Housing Welfare Policies in Scandinavia: A Comparative Perspective on a Transition Era

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(Received December 18, 2012 / Revised April 29, 2013 / Accepted April 29, 2013)

ABSTRACT

It is commonplace to refer to the Nordic countries of Sweden, Norway, Denmark, Finland and Iceland as a distinctive and homogenous welfare regime. As far as social housing is concerned, however, the institutional heritage of the respective countries significantly frames the ways in which social housing is understood, regulated and subsidized, and, in turn, how housing regimes respond to the general challenges to the national welfare states. The paper presents a historical institutionalist approach to understanding the diversity of regime responses in the modern era characterized by increasing marketization, welfare criticism and internationalization. The aim is to provide outside readers a theoretically guided empirical insight into Scandinavian social housing policy. The paper first lines up the core of the inbuilt argument of historical institutionalism in housing policy. Secondly, it briefly introduces the distinctive ideal typical features of the five housing regimes, which reveals the first internal distinction between the universal policies of Sweden and Denmark selective policies of Iceland and Finland. The Norwegian case constitutes a transitional model from general to selective during the past quarter of a decade. The third section then concentrates on the differences between Denmark, Sweden and Norway in which social housing is, our was originally, embedded in a universal welfare policy targeting the general level of housing quality for the entire population. Differences stand out, however, between finance, ownership, regulation and governance. The historical institutional argument is, that these differences frame the way in which actors operating on the respective policy arenas can and do respond to challenges. Here, in this section we lose Norway, which de facto has come to operate in a residual manner, due to contemporary effects of the long historical heritage of home ownership. The fourth section then discusses the recent challenges of welfare criticism, internationalization and marketization to the universal models in Denmark and Sweden. Here, it is argued that the institutional differences between the Swedish model of municipal ownership and the Danish model of independent cooperative social housing associations provides different sources of resistance to the prospective dismantlement of social housing as we know it. The fifth section presents the recent Danish reform of the governance model of social housing policy in which the housing associations are conceived of as 'dialogue partners' in the local housing policy, expected to create solutions to, rather than produce problems in social housing areas. The reform testifies to the strategic ability of the Danish social housing associations to employ their historically grounded institutional relative independence of the public system.

Key words: Housing Welfare, Social Housing, Scandinavia

1. Breaking It in: Scandinavian Social Housing Policy at a Glance

Norway:

"Housing built by OBOS [Oslo Cooperative Housing Association] and other mainstream builders today is not social. There is no longer a social housing policy. But it's not a-social either. It's normal".

Sweden:

"(T)he new conditions for the Municipal Housing Corporations and the changed rules of use-value comparison represent the most far-reaching institutional transformation of the corporatist regime since 1968 (..)The critical question is(..) what happens in the long run with abolished subsidies, business-oriented Municipal Housing Corporations and a more flexible system of rent-setting²

Denmark:

"As CEO of the National Association of Social Housing, there are numerous things to be happy about in the Parliament season, which has just come to an end". 3)

From outside, it is commonplace, with reference to Esping Andersens typology of welfare capitalisms (1990), to refer to the

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Nordic countries of Finland, Iceland and particularly Sweden, Norway and Denmark as a distinctive and homogenous 'Nordic' or 'Scandinavian' model related to post war social democratic welfare state building⁴⁾.

As far as social housing is concerned, however, the institutional heritage of the respective countries significantly frames the ways in which social housing is understood, regulated and subsidized, and, in turn, how housing regimes respond to the general challenges to the national welfare states in the preceding decades and today.

The above quotes indicate that the role of social housing associations in Norway is today nonexistent; in Sweden, the impact of changes is yet to be discovered whilst in Denmark, the CEO of the interest organization of social housing celebrates the consolidated political role of social housing based on "a historically broad consensus about all important housing policy decisions, which provides the safety and stability necessary for longsighted policy solutions" 5)

This paper presents a historical institutionalist interpretation of the diversity of regime responses in the modern era characterized by increasing marketization, welfare criticism and internationalization.

The aim is to provide outside readers a theoretically informed empirical insight into contemporary Scandinavian social housing policy focusing particularly on political perception of the role of social housing in a modern welfare state. The analysis is conducted at policy level, as space does not permit to delve into the abundance of details in the respective regulatory regimes across time and national contexts.

The paper is based on a combination of comparative research into the emergence of Scandinavian housing regimes in the 20th century housing (Bengtsson et al., 2006; 2012) and an ongoing research into contemporary Danish social housing governance (Jensen, 2011).

Applying the basic distinction behind Kemeneys (1995) 'unitary' and 'dualistic' housing regimes, it is discussed to what extent, when how and why the Nordic states are moving from the former towards the latter: is the welfare state housing policy, related to the 'unitary' or 'general' regime being dismantled these years? The argument is that the historical paths, along which housing policy was institutionalized, provide different sources of resistance to deconstruction of the unitary regime.

In two countries – Iceland and Finland - the model was never unitary to begin with. The basic tenure was home ownership; the general perception equalized 'home' with 'own home' and social

housing policy consisted of loans for people to become home owners and even house builders. Hence, social housing policy was considered residual, targeting citizens unable to meet market criteria (Ruonavaara, 2006; Sveinsson, 2006; Bengtsson, 2006a).

The three remaining countries can be characterized as unitary at the outset, but along different institutional paths. In Norway, the longstanding historical home ownership tradition was carried over into the unitary model based on cooperatives of tenants, installing them in a double role of tenants and owners. This, in turn, converted Norway to a dualistic model (Annaniassen, 2006; Sørvoll, 2011). Consequently, only two unitary housing regimes continue to exist in a Scandinavian context: Sweden and Denmark. However, the further argument is that their distinctive institutional histories provide the two countries with different conditions for coping with the pressures laid on the unitary model.

The core characteristics of the Swedish model are, until recently, (I) public (municipal) control of and (II) subsidies to social housing associations and (III) tenants movement having a decisive corporatist influence on local rent levels across both public and private rental housing (IV) policy targeting a broad range of the population.

Thus, Swedish social housing associations have traditionally been potentially tangled with the market logic in three significant ways. First, subsidies privilege their market position; second, as they are public ownership, they can be privatized, should political majorities wish to do so. Further, the unique impact of the publicly owned housing associations on the general rent level across sectors allows housing associations direct influence on the profitability of private rental enterprise.

The core characteristics of Danish social housing is publicly subsidized, but - in contrast to Sweden - (I) independent, but - in contrast to Norway - (II) collectively owned - housing associations with (III) a strong tradition for internal tenant democracy at all levels and a (IV) cost dependent rent level for each housing estate, unattached to the local market of private rentals and restrictive legal limits to activities additional to construction, renewal and management of the housing stock and firm demands on re-investment of means in new housing or refurbishment. (IV) The target group is broad on top of the commitment to serve as social policy tool to social vulnerable groups, elderly and handicapped in return for the public subsidy.

The paper argues, that the historical strength of the Swedish model: the direct public integration and its unique bargaining position has become potential its Achilles heel under changing political conditions, whereas the Danish model of non-public/non private has allowed the social housing sector to navigate itself into a new position of 'equal policy partners' in the broad public housing strategy, in which housing, social and cultural integration as well as quality of governance has become the lead narrative. This, however, does not mean that the resistance potential of Danish housing associations to the general trend of 'dualization'

¹⁾ Lead cronicle in the cooperative housing magazine OBOS, issue 1:2000, quoted from Annaniassen, 2012

²⁾ Bengtsson (2012a: 15)

³⁾ http://www.bl.dk/nyheder-og-presse/nyheder/et-godt-aar-for-boligpolitikken 2012

⁴⁾ Appendix 1 displays the leading post war government compositions in Norway, Sweden and Denmark.

⁵⁾ http://www.bl.dk/nyheder-og-presse/nyheder/et-godt-aar-for-boligpolitikken

of the housing markets is infinite. The strength of the social housing movement and the sustainability of the unitary model, depends on the mobilization of tenants; the capacity to perform the new role in a proactive and influential manner and the market forces that attract more resourceful segments of the population to other tenure forms.

2, Paper Outline

The paper first briefly outlines the core argument of the historical institutionalist perspective.

Secondly the distinction between the unitary and the dualistic models is lined up together with three contemporary key challenges to the unitary model: Political criticism of the welfare state, marketization and internationalization.

It then gives a brief overview of the key characteristics of the social housing policy in the five Scandinavian countries at its 'ideal typical height' and its relation to the national traditions of welfare state thinking, before it narrows down to a focus on the three unitary regimes, Norway, Sweden and Denmark.

Subsequently, it turns to an illustration of how the challenges have imposed changes of the unitary models in those three countries and the dynamics of resistance to change built into the models.

Finally, the impact of the historical paths on the dynamics of retrenchment will be discussed in a comparative perspective

3. A Historical Institutionalist Perspective on Housing Policy

In this analysis, the historical institutionalist perspective implies, that housing policy is viewed in the light of a 'historical pattern where one event, which is more or less contingent, considerably changes the probability of subsequent alternative events or outcomes'. (Bengtsson, 2012a: 5). It situates the analysis between a structural determinism in which a path, once installed, is impossible to alter or reverse and a loose claim of 'history matters'. So in this analysis 'politics matters', in the sense that actors in the policy field do have perceptions, norms and strategies; do mobilize power and do make decisive policy choices, but in a context where already existing paths frame their opportunities and sometimes overrule them. This implies a soft lock-in mechanism based on three components: efficiency, legitimacy and power (Bengtsson, 2006a; Jensen, 2003). Consequently, a contingent event, for example a choice of problem solving on a relatively small scale by available means at a given point in time can install institutional patterns that, over time, develop into a more consolidated path. Either because it proves - or is perceived as - the most effective way to continue addressing and solving the same type of problem. Or /and because it has become taken for granted and is unlikely to be questioned or has gained strong normative support. Or/and because the solution is backed by

strong interests investing resources in sustaining it as it reinforces their position. If institutions develop into efficient and legitimate problem solving mechanisms backed by strong actors, they become strong paths over time.

Bengtsson (2012a) argues that housing policy is particularly suited for the analytical framework of historical institutionalism because of its longevity and physical sluggishness of the housing stock per se as housing estates have an average lifetime of 50 years or more; the minor and slow replacement rate; the slow impact of political measures; the high social and cultural 'attachment costs' of transfer; the considerable political significance and symbol value of chosen perceptions of fairness and the fundamental nature of housing policy as regulation of rights of exchange and possession in a capitalist economy.

Housing policy paths are not unchangeable, however. Change can occur when one or combinations of the underpinning mechanisms of efficiency, legitimacy and power are attacked frontally or undermined slowly. There are basically two routes to change: external and internal.

External influence implies both direct 'shocks' such as e.g. wars, severe economic crisis, natural catastrophes. For example, the second world war had severe impact on housing shortage and subsequently the abrupt political investments in housing policy after the peace; wars and natural catastrophes in other parts of the world leads to considerable migrations that can change the economic social and cultural conditions of social housing areas quite fast; economic crisis impacts severely on the ability of citizens to buy and rent as well as on the price of investments, loans ect for construction.

Also, modest or slower evolving forces can wear out institutions, e.g. increasing competition from other communities of perception (e.g. ideals of 'the good life' or 'way of living'); from different tenure forms or geographical/demographical changes (e.g. urbanization, ageing of population); or from mobilization opposition to the power structures on which the existing institution is based.

Internal challenges emerge when the mechanisms on which the institutional paths are built get worn out by internal contradictions or inability to provide answers to the problems, they were once installed to address. E.g, economic subsidies installed to obtain broad tenant compositions can end up as a black market, as tenants accept illegal money for their share in a housing cooperation, or governance forms installed to secure tenant influence can stall due to lack of interest among tenants.

We will now turn to a sketch of the unitary model and its contemporary challenges

4. The Unitary Model and Its Contemporary Challenges

According to Elsinga et al's elaboration of Kemeneys model, the unitary model is characterized by competition between profit and nonprofit rental sectors⁶; provision of housing to broad layers of population; market-dependent rent level and differentiation in

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nonprofit sector at a level that is lower than the market rent and limited market segmentation. In this model, sectors compete for favors of households and social housing associations seek to attract stronger strata of the population. By contrast, the dualistic model separates nonprofit from market and there is no direct competition between nonprofit and profit rental sector. The non-profit housing sector is regarded a safety net. The rent level is not market dependent and demand is by definition higher than supply. The housing market is strongly segmented referring social housing to households unable to purchase their homes (Elsinga et al., 2008).

The unitary model covers more than interference in the market. The political vision behind it has been to use housing policy as means to societal integration between different groups of citizens in terms of economy, occupation and culture and to level the life chances of different parts of the population through good basic living conditions in a broad sense. In some countries, this attempt was built in as an explicit goal from the birth of social housing policy, where special units for poor people, many children or elderly was explicitly abandoned (Indenrigsministeriet, 1945; Boligministeriet, 1987; Bengtsson, 2006:114). In other countries, the issue of 'neighborhood sustainability' or a broader view of individual life chances emerged or strengthened later, when the consequences of industrialized mass production led to social, economic and occupational segregation. Hence, the unitary model goes beyond the idea of distributional equality and builds on variations of broader idea of housing policy than mere shelter. Today, this is mirrored for example by the European Federation of Public, Cooperative & Social Housing, CECODHAS, in their response to the recent debate over state aid and EU competition rules: "For us to deliver sustainable neighborhoods, a long-term perspective and local development strategies designed together with residents is needed. To be compatible with EU competition and internal market rules, we then require recognition of our wide role (emphasis added). To provide a suitable response to the most vulnerable, giving them the same opportunities, we need, and want, to do more than provide a roof for those in need. In that context, imposing very low income ceilings as a eligibility criteria for accessing social housing constitutes a counterproductive approach and will only help to create the ghettos of tomorrow". In line with this, Bengtsson (2012) reports that even now, during the significant transformation of the Swedish housing regime discussed below, it 'is still almost impossible to find a political actor in Sweden who stands up for market rents, nor for means tested social housing'. The legitimate political ideal across the party spectrum is still a coherent society in which different types of households and citizens are integrated. The question is then, if this political ideology can be sustained in practice in the current and future context.

As argued above, historical paths can come under different kinds of pressure, of which marketization, political opposition to the unitary welfare state and internationalization stand out as relevant today.

The Norwegian case, provides an example marketization, which leads to implosion of the role of cooperatives in Norwegian unitary policy. As pointed out in Elsinga and Lind (2012) and illustrated by Annaniassen (2006) and Sørvoll (2011), non-profit rents below the market level can create queues/ over-demand, and - in the absence of strict regulation of accessibility - black markets will develop, where stronger social groups can be expected to get hold of the most attractive apartments. This wears out both internal and external legitimacy of the system due to its inability to effectively solve the task for providing housing on an equal footing for different parts of the population. This, in turn leads to a segregated housing market, where de facto, the purchasing power of tenants will become decisive for segregation of citizens, allowing wealthier and more resourceful tenants to occupy more attractive areas whilst poorer households are referred to the periphery or other solutions.

The Swedish case provides an example of mobilization of political pressure from opponents to the philosophy behind the welfare state and the unitary model and hence an attack on the legitimacy and power base of the functioning system. Most often, right or centre right governments will argue for less regulation and different shapes and forms of rolling back, downgrading or de-indexation of subsidies (Nielsen, 2010). The concern here is typically to enhance freedom of choice to individual households (Nielsen, 2012) as well as the position of private business – the argument being that subsidies create unfair competition between publicly supported and private enterprises. The first wave of criticism of the unitary model resulted in de-subsidization and privatization, notably in attractive inner city capital areas - whilst the second employed internationalization of public law (The European rules on Services of General Economic Interest -SEGI) to adjust rent-setting to get closer to market rents across sectors. This, in turn, led to a modification, but not at dismantlement of the corporatist rent setting system (Bengtsson, 2012; Elsinga and Lind, 2012).

The Danish case repeated, with some time lag, the Swedish experience, namely ideological and political pressure from an incoming Liberal-Conservative government in 2001, wishing to privatize social housing associations through conversion of the role of the citizen from tenant to owner or share holder. The historically founded model of publicly subsidized but legally independent associations made this impossible to immediately force a direct privatization through, as the property was already private. As in Sweden, this exemplifies a *power struggle between adherers and opponents to the unitary model*, but in contrast, the

⁶⁾ Elsinga and Lind (2012) remark that the framework does not include competition with the private ownership sector, which, in several cases will be decisive for the segregation processes.

⁷⁾ http://www.housingeurope.eu/policy-actions/position-papers-eu-legal-framework/state-aid

Danish model was better suited for resistance. In a protracted process, government employed a plan B of indirect privatization followed by attempts to downgrade new social housing construction. This led to vehement political counter-mobilization. Subsequently, a reform, which redefined social housing associations from objects of government steering to subjects in interactive governance processes aiming to resolve issues of sustainable neighborhoods, was passed in Parliament. However, the future strength of the social housing movements role in broad and unitary social housing policy will depend on its ability to avoid *implosion* of the mechanism that keeps up power and legitimacy of the social housing sector: tenant engagement through the sectors internal democratic recruitment and governance system.

5. The 'Scandinavian Family' and Its Development Curve

The initial observation concerning the Scandinavian housing markets is the predominance of home ownership as life style ideal and tenure form. In all countries, at least over half of the population owns their own home either as full home ownership or shareholder ownership Iceland 89%; Norway 77%; Finland 64%; Denmark around 60%; Sweden around 56% (Bengtsson et al., 2012). In Iceland, home ownership and self building remained the back bone housing policy and even in Finland, where the proportion of home ownership has decreased in recent decades, the tenure form remains the ideological and practical standard of reference. Hence, recent analysis of Finnish social housing policy remains titled: Finland - the dualist housing regime (Ruonavaara, 2006: 221; 2012).

The history of housing policy follows a parallel, even if not not simultaneous, development curve in all countries (Bengtsson et al., 2006). The *introduction phase* in the beginning of the 20th

century, where housing policy emerged as a public concern and became politicized was followed by a *construction phase* during the latter years of the WW2 and notably the decades after in which the big quantitative programs were launched and the political projects centered around provision of as many units for as low prices as possible. After the 1970s the regimes entered at *saturation phase* in which the political attention was driven towards *management* of the already built environment and the social effects of the physical structure followed by a phase marked by differing degrees and forms of *criticism and retrenchment* in which the post war housing policy ideas and their relation to welfare state policy came under pressure.

Seen through these spectacles, a historical institutionalist account of Scandinavian social housing policy digs into the mechanisms of and responses to retrenchment – i.e. the challenges to the core features of the model in its 'ideal typical' form. As the housing policy is among the most regulated sectors building on vast amounts of peculiarities and alterations, space permits no detailed account – hence the below table only provides an overview of the key features of the Scandinavian housing regimes on their 'height'. The key feature in focus of the paper is the institutionalized ideas of the raison d'être of social housing policy and its organizational forms, whilst the interference in the market: subsidies, rent control and individual allowances are seen as evidence of these, rather than treated in detail.

As mentioned, only Norway, Sweden and Denmark have historically based their housing policy on a unitary idea of housing policy backed by a political ideology defining public housing policy as a mean to provide housing to a broad range of citizens by the same means as the most vulnerable households were aided. However, the strategies through which the unitary political goal was realized in the construction phase differed in ways that became decisive of the response to subsequent

Table 1, Ideal Typical Key Features of the Scandinavian Housing Regimes on Their 'Height'

Denmark	Sweden	Norway	Finland	Iceland
(Jensen, 2006: 46)	(Bengtsson, 2006: 102)	(Annaniassen, 2006: 160)	(Ruonavaara, 2006: 219)	(Sveinsson, 2006: 279)
Collectively owned,	Universal access to publicly	Public bank loans to owner	Housing policy based on	Housing policy based on
independent, but publicly	subsidized housing.	cooperatives and individual	ownership	ownership
subsidized housing		house owners		
associations.	Municipally owned housing		Policy targeting a residual	Self building
	associations	Price regulated sector of	part of the population unable	
Universal access to		cooperatives and price	to meet market demands	State loans
subsidized housing via	Integrated renting market	regulation of subsidized		
waiting lists. Municipal	with formal links between	individual dwellings	Dualistic market between a	Significant role of unions
access to minimum 25% of	public and private		regulated and free access in	through investment of
vacancies.	rent-setting	Public access to a proportion	both rentals and owner	pension funds
		of subsidized cooperative	occupied housing.	
Significant corporatist	Corporatist Influence on rent	flats.		
influence on housing policy	levels based on strong tenant			
	movement	Public and private rentals		
Well developed tenant		with price regulation until		
democracy at all levels of		late 1960s.		
housing associations				

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challenges.

In Norway, the basic notion of home ownership informs the entire policy history (Annaniassen, 2006; Sørvoll, 2011). A de-radicalization of the Norwegian labor movement in the late 1920s led to an easing up on housing policy. Hence, from a preference for municipal ownership, the movement came to support public subsidies of owner cooperatives (Annaniassen, 2006: 173). Post war Norwegian Social Democratic housing policy was based the philosophy framed against rental housing all together. The crux was that nobody should be allowed to make money on other peoples living. And nobody should make money on living in their homes either, when selling it. The obvious solution was state loans to price regulated cooperatives, changing a 'tenant' attitude to a stake holder role. Moreover, also single houses on the country side became targets of state loans, and across the political spectrum, it was seen as desirable to nurture an ownership culture (Annaniassen, 206: 182). As a notable difference to Sweden and Denmark, the social housing associations were significantly initiated from above by the municipal administration rather than through influence of a strong tenant union or self organizing collectives (Annaniassen, 2006: 175).

Swedish tenants were strongly organized between the two world wars, as deregulation of rents led to significant rent increases in the middle of a period with unemployment and poverty. The organization around the rent level as such and tenant protection against unilateral termination of rent contracts, was to inform the formation of Swedish social housing policy for the rest of the century and onwards (Bengtsson, 2006: 108-109). In Sweden the central role of municipalities as public owners of free standing housing associations dates back to early postwar legislation in which the Norwegian model of cooperatives was also considered. However, competition between different power bases within the cooperative sectors; waning demand for ownership at the time and a wish to protect construction from business cycle swings, led to the perceived safer and more neutral municipal control of semi-detached associations, subsidized by the public and controlled by the municipalities. Municipalities were not legally obliged to establish social housing associations, but as, according to post war legislation, they were responsible for 'housing for all', de facto all larger municipalities did. (Bengtsson, 2006: 114-116).

Denmark introduced loans for municipal housing by the end of the 19th century, but political resistance in local government resulted in a weak impact. As in Norway, the labor movement changed its strategy from agitation for public housing to support for social housing associations based on the 'self help' principle, initially organized by unions or charities. However, Denmark had early experiences with subsidies to and speculative sales of entrepreneurial associations having achieved public support. Hence, as early as 1919, legislation was prepared, influenced by the newly commenced national organization of social housing associations - to draw a demarcation line between housing associations worthy and not worthy of subsidies. The legal format of the single association was monitored by the Ministry of the Interior. In order to achieve public loans, public money should stay in the association. Hence, tenants were ascribed a stakeholder / user role in the association, defined as the collective owner, consequently without individual rights to capitalize any value increase of the flat (Jensen, 2006: 64). Subsidies have changed format across history but remain in place by 2012. Early on, the single housing estate of all associations was defined as a separate unit with its own economy within the associations. Later, the estate units became political units as well, as tenant democracy was developed in the 1970s. Today, approximately 650 non-profit social housing associations exist, representing around 8000 democratically elected local housing estate boards related to the physical housing estates and legally and economically independent from other estates in the same association and other associations. By the same token local and associational political entities mobilizes a large amount of tenants in their local estate matters as well as housing policy at large (Jensen, 2011). During the 1950s and 1960 the Danish social housing movement repeatedly regretted their inability to match the Swedish level of centralization and political impact.

The organizational differences of the three housing regimes are summarized in Table 2. (Bengtsson, 2006a: 333)

The differences in organizational form stands out, as Denmark is built on associations of tenants with a strong influence on local and associational matters in strongly organized corporatist housing organizations. The municipalities, like in Norway, play the role of important environment, having only social housing associations as their policy tool when helping vulnerable groups,

Table 2, Organizational Differences of the Three Housing Regimes

	Organizational	Municipal	Housing	Tenant influence
	form	influence	organizations	
Denmark	association	Some dwellings for social	strong	Strong local influence qua participation in tenant democracy
		purposes		
Sweden	municipal	ownership	strong	Strong organized influence through centralized negotiations of rent, but weak local influence
Norway	cooperative	Some dwellings for social purposes	strong	Strong stakeholder influence on the local estate

Table 3, Historical Tenure Forms

	19	70	19	80	20	00	20	05
	owner	rental	owner	rental	owner	rental	owner	rental
Norway	69	31	73	27	77	23	77	23
Sweden	47	53	55	45	56	44	56	44
Denmark ⁸⁾	49	51	54	40	58	39	58	38

Table 4. Typology of Tenure Forms 2005

	Owne	ership		Rental	
% (rounded off)	Private ownership	Private shareholder	Social housing rental	Private Rental	Municipal Rental
Norway	63	14	3	13	4
Sweden	39	17	23	21	n/a
Denmark	51	7	19	17	1

but they have no policy- or ownership influence, like in Sweden, where the nodal points are municipal ownership balanced out by strong corporatist influence of a centralized tenant movement. The Norwegian model stands out with its construction of tenant influence through an ownership – and therefore local stakeholder role. In condensed form, the power core in the Danish regime became independent associations; in Sweden a duality of municipalities and tenant movement and in Norway the individual stake holder.

The large quantitative construction boom after WW2 up through the 1970s led to consolidation of the respective models in the three countries and tipped the balance of tenure forms (Sørvoll, 2011: 198; Bengtsson, 2006: 128; Nielsen, 2010: 47). The development of tenure forms is displayed in Table 3 and Table 4, across time and in detail for the latest comparative counting 2005 (Nielsen, 2010; Bengtsson, 2006; Statistisk Sentralbyrå, 2005).

As the construction phase moved towards the management phase, all three models experienced pressure on the price-gap between homes with different historical financing conditions. Consistently, older apartments became more attractive options than newer, regularly due to mix between price (lower historical costs and rent regulation), location (inner city) and – as criticism of the heydays of concrete deserts set in – building style.

Norway sustained a rent regulation system, which continued to aggravate the internal tensions of the model and push for marketization from tenants in order to capitalize on the increasing value of their dwelling (Annaniasssen, 2006: 198). Sweden - when discontinuing the rent regulation from the 1940s, which had been sustained for decades as housing shortage did not subside - introduced the internationally unique negotiated rent system - 'the use value system' - across publicly controlled and private rental sectors in 1968, according to which the tenants movement

negotiated the leading rent level with the municipalities, where after the level was generalized to the private rental sector in the local area. Tenants were obliged to accept the rent insofar as it 'did not significantly exceed the rent level of dwellings with equal use-value', whilst the cost and age of the dwellings should be kept aside. Cost differences can be leveled out through transfer of capital from more to less profitability (Bengtsson, 2006: 124; Lind and Elsinga, 2012; Abbas, 2002: 16). Denmark, in an attempt to equalize the costs of living in older and newer apartments, introduced a 'National Building Foundation' in 1966 where older associations pay a compensational 'fee' to a common pool which, in turn must be spent on co-financing new associational construction and refurbishment of older or worn down stock (Jørgensen, 1994: 190). Rent revenue from old housing stock with paid down mortgage, was channeled to the fund as well. Although rent gaps continued to exist, as the calculations on which the leveling proved insufficient, this model created a closed money circuit with the intention to increase the self financing component of the social housing sector.

6. Variations of Dismantlement of the Unitary Model

The Norwegian system of shareholders in price regulated cooperatives created its own pressure, which mounted increasingly, as a black market of 'money under the table' evolved. By 1982 a right wing government commenced a piecemeal process of dismantlement of the price regulating system and liberalization of the credit system. The changes implied, that cooperative flats could be sold - openly - to market prices through dissolving the cooperation (Annaniassen, 2006: 200). The changes, however ideological they were phrased, remained un-reversed by the incoming Social Democratic government in the 1990s, who became increasingly concerned about a 'well functioning housing market' and a more residual approach to social housing policy. The argument was that the historical general housing subventions

⁸⁾ Empty units of 6% in $1980;\ 4\%$ in 200 and 5% in 2005

had significantly increased the general living standards of Norwegians and that public subsidies should be allocated to the neediest whilst the rest of the population was able to make for themselves (Annaniassen, 2006: 2000; Sørvoll, 2011: 23).

As, historically, the rental sector was deemed undesirable all together and policy developed to enhance ownership for all through cooperatives, that were first subsidized - then liberalized, the present situation is a growing and unregulated private rental sector targeting households unable to meet market demands (Annaniassen, 2012; Sørvoll, 2011: 272). As displayed in the above table, only in Norway is the private rental sector the larger of the rental options, and primarily occupied by elderly, younger people, singles and single parents (Statistisk Sentralbyrå, 2005). Both Annaniassen (2006: 2012) and Sørvoll (2011) locate the driving forces behind the transformation of Norwegian social housing in the paradoxical nature of the Norwegian model of rent regulated ownership i.e. the combination of the waning efficiency of the regulated sector and the stern legitimacy of the ownership culture, rather than a 'grand attack' from the right wing government, which has been more visible in Sweden's 'system shift' in the 1990s and the Danish attempt to repeat it in the 2000s.

The Swedish retrenchment phase comes in two waves. In 1991 the incoming right wing government launched a 'system shift' in housing policy. The first wave was dismantlement of subsidies on the ideological assumption that competition and freedom of choice was the precondition for all citizens to obtain a good home at a reasonable price (Bengtsson, 2006: 140). Further, municipalities were urged to sell social housing flats as private shares or whole or part of the social housing stock to private entrepreneurs, should a political majority wish to do so. This was done to a considerable extent in inner cities, notably the capital, which has led to a local social segregation process between centre and periphery (Bengtsson, 2006: 146-47). As in Norway, the liberalization measures were not wholly reversed by the return of Social Democrats in 1994. Subsidies were not reintroduced. However, the municipal ability to sell of social housing was moderated (Bengtsson, 2012a).

Two observations are notable, however. The corporatist rent setting with a leading role of the tenant movement and municipal housing, was sustained, so far: "The government soon backed even from this position, when the National Union of Tenants launched an attack on 'market rents' and supported it with opinion polls that indicated that the majority of Swedish tenants were against the proposed changes. Eventually only minor adjustments of principled character were decided, formally weakening the monopoly position of the tenant unions, but in reality without much effect." (Bengtsson, 2012a: 10). So, in conclusion, the Swedish population was still in favor of a unitary social housing policy. The attention now turned to the lack of profitability of new constructions in the inner city, given the negotiated rent system, that kept down the local rents.

In 2006 the defeat of the Social Democrats by an alliance led by the Conservatives commenced the second wave of retrenchment. Here, general subsidies to housing construction were finally phased out; a new legislation that legalizing owner-occupation in new-built multi-family housing was introduced, and conversion from rentals to cooperative tenant-ownership was supported, notably in Stockholm, where a large number of municipal housing cooperation estates have been converted Again, however, the corporatist rent regulation regime survived and nobody took political ownership to a more dualistic model of social housing (Bengtsson, 2012a: 12).

However, by 2005, the organization of Swedish property owners had formally complained to the EU commission about unfair competition between private and municipally supported rental sectors. As public subsidies were already dismantled, the complaint was based on what Elsinga and Lind terms an 'innovative' interpretation of subsidies, namely the case where an owner (here: the municipality) 'did not demand a market based rate of return on the market value of the asset of the company' (Elsinga and Lind, 2012). The reason for the complaint was that owners were unable to capitalize on the potential market value of inner city flats in Stockholm. Per definition, then, public companies were subsidized if they did not charge prices that led to maximum profits.

Subsequently Swedish government gave a committee a directive to investigate into the relationship between Swedish law and EU competition law. A voluminous report was published in 2008 and concluded that the rent negotiation system was problematic, when public housing determined private rent, but that a negotiated system could be sustained with equal partners. Second, there were two options for the role of the municipalities: Either they should behave 'business like' as property owners and maximize profit in the long run or they could restrict their activities to a targeted population of socially vulnerable groups to whom private investors would not cater. This was literally the same message as the Dutch government received in 2005 (Elsinga and Lind, 2012).

A lengthy and complicated tactical process ensued, ending up with the subtle compromise, struck by the government; the tenants association and the property owners, that the corporatist use-value system should be sustained, but based on rent negotiations including private rents and not only municipal company rents, which, by implication, should then no longer be leading. Further, the municipal companies should be run according to business-like principles but still promote the housing provision of the municipality (Bengtsson, 2012a: 14). De facto, as pointed out by Hans Lind, the new legislation resulting from the compromise leaves room for local maneuver, when 'businesslike' and 'public purpose' is interpreted. The new law has not as yet led to a significant alignment with market rents although a trend is discernible (Elsinga and Lind, 2012). And so far no politicians are taking ownership to the idea of a full blown market rent system and a residual housing policy.

Bengtsson underlines the path dependency of the corporatist

model of strong tenant influence on policy and rent setting as well as the idea of a universal housing policy on the one hand and the marketization on the other. So far, they exist side by side. He sums up the Swedish development with reference to the mechanisms of path dependence: 'So far, at least outside the Stockholm area with its excessive housing shortage, the Swedish housing regime still appears to be largely both efficient and legitimate – at least when compared with an explicitly selective solution, (..) and its supporters still have considerable power. But if in the aftermath of the new legislation the universal and unitary regime will lose its efficiency and legitimacy the supporting actors, and not least the tenant movement, will soon lose their power as well' (Bengtsson, 2012a: 15). Lind, in his comparative assessment with Holland underlines, that the Swedish debate over internationalization of housing policy (EU competition law) has primarily concerned the difference between regulated and market rents in middle class household areas for ethnic Swedes. By the same token, the discussion has tended to ignore the situation of poorer households. As municipal housing companies become more selective towards their tenants in terms of income stability a new black market of subletting has emerged across private and municipal rentals.

The Danish retrenchment phase surfaced, but misfired, already in the 1980s, but seriously commenced in 2001, when a liberal-conservative minority government took office after 8 years of Social Democratic rule, supporting themselves on the nationalist welfare oriented Danish Peoples Party, with considerable support among former social democrats, of whom many live in social housing areas. As in the Swedish case, two waves are discernible. The first wave was almost a Tsunami, as the incoming government rushed to flash privatization of social housing as one of their primary ideological flagships and blankly refused to continue the historical path of incorporating organized interests in social housing policy making: the housing associations and the national organization of local government. The policy was launched as an outspoken break with what was seen as a social democratic regime. Now, all tenants should be allowed the opportunity to buy their dwelling, either as individual or collective share holder property and become owners, rather than parts of the political system of collective ownership within the sector. However, the policy immediately foundered on the, in constitutional terms, private status of social housing associations defined as the legal owners. So, legally, government could not enforce sales.

A longwinded political struggle between government and social housing associations and their national interest organization followed, implying a spectacular political and media campaign based mobilization of the tenant hinterland – 20% of the nation's households - against a plan B, in which individual housing estates - democratically independent departments - would be able to vote for putting themselves on the market. Also the national organization of municipalities, who depend on the

social housing associations as their primary social policy tool mounted criticism og possible segregation effects (Jensen, 2006).

Hence, two narratives of housing policy: a liberalist narrative, where limitations on the market and on the free individual choice was seen as the problem and a more social democratic narrative, where social segregation and dismantlement of organizational neighborhood structures was seen as the problem, stood against each other. In turn, the political mobilization of tenants influenced the Danish Peoples party, keen to keep support among tenants, to soften up and only support a sunset legislation of 'experimental' nature, allowing social housing estates to make decisions about voluntary sales within a defined timeframe. Expectations on the part of government were significant and outspoken, but the sales policy never gained momentum. The national organization of social housing organizations claimed, that only the association level could decide to sell itself, as they were the legal, collective owners of the property. So, as the first local housing estate made the decision to sell, the association filed a court case, which led to a protracted period of doubt about the future status of sales. Moreover, the government had overestimated the interest of tenants of converting the tenant status into an owner status per se, especially as there was no significant economic gain attached and tenants would lose the service embedded in normal social housing management. By 2009 only a total of 62 dwellings out of nigh on 600.000 were sold (Jensen, 2012).

The political implication was that government turned its attention from privatization of existing stock to limitations on future building policy. In 2003 a regulation of construction prices per square meter was issued, which tied public subsidies from local government to a restrictive price ceiling, which de facto limited the ability to build, given the price development. Later, in 2005, government decided to significantly supplant public subsidies for new constructions with money from the National Building Foundation for new construction of - primarily - housing for elderly i.e. expenditures that were normally covered by the state budget. From the perspective of social housing associations this was seen as 'milking' their capital savings and exacerbating their ability to invest in much needed housing refurbishment in areas lagging behind in housing market demand. In line with the sales policy, the social housing associations mobilized their political hinterland in a campaign pitched by the slogan 'government steals tenant money'! (Nielsen, 2012)

The open war about interpretation of the role and purpose of the fund, paved the way for a preliminary time out - starting 2006. Government decided initiate a report on the future role of social housing, including vague fantasies of copying the Dutch model of self financing social housing associations. Slowly, government started to wind down its exclusion of organized interests and invite them into the writing process, as the extent to which local social policy depends on the social housing associations became clearer, not the least because the associations began to claim

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ownership to the social role and responsibility as a key source of legitimacy. Government, local government and social housing could agree that the social housing sector should play a more 'independent' or 'self sustaining' role – but, as in the Swedish case - this Judgment of Salomon created considerable interpretational space when it came to the definition of these key concepts. Government could see it as 'end of subsidy' ala Holland; whilst social housing associations rather leaned to the idea of enhancing the market position among middle layers of the population, through accessory activities, more flexible conditions for tenants (Boligkontoret Danmark, 2007) and local government equalized 'independence' with less regulative state interference in local social housing policy development. Therefore, the debates and the report writing bifurcated into two streams finance and governance, of which the latter was considered easier to move forward without conflict. In turn, it gained increasing importance for future definition of social housing policy. During the process, the approach of the national organization of social housing associations metamorphosed from a confrontational campaign organization with strong links to the opposition to a broader defined and more pragmatic interest organization, aiming to reach favorable agreements with government. So, by 2010, both price ceilings and government use of fund money were modified, but not removed (Nielsen, 2012).

The outcome of the – eventually 3 voluminous – reports was an interpretation of 'independence' leading to a new governance regime: the dialogue steering model, implying a soft version of 'contract steering' in which local government and the local housing associations reach agreement on challenges and mutually binding policy measures in compulsory yearly meetings. In the new rulebook, social housing associations are still the main tool of local government social housing policy, as a minimum of 25% of vacancies continued to be available for social purposes. But the associations are simultaneously re-defined as co-players in local housing policy with the explicit task to counter segregation; provide housing at a reasonable price for all households in need of this and to ensure tenants democratic influence on their living conditions (Jensen, 2011).

In short, from being defined as the core problem in 2001, the social housing associations were seen as part of a solution in 2008 – by the same government. A new Social democratic government took over in 2011, and in the light of the financial crises decided to front load investments in social housing refurbishment, in agreement with the new opposition. In sum – and as quoted in the introduction - by summer 2012, the CEO of the national organization of social housing organizations could celebrate 'a good year for social housing policy'.

7. Conclusion: a Comparative Glance on a Transition Era of Scandinavian Social Housing

As the introduction indicates, the three unitary regimes are

now in three different situations due to challenges to the institutionalized housing regimes.

	Norway	Sweden	Denmark
Welfare state criticism	+	++	+
Marketization	+++	+	++
Internationalization	(+)	+++	
Implosion	+++		++

In Norway, welfare state criticism was mounted under the right wing government in the 1980s, but the dismantlement of the unitary model is not seen as a profiled external political attack on the unitary housing regime, but rather a consequence of implosion of the subsidized ownership model under the pressure of marketization. Today, the social housing policy is nonexistent and politicians find it hard to grapple with the absence of alternatives to home ownership. Even if Norway is a non-EU member, they are attached to the SEGI regulation, which is likely to lead to the conclusion that in the absence of an independent non-ownership model of cooperatives like the Danish, new non profit housing for vulnerable groups will have to be municipal housing that will fastly deteriorate and become 'second class' (Annaniassen, 2012). So it may be that the Norwegian housing policy has become dualistic by default, but politicians are not ready to make it an explicit policy. The Swedish regime came under external political and ideological pressure in the 1990s, which led to declined subsidies and an enhanced privatization policy with a significant marketization pressure on inner city dwellings, which again led property owners to activate international mechanisms to enable profitable investments. The core of the corporatist system, however, has remained effective and legitimate outside the capital area. Sweden is now in a political limbo, since on the one hand the corporatist model of influence remains considered legitimate and effective, at least outside Stockholm. And according to Elsinga and Lind (2012), local actors have considerable leverage for interpreting the new 'business like' approach of municipalities and define how it is going to be combined with the continual social concern. But it remains to be seen how new urban development will unfold with no subsidies, with a possibility of increasing market conformity in rent setting and with municipalities more keen to cater for less risky groups. Denmark is in a rather different situation, in which social housing policy moved from looking into the political abyss due to severe ideological attacks to rising into a central social policy position. Contrary to Sweden, the Danish social housing sector was not affected by the EU competition rules or commented by the commission as the Danish construction of social housing is seen as meeting the SGEI demands as - on the one hand - restrictive limitations on additional commercial activities apply, so that no criticism of cross subsidizing can be raised. On the other hand, the fact that local government is guaranteed a minimum of 25% of dwellings for citizens with specific needs; the fact that to a certain extent, disabled and families with children get prime access and the fact that there are limitations on the size of dwellings, de facto makes social housing likely to meet the needs of vulnerable groups, even if eligibility is not regulated on the basis of income. The weak spot of the Danish model is its dependence on its powerbase: the active tenants that embody the whole nervous system of its political legitimacy and force. As marketization, in the shape of competitive private ownership dwellings kick in for the more resourceful parts of social housing tenants, the political capital threatens to dry out. So it may be that the social housing sector has achieved an equal status as local policy player, but it loses power, if its constituencies weaken and legitimacy if, in the absence of active tenants, professionals in the social housing associations management teams will become the real players.

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Appendix 1

Leading Government Coalitions in Postwar Scandinavia⁹⁾

	Denmark	Sweden	Norway
1945	S, C/L	S	S
1946	C/L	S	S
1947	C/L, S	S	S
1948	S	S	S
1949	S	S	S
1950	S, C/L	S	S
1951	C/L	S	S
1952	C/L	S	S
1953	C/L, S	S	S
1954-62	S	S	S
1963	S	S	S, C/L, Ce
1964	S	S	S
1965	S	S	S, Ce
1966	S	S	Ce
1967	S	S	Ce
1968	S, Ce	S	Ce
1969	Ce	S	Ce
1970	Ce	S	Ce
1971	Ce, S	S	Ce, S
1972	S	S	S, Ce
1973	S, C/L	S	Ce, S
1974	C/L	S	S
1975	C/L, S	S	S
1976	S	S, Ce	S
1977	S	Ce	S
1978	S	Ce, C/L	S
1979	S	C/L, Ce	S
1980	S	Ce	S
1981	S	Ce	S, C/L
1982	S, C/L	Ce, S	C/L
1983	C/L	S	C/L
1984	C/L	S	C/L
1985	C/L	S	C/L
1986	C/L	S	C/L, S
1987	C/L	S	S
1988	C/L	S	S
1989	C/L	S	S, C/L
1990	C/L	S	C/L, S
1991	C/L	S, KC/L	S
1992	C/L	C/L	S
1993	C/L, S	C/L	S

1994	S	C/L, S	S
1995	S	S	S
1996	S	S	S
1997	S	S	S, Ce
1998	S	S	Ce
1999	S	S	Ce
2000	S	S	Ce, S
2001	S, C/L	S	S, Ce
2002	C/L	S	Ce
2003	C/L	S	Ce
2004	C/L	S	Ce
2005	C/L	S	Ce, S
2006	C/L	S, C/L	S
2007	C/L	C/L	S
2008	C/L	C/L	S
2009	C/L	C/L	S
2010	C/L	C/L	S
2011	C/L, S	C/L	S
2012	S	C/L	S

⁹⁾ S= Social democrats, C/L= Conservative /Liberals, Ce= Centre party, social liberals, Christian party.