivery in market developments can engender a more equitable city and society (Helbrecht & Weber-Newth 2018).

By using the ideal type method, in this paper we discussed the main differences and similarities across countries vis-à-vis the arrangements between the state, the market, and the family. In this regard we noticed that whilst the Mediterranean and Liberal ideal-types produce high levels of commodification of housing and economic inequality, the social democratic model by using the re-distribution of wealth throughout social benefits and extensive housing schemes are more successful at limiting inequality.

Looking at the long structuration of rental markets we also emphasized that whilst the dualist housing typology produces a residual low-income rental sector restricted to families with fewer resources, therefore creating high levels of commodification and stratification that limits residential mixing and opportunities for interaction of social classes; the social democratic model by making housing a key part of welfare policy offer a good provision of quality rented housing at cost prices that is accessible for all. A strategy that has lessened social and spatial stratification

References

- Alves, S. (2015) "Welfare State Changes and Outcomes – The Cases of Portugal and Denmark from a Comparative Perspective." *Social Policy & Administration* 49 (1): 1–23.
- Alves, S (2016) Spaces of inequality: It's not differentiation, it is inequality! A socio-spatial analysis of the City of Porto. *Portuguese Journal of Social Science* Vol. 15, 3, 409-431.
- Alves, S. (2017) Poles Apart? A Comparative Study of Housing Policies and Outcomes in Portugal and Denmark, *Housing, Theory and Society*, 34:2, 221-248.
- Aalbers, M. B. (2016). The financialization of home and the mortgage market crisis. In *The Financialization of Housing* (pp. 40-63). Routledge.
- Béland, D., Blomqvistb, P., Andersenc, J. G., Palmeb, J., Waddand, A. (2014) The Universal Decline of Universality? Social Policy Change in Canada, Denmark, Sweden and the UK, *Soc Policy Admin.*, 48, 7: 739–756.
- Branco, R., Alves, S. (2018): Urban rehabilitation, governance, and housing affordability: lessons from Portugal, *Urban Research & Practice*, DOI: 10.1080/17535069.2018.1510540.
- Buitelaar, E., & Bregman, A. (2016). Dutch land development institutions in the face of crisis: trembling pillars in the planners' paradise. *European Planning Studies*, 24(7), 1281-1294.
- Burgess, G. and Morrison, N. (2014) Inclusionary housing policy in England: the impact of the downturn on the delivery of affordable housing through Section 106. *Journal of Housing and the Built Environment*, Volume 29, Issue 3 Page 423-438 (published online 2013).
- Burgess, G., Monk, S., and Whitehead, C. (2011) Delivering local infrastructure and affordable housing through the planning system: the future of planning obligations through Section 106. *People, Place & Policy Online*: 5/1, pp.1-11.
- Bruun, Hans Henrik (2007) *Science, values and politics in Max Weber's Methodology*, Ashgate, Copenhagen.
- Elinbaum, P., Galland, D. (2016) Analysing contemporary Metropolitan Spatial Plans in Europe through their institutional context, instrumental content and planning process, *European Planning Studies*, 24, 1: 181-206.

Elsinga, M., Stephens, M., & Knorr-Siedow, T. (2014). The privatisation of social housing: Three different pathways. *Social housing in Europe*, 389-413.

Esping-Andersen, G. (1990) *The Three Worlds of Welfare Capitalism*, Cambridge: Polity Press and Princeton, NY, Princeton University Press.

Eurostat. 2018. Accessed October 10, 2018. <http://ec.europa.eu/eurostat/>

Fitzpatrick, S., Stephens, M. (2014) Welfare Regimes, Social Values and Homelessness: Comparing Responses to Marginalised Groups in Six European Countries, *Housing Studies*, 29:2, 215-234.

Giannakourou, G. (2005) Transforming spatial planning policy in Mediterranean countries: Europeanization and domestic change, *European Planning Studies*, 13:2, 319-331.

Greve, bent (2018) At the heart of the Nordic occupational welfare model: Occupational welfare trajectories in Sweden and Denmark, *Soc Policy Admin.*, 52: 508–518.

Gurran, N., Whitehead, C. (2011) Planning and Affordable Housing in Australia and the UK: A Comparative Perspective, *Housing Studies*, 26:7-8, 1193-1214.

Haffner, M. (2003) Tenure Neutrality, a Financial-Economic Interpretation, *Housing, Theory and Society*, 20:2, 72-85.

Helbrecht, I., Weber-Newth, F. (2018). Recovering the politics of planning: Developer contributions and the contemporary housing question. *City*, 22(1), 116-129.

Joans, Hans and Knobl, Wolfgang (2009) *Social Theory. Twenty Introductory Lectures*, Cambridge: Cambridge University Press.

Kemeny, J. (1981). The myth of home-ownership: Private versus public choices in housing tenure. Routledge.

Kemeny, J. (1995) *From Public Housing to The Social Market*. London: Routledge.

Kemeny, J., Lowe, S (1998). "Schools of Comparative Housing Research: From Convergence to Divergence." *Housing Studies* 13 (2): 161–176.

Kemeny, J. (2001) "Comparative housing and welfare: Theorising the relationship." *Journal of Housing and the Built Environment* 16 (1): 53–70.

Kemeny, Jim. 2006. "Corporatism and Housing Regimes." *Housing, Theory and Society* 23 (1): 1–18.

Kersbergen, K., Visb, B. Hemerijck, A. (2014) The Great Recession and Welfare State Reform: Is Retrenchment Really the Only Game Left in Town? *Soc Policy Admin* 48, 7: 883–904

Lowe, S. (2011). *The housing debate*. Policy Press.

Malpass, P. (2003) The Wobbly Pillar? Housing policy and the British postwar welfare state, *Journal of Social Policy*, 32, pp. 589–606.

Malpass, P. (2008). Housing and the new welfare state: Wobbly pillar or cornerstone? *Housing studies*, 23(1), 1-19.

Nadin, V., & Stead, D. (2008). European spatial planning systems, social models and learning. *disP-The Planning Review*, 44(172), 35-47.

Needham, B. (2014) *Dutch Land-use Planning – the Principles and the Practice*, Ashgate, England.

Othengrafen, F., & Reimer, M. (2013). The embeddedness of planning in cultural contexts: theoretical foundations for the analysis of dynamic planning cultures. *Environment and Planning A*, 45(6), 1269-1284.

Oxley, Michael. 2001. "Meaning, science, Context and Confusion in Comparative Housing Research." *Journal of Housing and the Built Environment* 16 (1): 89–106.

Oxley, Michael, and M. Haffner. 2012. "Comparative Housing Research." In *International Encyclopedia of Housing and Home*, edited by Susan J. Smith, et al. 1, 199–209. Oxford: Elsevier

Peters, Guy B. (2013) *Strategies for Comparative research in Political Science*, Palgrave Macmillan

Reimer, M., Getimis, P., Blotevogel, H. H. (edit) (2014) *Spatial Planning systems and practices in Europe – A comparative perspective on continuity and changes*. Abingdon, Routledge.

Ruonavaara, Hannu. 1993. "Types and Forms of Housing Tenure: Towards Solving the Comparison/ Translation Problem." *Scandinavian Housing and Planning Research* 10 (1): 3–20.

Somerville, P., Spriggs, N. (2005) *Housing and Social Policy – Contemporary themes and critical perspectives*, Housing and society series, Routledge, London.

Stephens, M. (2017). *Housing regimes twenty years after Kemeny*. Heriot-Watt University.

Tammaru, T., Musterd, S., Van Ham, M., & Marcinczak, S. (2015). A multi-factor approach to understanding socio-economic segregation in European capital cities (28 pp)

Tulumello, S., Ferreira, A. C., Colombo, A., Di Giovanni, C., & Allegra, M. (2018). Comparative planning and housing studies beyond taxonomy: A genealogy of the Special Programme for Rehousing (Portugal). *Transactions of AESOP*, 2, 32-46.

Vigar, G., Cowie, P., Healey, P. (2014) Success and Innovation in Planning – creating public value, RTPI Research Report no.8

Wall, K., Aboim, S., Cunha, V. and Vasconcelos, P. (2001), Families and informal support networks in Portugal: the reproduction of inequality, *Journal of European Social Policy*, 11, 3: 213–33.

Wetzstein, S. (2017) The global urban housing affordability crisis, *Urban Studies*, Vol. 54(14) 3159–3177

Table I – General information on the demographic and socio-economic context of the selected countries

	Km2	Pop. (*1,000)	Foreign population (%)	Inhabitants per km ² (2015)	GDP per inhabitant/ adjusted for purchasing power (dollars)
Denmark	42,934	5,781 (2018)	8.4	131.9	49,613
UK	246,610	64,5	9.2	261	41,159
Portugal	91,916	10,627 (2018)	3.9	112.5	15,400

Source: Statistics Denmark (2018), INE (2011)

Table II – A typology of welfare state regimes based on Esping-Andersen (1990) and Alves (2017)

	Esping-Andersen (1990) Typology of welfare state regimes	Levels of housing de-commodification	Levels of stratification	Levels of economic inequality/ risk of poverty
Denmark	Social Democratic	High / non-profit housing associations	Low levels of differentiation (universalism)	Low
England	Liberal	Low private sector	High levels of differentiation (use of means-testing)	High
Portugal	Mediterranean	Low private sector	High levels of differentiation (based on social occupational status, use of means-testing) family responsibility	High

Table III – The state of housing in the EU 2015

	Owner occupied	Private rent (rent at market price)	Social rent	Other	Nr dwellings per 1000 inhabitants
Sweden	40	22	19	19	480
Germany	45,4	50,4	4,2		506
Denmark	51	49			491
Austria	51,6	28,3	20,1		555
France	57,7	21,9	17,4	3	423
Belgium	64,8	27,5	6,5	1,2	473
UK	64,2	17,6	18,2		437
Netherlands	60	7	33		429
Ireland	69,7	18,5	10,3	1,5	440
Portugal	73	18	2	7	556
Greece	73,2	21,7	5,1		590
Spain	78,9	13,5	2,4	5,1	538
Romania	98	0	1,5	0,3	425
....

Figure 1 - State expenditure by certain functions in Denmark, 2017

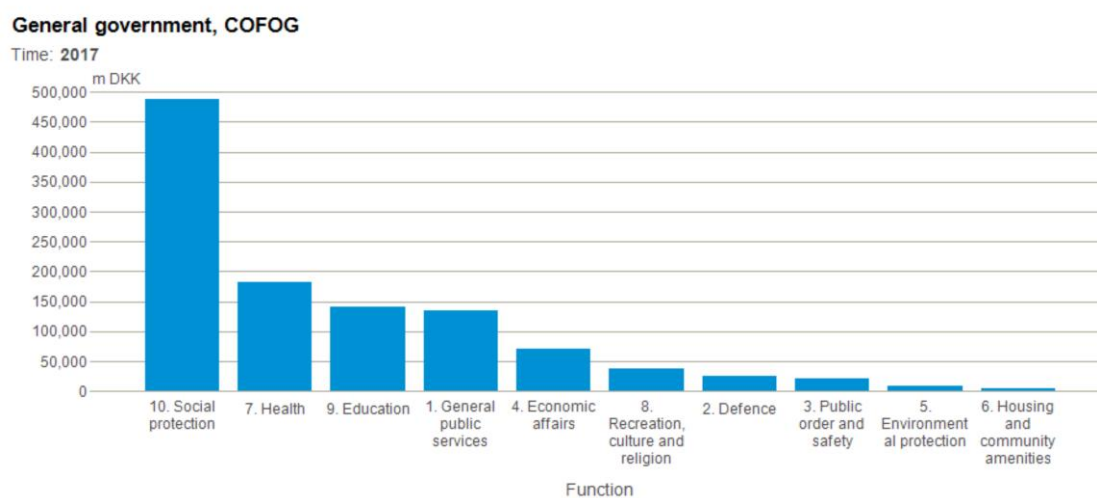
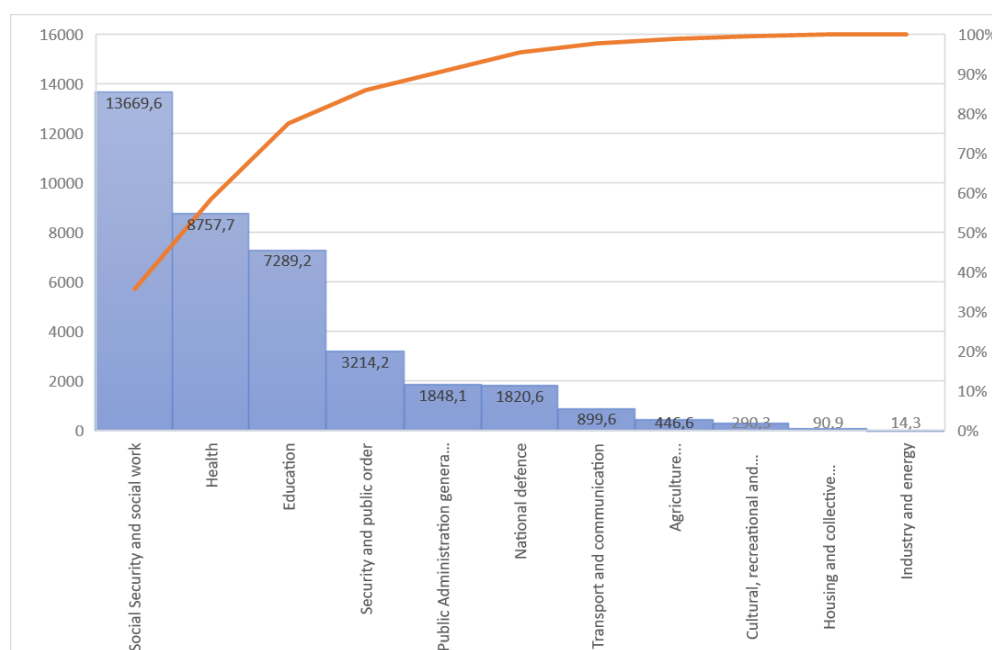


Figure 2 - State expenditure by certain functions in Portugal, 2017



Source: Pordata (2018)

Figure 3 - Social protection expenditure, by function (%) in 2015

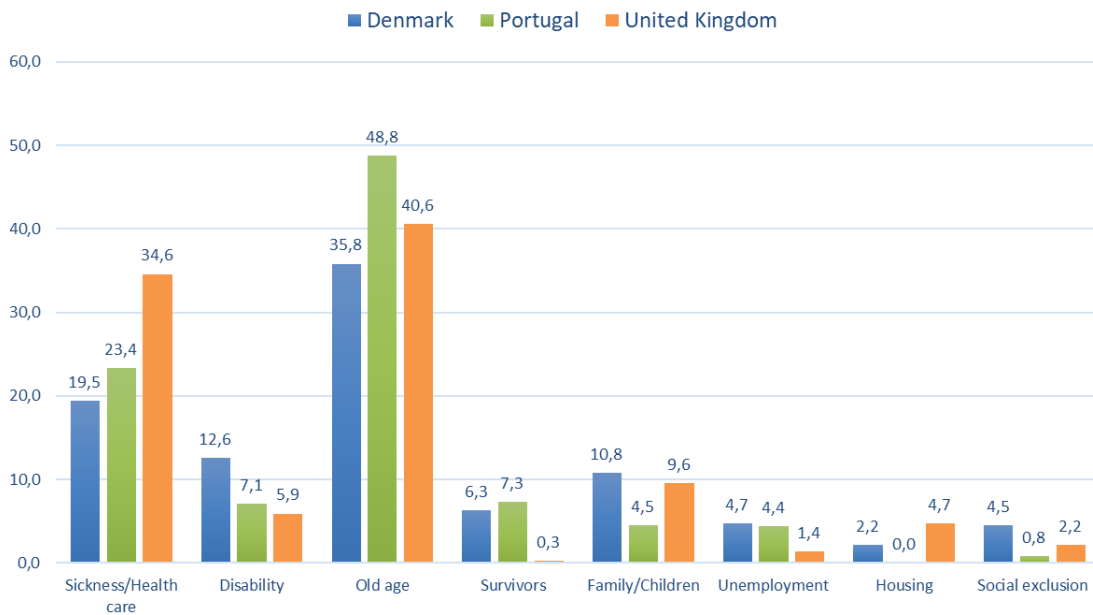
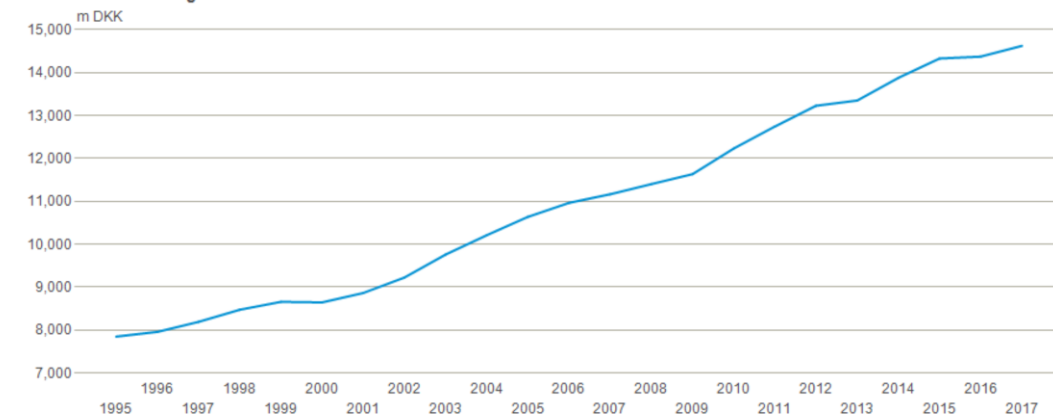


Figure 4 - State expenditure in housing (1995-2017): Denmark.

General government, COFOG

Function: 10.6. Housing



Source: Statistics Denmark

Figure 5 - State expenditure in housing and collective services, in euros (1972-2017): Portugal

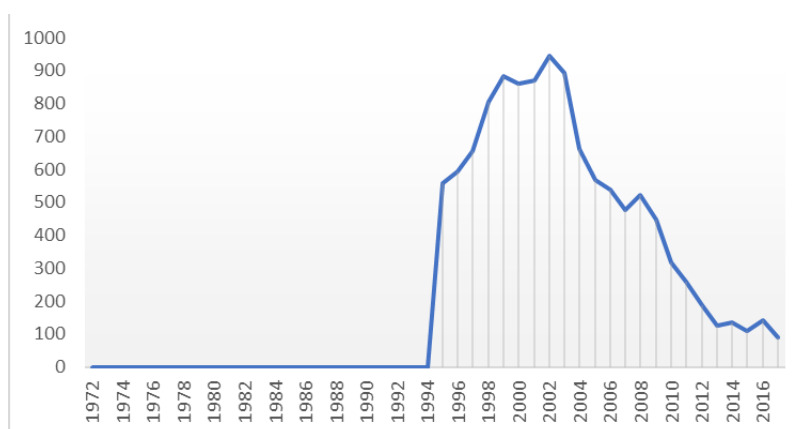


Figure 6 – Population at risk of poverty rate after social transfers (2008-2016) - cut-off point: 60% of median equivalised income)

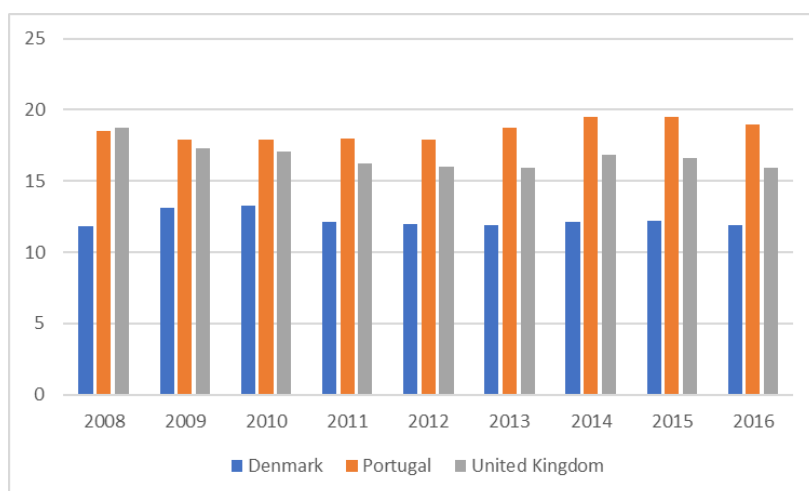


Figure 7 – Inequality of income distribution (S80/S20) between 1995 – 2006.

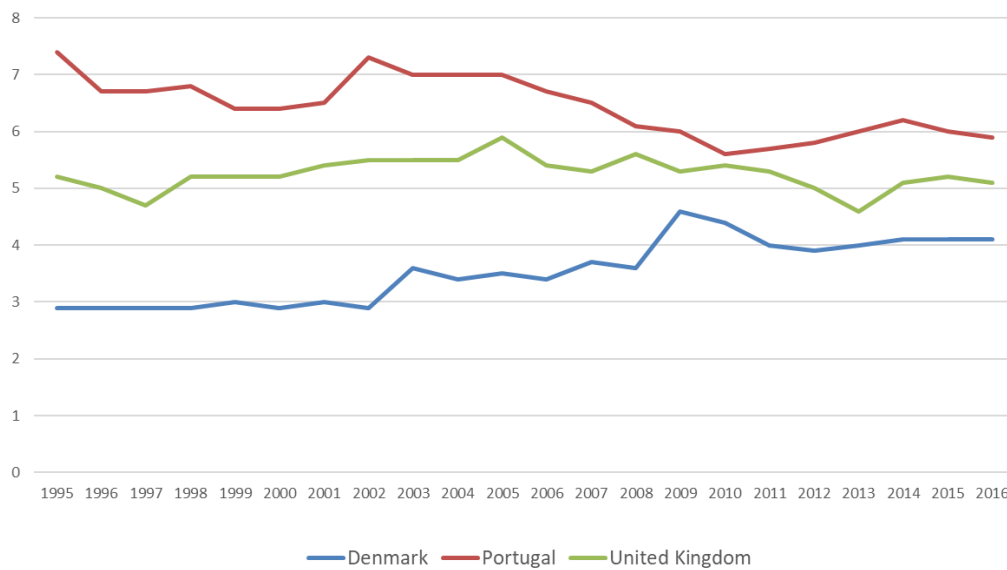
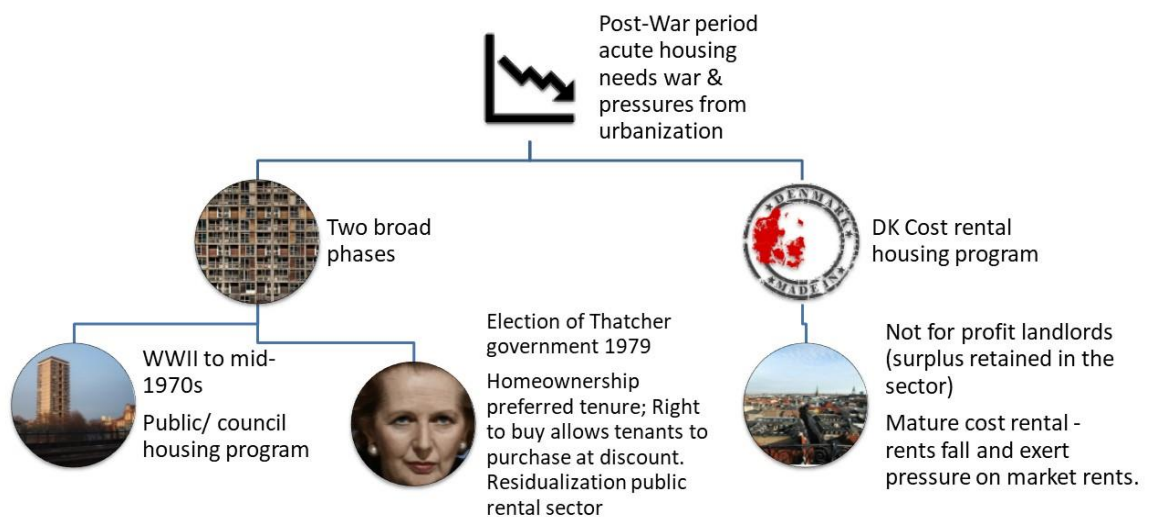


Figure 8 - Evolution of a dualist rental system in England, and a integrated rental system in Denmark.



Acknowledgements

Within the framework of a Marie Skłodowska-Curie Individual Fellowship, Dr Sónia Alves is currently developing the project PLANAFFHO (PLANning for AFFordable HOusing). This project has received funding from the European Union's Horizon 2020 research and innovation programme under Grant Agreement No. 747257.