# Rethinking the Concept of 'Housing Regime'

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Abstract: 'Housing regime' is a term that is used relatively often in (macrosocial) research comparing housing policies and systems. However, there is no generally accepted definition of this term. In this paper I shall first scrutinise previous uses of the concept, starting with a discussion of the most famous regime concept – the welfare regime. The discussion paves the way for a redefinition of a 'housing regime': the set of fundamental principles according to which housing provision operates in some defined area (municipality, region, state) at a particular point in time. Such principles are thought to be embodied in the institutional arrangements that relate to housing provision, in the political interventions that address housing issues, and as in the discourses through which housing issues are customarily understood. This definition is compatible with the path-dependence approach that has been adopted here and with the aspects of reality that researchers want to capture using the 'regime' concept.

**Keywords:** housing regime; welfare regime; path dependence; theory.

## Why 'regime'?

The term 'housing regime' is often used in comparative housing research, but there does not seem to be any consensus on how it should be defined. This paper discusses critically some of the uses of the concept and suggests a definition for it that is based on this discussion. First, I will consider what intuitions are linked to the use of the word 'regime'.

The Oxford Dictionary of English gives two definitions for the noun 'regime':

1 a government, especially an authoritarian one: *ideological opponents of the regime*. 2 a system or ordered way of doing things: *detention centres with a very tough physical regime* | *a tax regime*.

The notion of a regime as an 'ordered way of doing things' is quite similar to what the most famous regime concept in the social sciences – welfare regimes – attempts to capture. Gøsta Esping-Andersen argued that Western welfare states can be divided into three regime types: 'liberal', 'conservative', and 'social democratic' (Esping-Andersen 1990: 26-29). Later, other types, such as Southern European, post-socialist, and productivist regimes, have been added to the original trio. Since 1990 there has been a great deal of work in housing studies that has used Esping-Andersen's original typology and subsequent developments of this typology (e.g. Doling 1999; Kemeny 2001; Matznetter & Mundt 2016; Zhou & Ronald 2017).

Esping-Andersen wanted to introduce a concept that captures the provision of welfare more broadly than what focusing on social policies alone does: To talk of a 'regime' is 'to denote the fact that in the relation between state and economy a complex of legal and organizational features are systematically interwoven' (1990: 2). Regime is a concept that cuts across different social policies and also involves aspects of society other than just social policy: the organisation of labour markets, cultural matters such as gender roles, and matters of political power relations and ideology.

In an article discussing welfare state typologies Pekka Kosonen is very clear that such typologies should be based on theoretically derived criteria that he understands as variables (Kosonen 1995). The variables he chooses for his own typology are labour market structures, gender relations, and social security arrangements. What Esping-Andersen's variables are, is less clear, though the defining criteria can be seen as including the mode of welfare provision, whether it is through the state, the market, or the family (i.e. Stephens 2016: 22), the nature of the benefits (universal/selective), and the class/status effects of the welfare arrangements. It is, however, not clear whether Esping-Andersen wants to specify the variables by which welfare regime types are distinguished.

Esping-Andersen writes about 'liberal', 'corporatist', and 'social democratic' regimes (all written with quotation marks) as clusters or *types* of welfare regimes, not as regimes themselves (1990: 26-27). Admittedly, he is not entirely consistent in this usage (1990: 28), but in an earlier text he wrote that each country has its own regime: 'Each nation exhibits its own unique regime characteristics and, as society historically evolves, it will pass through distinct regime changes and institutional realignments' (Esping-Andersen 1987: 7).

This seems to indicate something similar to the theory of types and forms of housing tenure. According to this view, housing tenures can (and often should) be analysed on two levels: that

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of historically specific forms and that of general, idealised types. For example, there may be distinct forms of owner-occupation in a country but all of them can be classified as homeownership by their correspondence to the type-defining criteria along three dimensions: security of tenure, rights of use/control, and right of disposal (Ruonavaara 2005: 214-215). It can then be discussed to what extent those forms really conform to the type-defining criteria. Esping-Andersen's typology is similarly ideal typical (Esping-Andersen 1987: 7).

### From welfare to housing regimes

The problem of Esping-Andersen's theory for housing researchers is that it does not deal with housing (see, e.g., Stephens 2016: 21). However, housing can be seen as one of the four pillars of welfare along with social assistance, health and education (Kemeny 2001: 53-57). As Torgersen has pointed out, it is a quite distinctive pillar of the welfare state, as the role of the private sector is different from what it is in education and health (see Torgersen 1987). Private market actors are much more central in the production and distribution of housing than in the provision of health and education. This may be one reason why housing is left out of the Esping-Andersen model focusing on the extent of the *de-commodification* of the provision of welfare goods.

As the usefulness of the Esping-Andersen typology came to be questioned in housing research, it was quite natural that researchers started to develop distinct regime models for housing provision (opening up the possibility of discussing relations between welfare and housing regimes). Probably the best-known of these is Jim Kemeny's regime concept. It has been explored in several publications, but I will focus on the latest of these.

In the prize-winning article 'Corporatism and Housing Regimes' (2006) Kemeny discusses the relation of Esping-Andersen's welfare regimes to housing regimes. He discards Esping-Andersen's welfare typology and substitutes it with a typology of systems of (political) power. The key is the degree of corporatism in economic and political decision-making. In corporatist political regimes economic, social, and labour market policies are made through negotiations between employers' associations, trade unions, and the government. When such a tripartite system does not exist, there is no corporatism. According to Kemeny, corporatism comes in three kinds, one where 'capital' (employer's unions and bourgeois parties) is dominant, one where 'labour' (trade unions and leftist parties) is dominant, and one where there is a power balance between the two.

Like in Kemeny's earlier work, the type of *housing tenure* is central in defining housing regimes. While his earlier work focused on the contrasts between countries dominated by homeownership and those dominated by (non-profit) renting (Kemeny 1981), now the key defining features of housing regimes have to do with renting. The basic distinction is between *dualist* and *integrated* or *unitary* rental-market systems. It is typical of societies dominated by homeownership to have a 'dual rental market', where the private sector is open to unregulated profit-seeking, but the public rental sector is tightly regulated. In contrast to this are countries where a 'unitary social rental market' has been created: both the private and the public sector operate within the same institutional regulations and compete with each other. The dual system tends to marginalise renting, whereas the unitary system makes it a competitive alternative to home ownership.

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Kemeny then observes that the countries with unitary rental markets (Germany, Switzerland and Sweden) differ from each other in the power that the non-profit sector has in the market. He further breaks down integrated rental markets into those in which the non-profit sector (a) influences, (b) leads, or (c) dominates the market. He argues that there is a neat connection between the type of corporatism and the type of housing regime (see Kemeny 2006, table 4). This argument, however, is meant to be a theoretical one (though it is based on observations about the countries discussed). Thus, at the end of the article some of the preceding arguments are concretised as hypotheses.

Why should housing regimes be defined by the rental system? A central idea in Kemeny's work is that housing is deeply embedded in the social and cultural structures of societies. In his early work he argued that the dominance of homeownership in a country both reflected and supported the *privatist* nature of its socio-cultural structure. The dominance of home ownership is not 'natural' but is socially and politically constructed. Much of this construction has to do with non-decisions: homeownership is made attractive when the state chooses not to provide alternatives to it. Thus, how rental housing is organised in a society is indeed very central to the nature of the housing regime. If key housing policy is about rental housing, characterising housing regimes by how the rental sector is organised becomes logical and understandable.

In a recent book David Clapham presented quite a different conception of a housing regime (Clapham 2019). Clapham is very explicit about the theoretical perspective from which he approaches housing policy. It is a political and conflictual one, seeing policy not as rational problem-solving but as an arena in which actors with different interests and views negotiate and bargain. He also sees policies as discursively constituted. Discourses define the policy problems as well as the policy solutions that are as much permeated by meanings as the definition of the problems are. He proposes a three-stage analysis of housing policy (Clapham 2019: 17). First, the researcher should analyse the actors' 'language games' by which the policy problems become defined. Second, s/he should investigate the coalition-building strategies that actors use to support their position. In the third stage, the researcher should turn to power relations between the actors, as well as their 'power activities' (op. cit., 19). Though the approach has a focus on discourse, it is not *strongly* constructionist, as it involves the analysis of the games that political actors play.

Clapham defines a 'housing regime' as 'the set of discourses and social, economic and political practices that influence the provision, allocation, consumption [of housing] and housing outcomes in a given country' (Clapham 2019: 4, 24, 34, 39). Clapham is also clear about the distinction between housing regimes and regime types that are idealisations based on observations on countries (op. cit., 35). 'Every housing regime is unique' but regimes can be categorised by identifying 'some key indicators' (op. cit., 39). Consequently, he created a table titled 'The six housing regimes' relating to the countries dealt with in the book: the UK, Sweden, China, the USA, Australia, and Argentina. The table presents four dimensions of difference between the countries: variety of capitalism, welfare regime, institutional structure (corporatist, market dominant, government dominant), and housing outcomes. However, these are hardly variables that *define* the housing regime. The table functions as a justification for the choice of the six countries as cases by identifying 'main factors' distinguishing them from each other (op. cit., 39).

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The book focuses almost entirely on what Clapham calls a *neoliberal regime*. In that regime 'state intervention is kept to a minimum', the function of housing policy is to regulate and steer the market for efficiency, and privatisation of the housing system is favoured (Clapham 2019: 37). There is little discussion of other types of regime. Clapham refers to the social-democratic and conservative regime type (op. cit., 51), the Southern European type (op. cit., 102), and the productivist one (op. cit., 192). These types are familiar from the discussion on Esping-Andersen's theory and further developments of the theory. The idea of other housing regimes is not explored because the book's focus is on the neoliberal regime that Clapham sees as utterly influential in the contemporary world (op.cit., 192).

Blackwell and Kohl recently criticised the usefulness of approaches that are 'based predominantly on the assumption that the type of housing system in any given Western society should generally reflect its welfare state and/or institutional industrial tradition' (Blackwell & Kohl 2019: 300). Kemeny's theory is specially discussed in their article. They criticise *housing-welfare regime* approaches for a lack of historical sensitivity and empirical accuracy and present their own typology based on the mode of provision of housing finance. This is somewhat similar criticism to the call from some historical social scientists to go 'beyond welfare state models' in welfare-state research. Kettunen and Petersen argue that regime typologies 'cannot be more than analytical ideal types or crude generalizations' and that they are just 'tools for research process' (Kettunen & Petersen 2011: 3). This is a sensible point, one that also concerns housing regime typologies. But the conceptualising of a regime can be independent of any particular construction of a typology. Clapham's concept of a regime does not entail the typology he uses.

## The path-dependence perspective on the housing regime concept

For Kemeny 'housing regimes' were primarily about the organisation of rental housing provision in a society. This is a narrow conception of a regime that hardly captures the 'ordered ways of doing' housing provision more generally. Clapham's conceptualisation of a housing regime as a 'set of discourses and social, economic and political practices' is more general but perhaps too broad. It is based on a sound (Foucaultian) insight that there is no practice without an explicit or implicit discourse and no discourse without a real or implicit practice. While more general, Clapham's conceptualisation lacks simplicity that might be desirable. Moreover, I would like to distinguish a regime as an 'ordered way of doing' from discourse as an 'ordered way of speaking'.

I will develop my suggestion for the definition of a housing regime from the perspective of one of the three approaches to comparative housing policy analysis that Clapham presents in his book, that of path dependence (Clapham 2019: 28-31; Bengtsson & Ruonavaara 2017; Blackwell & Kohl 2019). The approach is an actor-centred one: institutions and policies come into existence as a result of actors' actions in decisive situations. When a particular development path is chosen, for example, an institution or a policy is established, and it becomes costly to choose other paths. The path-dependence perspective originally focused on continuity and inertia. Change was to happen only in rare occasions of *critical juncture*, often resulting from external shocks to the system studied. However, the fact of constant, undramatic change in institutions and policies has made it necessary to complement the theory with ideas of gradual change (e.g. Mahoney & Thelen 2010).

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An example of the path-dependence approach to housing regimes is a comparative study of the development of housing policies in Nordic countries: Denmark, Finland, Iceland, Norway, and Sweden (Bengtsson et al. 2013). The development of housing policy in each country was analysed with the help of an ideal-typical periodisation of housing policy (Bengtsson et al. 2013: 23-26). In all of the countries four historical stages of the development of housing policies could be distinguished: (1) the introduction stage, (2) the construction stage, (3) the management stage, and (4) the public retrenchment or privatisation stage. With the onset of industrialisation, housing policies were introduced in all countries. After the introduction stage came the intense period of building to relieve the housing shortage. At some point in time the focus shifts from more production to the management and improvement of the housing stock that is built. Finally comes a time when the housing policy of preceding decades is found to be too expensive, bureaucratic, market-distorting, et cetera, and parts of it are discarded and remodelled in favour of market solutions. The idea of a regime developing into maturity and then beginning to decompose is here important.

The central message in Bengtsson's and his co-authors' book is that there is no Nordic *type* of housing regime, only five different Nordic regimes. So, the regime concept in this research is not typological, but rather one that focuses on the specific constellations of housing institutions and policies in different countries. Though used frequently in the book, 'housing regime' is not explicitly defined. A clue to what a 'regime' might mean in this research is to be found in a comparative chapter of the book (Bengtsson et al. 2013: 401-436). There the regimes are classified by using two 'variables': whether housing policy is universal or selective and on what type(s) of tenure it is institutionally based (renting, owner-occupation, or both). In this specification housing regime is strictly a *policy* regime.

A focus on policy, however, misses Esping-Andersen's idea of looking at the 'big picture' (1990: 2) of welfare – in housing that means the big picture of housing provision. 'Housing provision' refers here to the process through which housing becomes available to users. It involves the promotion and financing of housing production, as well as the building, distribution, and management of housing units (Ruonavaara 1993: 34-35.). Ideal-typically three modes of housing provision can be distinguished. In *self-provision* the consumers themselves bear responsibility for the satisfaction of housing needs. In *commercial housing provision* profit-oriented market actors are responsible for the provision of housing to users. In *non-profit housing provision* housing providers operate on the principles of common good and economic gain is secondary. Real cases of housing provision represent different mixes of these modes of provision in various stages of the process of provision. This is, of course, a simplification. In reality, many different modes of provision can mix (Ruonavaara 1993: 36-37). However, when thinking of housing regimes, it makes sense to look at the configuration of roles the different actors play in the process.

Building on the previous discussion of the concept I propose that a 'housing regime' could be defined as follows:

*Housing regime* = the set of fundamental principles according to which housing provision is operating in some defined area (municipality, region, state) at a particular point in time.

By 'fundamental principles' I am not referring to rules designed by somebody but to general, recurring patterns of action that can be distinguished in the various stages of housing provision. Thinking of Clapham's neoliberal type of regime, minimal state intervention, market support,

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and privatisation can all be understood as principles of operation. The definition of a housing regime given above does not single out what variables constitute a housing regime. As in the original welfare regime model the role and nature of public-sector intervention in the housing sector, as well as the role of different types of housing provision, are surely characteristics that are central to the housing regime. However, I think that part of the answer can be left empirically open: it depends on which characteristics are fundamental. For example, in the Icelandic regime the tradition of self-building is one fundamental principle, whereas in the Swedish regime it is not – there the unitary rental market, where profit and non-profit forms or renting are linked, is one fundamental characteristic (see Bengtsson et al. 2013: 120 and 348).

Clapham ties the concept of a housing regime to the level of 'given country', which might make us think that means the level of the nation state. However, housing markets and housing policies can be regional or local – or can differ by state within a federal state system. An even smaller scale of housing regime is possible: in the early 20<sup>th</sup> century in Finland there were company towns where housing provision was largely based on employer planned and provided housing. There is no fixed level of social formation where a housing regime is necessarily located.

The model of housing-policy stages presented above highlights the historical and developing nature of housing regimes. Any description of the principles of operation of a housing provision system is time-dependent. Though housing regimes are characterised by path-dependency and in this respect are resistant to change, they nevertheless do change. In periods of change conflicting principles may in fact be in operation. Brett Christopher's well-known article (2013) in which he describes Sweden's housing regime as a 'monstrous hybrid' is about this: at the same time as Swedish housing provision is largely deregulated, the idea of introducing market rents is nevertheless still dismissed. It is clear that such a combination of principles creates tensions in housing policy.

### Conclusion

'Housing regime' is a term that is used relatively often in comparative studies of housing policies and systems. However, there is no generally accepted definition of this term. In this paper I have reconsidered this concept by scrutinising some of its previous uses. On the basis of this scrutiny I constructed a definition of a 'housing regime' that I think captures the original intuition about the word 'regime' and that is compatible with the path-dependence perspective adopted in this paper. Housing regimes are here conceptualised as the principles of operation that can be discerned in the patterns of action of the actors in the system of housing provision at a particular place and time. These principles are thought to be embodied in the institutional arrangements that relate to housing provision, in the political interventions that address housing issues, and in the discourses through which housing issues are customarily understood. The scope of this paper does not allow for a proper empirical illustration of this conception.

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