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Article

Accepted Version

Ball, M. (2020) Classifying housing regimes. Is it worth doing? What are the alternatives? Critical Housing Analysis, 7 (1). pp. 36-48. ISSN 2336-2839 doi: 10.13060/23362839.2020.7.1.502 Available at https://centaur.reading.ac.uk/91274/

It is advisable to refer to the publisher's version if you intend to cite from the work. See Guidance on citing.
Published version at: https://doi.org/10.13060/23362839.2020.7.1.502
Identification Number/DOI: 10.13060/23362839.2020.7.1.502
<https://doi.org/10.13060/23362839.2020.7.1.502>

Publisher: Institute of Sociology of the Czech Academy of Sciences

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Published in *Critical Housing Analysis*
4.6.2020 | Michael Ball | Volume: 7 | Issue: 1 | Pages: 36-48 | 10.13060/23362839.2020.7.1.502

Classifying Housing Regimes. Is it worth doing? What are the alternatives?

Abstract

Comparative housing research is hindered by attempts to provide broad empirical categorisations of types of Housing Regimes and their equivalents and sweeping cross-country generalisations about their effects. Regime theory is right to recognise the housing provision is and can be organised in different ways but proselytises too strongly. Real issues and policy debates in countries are instead embedded in the existence of specific, tenure related, networks of housing provision and they widely differ across the world. Taking that on board can lead to more fruitful understandings.

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The limits of Housing Regime Theory

Housing researchers by nature are improvers and optimists. As improvers, they want housing provision to be 'better' in the 'more, please' senses of equitable, cheaper, carbon neutral, provided efficiently and fairly, etc. As optimists, they hope that better information and understanding will lead to those positive changes. Clearly, one way of conducting such investigations is to dip into scholastic tool bag and look at cross-country experiences, but when doing so the range of debates and data can seem overwhelming. Starting off with country groupings makes the task easier by a prior ordering of information and identifying of key issues, with pre-packaged solutions available. Housing Regimes are one such attempt. But do they work and is starting off with such country groupings a sensible approach? Scepticism regarding Housing Regimes theory is the argument here. It is suggested that as didactic devices they empirically foreclose analysis when it should just be beginning, because no country's institutional frameworks are the same as others and outcomes vary widely. It seems better to embrace such variety and study it as a core part of the issues at hand rather than to truncate and corral it in order to come up with all powerful but empirically weak explanatory groupings. Only a few central critical points will be made here, as a review of what is a wide literature would be overly lengthy, and the Regimes approach will be contrasted in the second half with a discussion of a country-specific institutional networks, 'Structures of Provision', approach.

Regime hinderance?

Housing Regimes broadly focus on housing policies past and present (and possibly other characteristics) to give a series of ideal types into which countries can be grouped (Allen, 2006). It is important at this early stage to emphasise that Housing Regimes in this sense have specific conceptual, causal meanings beyond the often-used terminology in which the term 'Housing Regime' is just a fuzzy, non-causal shorthand for describing how housing is delivered in a particular country along the lines of, say, 'Germany's Housing Regime puts

great emphasis on private renting whereas the US one revolves around owner occupation'; or, to take another, by referring to the 'post-socialist Housing Regime in Central and Eastern Europe'. In these cases, it is just a descriptive device based on tenure shares or common national histories. Whereas Housing Regime theory proper is an attempt to explain by a grouping of countries into Regimes, on the basis of a defined set of criteria, why housing provision takes the varied forms it does; the resultant cross-country outcomes; and frequently concluding from that analysis how countries can move through policy actions towards what are regarded as socially preferable Regimes (or, alternatively, demonstrate concern that countries' policies have moved away from them). Thus, Regimes (and variants, as terminology varies across the literature) are theoretical constructs (or 'models') applied in cross-country housing analysis. They are ideal types against which countries' actual regimes are built up from a mixture of this prior theory and empirical observation. The empirical aspects themselves are theory and belief informed.

Housing Regimes are consequently used in three combined ways: 1. as researchers' 'eyes' – what country data to look for and how to interpret it; 2. as empirical discriminators – this country is in 'x' type of regime and that one in 'y', etc.; and 3. as value-laden empirical judgements – this regime produces socially better or worse outcomes. Therefore, the question here is how useful is this approach to understanding housing provision outcomes across countries?

In the initial Regime formulations, the categories followed the precepts of Welfare Regime Theory (Esping-Andersen, 1990), focusing on the characteristics of rental housing systems (Stephens, 2016). So, Housing Regimes were based on a set of prior welfare-state focused criteria and countries are grouped on the basis of interpreting how well countries' rental housing policies conformed to those criteria. Fundamental was whether public/social housing existed and how it was set up, subsidised and regulated, particularly whether it was accessible to wide segments of the population or only meant for a few ('residualised') low-income groups. So, the comparative focus was on low-income housing provision and the values and aims posited for it within a country's welfare approach. Later, Regimes were broadened to cover wider aspects, including taking homeownership and mortgage debt levels into consideration and by recognising that welfare strategies may exist at the personal level (e.g. via extended, morally obligated, family networks) as well as directly arising from state actions (e.g. Schwartz and Seabrooke, 2008). Such developments have widened the issues and policy perspectives, though the approach as outlined above remains broadly similar. For brevity, I shall label the two, first-generation Housing Regimes (HR1) and second-generation Housing Regimes (HR2).

The number of Regime categories into which countries are put is limited. This is understandable, because too many Regimes would lose the power of the classification and the central point being made that policies determine outcomes. However, key cross-country differences are swept over in order to group countries together to achieve that parsimony. The 'policy matters' focus is clearly useful, but it is overemphasised in Regime theory because policies alone cannot determine outcomes but instead need to be put into relevant settings. Policies taken out of context do not travel well and cannot simply be assumed to be able to be applied across countries and to lead to similar outcomes. Ignored in Regime categorisations are wide country differences related to economies, finance, income levels,

social and political structures, local institutions and a host of other factors that have significant influences on both policy formulation and housing outcomes. For example, that higher income countries in Northern Europe have better housing that lower income ones in Eastern and Southern Europe is surely no surprise as incomes drive living standards, including housing consumption.

Regime theory is heavily and often unreasonably value laden. The moral objective of wanting to improve low income living standards is widely accepted, but value judgements extend deeply into analysis: via the assumed motives for agents; oft repeated views on instruments (e.g. personal debt is bad) and tenures (owner occupation as social manipulation); and in terms of the proposed means by which situations can be improved. For example, in HR1 formulations state provided, or heavily steered, housing provision is typically treated as the best outcome as exemplified by the Swedish context in the late 1960s. Experience has shown that many housing consumers, including lots of Swedish ones, would disagree.

When 'Open to all. Any place' (quasi-) state housing is treated as the best form of housing provision (Kemeny, 2006), residualisation then becomes a matter of overwhelming concern and has itself generated a large literature over many years (from Harloe, 1995, or earlier, to Borg, 2019 and later). However, other options exist to achieve the aim of alleviating poverty, which may be better and more resource efficient at achieving the desired objectives. While tackling the causes of poverty may be neglected by a focus on housing alone. For example, marginalised immigrant groups may find integration difficult for a variety of reasons and suffer persistent poverty in consequence. The 21st century growth of the gig economy has eroded certain types of workers' income security and welfare rights (Donini et al., 2017). Such underlying causes are not due to housing matters themselves. They are often likely to lead to adverse housing impacts but, nevertheless, the direction of causality is crucial.

HR2 categorisations are not that different from HR1 ones. Key differences are to look at owner occupation and housing finance as well as renting, which leads to a modest rejigging of the Regime categorisations. However, the prime concern is still to focus on whether policies towards low income housing take particular preferred forms. Single-source causality remains much in evidence. This can be seen when mortgage finance is added to the Regime mix. Forms of finance alone have been claimed to explain cross-country levels of house prices, market stability and even urban forms (c.f. Blackwell and Kohl, 2019).

Problems also arise because the criteria identifying Housing Regimes are researcher defined and then interpreted using a limited set of selected characteristics that seem to suggest common features across specific countries. Take the discussion surrounding the creation of a distinctive Southern Europe (SE) Housing Regime. The attractiveness of the characteristics identified is evident. Traditionally high homeownership rates highlight that many on low incomes live as owners, dispelling HR1 views that the tenure divides the better-off from the poor. Dual labour markets also exist across these countries, with many facing weak job security and other protections. Furthermore, many homeowners are middle aged or older and family relationship characteristics making intergenerational finance important. Allen et al. (2004) and Allen (2006) recognise diversity across southern Europe but argue for the

unity of a common southern housing group, while critical of Welfare Regimes devised on the basis of a limited set of northern countries. However, other information, such as house price changes over the past 20 years, suggests wide separation between the experiences of countries as diverse as Portugal, Spain, Italy and Greece. Moreover, similar experiences associated with the chosen characteristics exist in other places outside of this Regime region. For example, in the distinctly un-Southern European United Kingdom, 53% of owner occupiers own outright, have a similar older age profile and over a fifth of them are in the lowest income quartile (EHS, 2018). Similarly, housing related loans and financial gifts down the generations have reached a substantial scale. The so-called Bank of Mum and Dad (BoMaD as it is widely known) lent an estimated £6.3 billion in the UK in 2019 alone; part financing 260,000 purchases that year (L&G, 2019). The UK is not alone in northern Europe in these respects either.

The point is not to suggest that the UK is a good candidate for membership of a SE Regime or that its housing experiences mirror those elsewhere but, rather, that simple differentiators and broad generalisations aimed at creating a small range of distinct cross-country categories have limited credibility when subject to scrutiny. Some authors aim to counter excessive group-centred categorisations by highlighting within region housing differences but tend to do so within the Housing Regime nomenclature (e.g. chapters in Stephens & Norris, 2014; Hegedüs et al., 2018). The approach continues to have strong attraction as in attempts to distinguish Regime groupings associated with East Asian countries (Doling and Ronald, 2017) or Central and Eastern Europe (Stephens et al., 2015).

A good test of Housing Regime theory is to ask the two questions 'How good are Regimes are explaining and identifying distinct outcomes?' and 'How stable are Regime categories over time?' There have been only a limited number of statistical studies of this type. One empirical problem with cross-country research is that the definitions of variables can vary substantially internationally, even when international data-collecting bodies try to standardise them, and so can be inaccurate discriminators, as Stephens (2016) notes. However, there is a deeper issue in that no clear quantitative identification of essential elements of Housing Regimes has emerged. Nonetheless, in an interesting exercise, Dewilde (2017) identified Housing Regime clusters in Europe using a set of variables available from Eurostat data that she postulated as defining Regimes and their outcomes. What is of particular interest in her study for the argument here is that the discovered Housing Regimes (using cluster analysis) showed substantial country membership differences for the two sample years chosen and there would probably have been even more variation if further years had been included. A reasonable conclusion would be that this result is to be expected as housing outcomes are affected by a wide range of factors beyond those defined as distinguishing Housing Regimes. However, rather than questioning the efficacy of the Regime approach, she instead less convincingly defends the variability in the countries included in each cluster by reference to policy changes amongst them.

In a similar vein, Johnson and Kurzer (2020) in their introduction to a special journal issue devoted to comparative housing politics, rely on the second-generation Housing Regime format. However, in doing so, they admit that Housing Regimes have been in great flux in recent decades. Here today, gone tomorrow. What explanatory power does that leave them?

The call of institutional networks

An institutional approach is not new. After all, detailed descriptions of housing differences between countries stretch back into the nineteenth century and dominated comparative housing research up to the 1970s (Donnison, 1967). One the problem of this early work is that descriptions need some theoretical framework, which was invariably absent. The problem is amplified because 'housing theories' are indefensible, as many argue (e.g. Sommerville, 2005). Housing is a site of many interlinked issues connected to wider technical, economic and social forces. Consequently, theories used to explain the latter (derived from economics, geography, politics, etc.) are necessary for any realistic investigation of questions thrown up in the housing sphere.

Similarly, institutional analysis cannot be an overriding, catch-all, housing problem solver. To do so, would be to bottle everything up into overly simplistic explanations. There is a danger in specifying too deterministic an approach as well, as seen in many neo-Marxist perspectives (Aalbers, 2016; Aalbers & Christophers, 2014).

It is important to recognise that institutional factors tend to operate as networks in which the behaviour/influence of each element is affected by the existence and interplay of the others. Housing Regime theory does recognise networked features but limits the observation's usefulness by operating at the level of broad country groupings and particular processes. By contrast, countries tend to have distinctive institutional networks associated with particular types of housing provision. Typically, they are associated with country specific 'takes' on housing tenures, such as private renting, owner occupation and so on. Each one's institutional elements are often interrelated (e.g. in relation to a common property law). Wider institutional contexts impinge as well, such as elements of countries' financial, welfare and other sectors. There might be institutional elements in common with other countries, e.g. in mortgage finance, but the totality of those existing in any particular country usually still remains notably distinctive.

There are reasons for the persistence of distinctiveness due to a lack of international competition and trade in housing provision. In many industries, international competition is prevalent. That sets boundaries on how distinctive national firms can be from those found elsewhere and such constraints and convergence advantages form the foundation of debates over globalisation amongst other issues (Steger, 2017). However, this dynamic is absent from key parts of housing provision networks, because of factors such as housing's physical characteristics and the roles of land, location, local knowledge, politics and regulation. Together they limit, and often render non-existent, international trade in housing production, management and other provision aspects. This grounds housing provision at the local and national levels, so institutional differences across countries remain stubbornly in existence (Ball, 2003).

Investigating the consequences of housing institutions

A danger with institutional approaches is to assert that they determine outcomes in some form of Levi-Strauss type structuralism. Just specify them and, hey presto, a complete understanding for any country is readily available; policy prescriptions and all. That would be a serious mistake. Rather the effect of institutions is likely to be contingent and their influence needs to be part of the investigation of a research question, not simply its answer. To take an example from economics, there is a large literature looking at the influence of so-called 'Nimbyism' on local planning policies that lead to limits on housebuilding in America and Europe, but they have to take into account other influences on housing supply in order to examine Nimbyism's (variable) effects (c.f. Glaeser & Gyourko, 2018). As such studies show, finding out the specific influences of institutional effects is important but often not an easy task. Moreover, specifying the whole of country specific institutional contexts is usually not necessary, rather a broad understanding of them leads to hypotheses about which institutional features are likely to be important for the topic at hand; ones that then form parts of an investigation into the issues of interest.

Therefore, studying the influence of housing institutions on any questions with regard to housing provision is part of wider analyses that require theories and complex investigations. Their precise nature - theory, institutions and specific approach - depend on researcher choices and debate. This contrasts with Housing Systems theory, which categorises countries into its Housing System types that *a priori* suggest the method of study, the postulated impacts and the derived outcomes.

Structures of Housing Provision

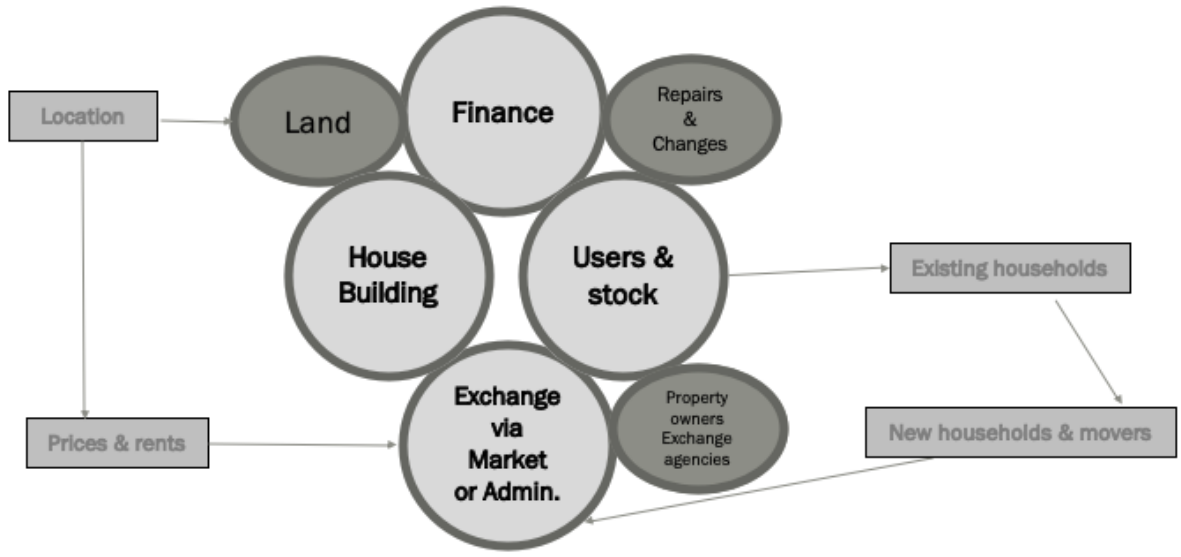
Most institutional approaches identify the fundamental factors to look at as being a set of rules (laws, property rights, informal constraints on behaviour, etc.) and their consequences for social and economic interactions. To use North's succinct metaphor, institutions are the rules by which a game is played (North, 1991). The argument here is somewhat different and so cannot be regarded as purely institutionalist on that definition. The aim is to look at networks of relations between a variety of organisations existing at a point in time in particular types of housing provision and how they behave in the contexts of prevailing rules and practices, which they themselves help to create. So, the emphasis on organisations is greater than in North's definition of institutions. Rather, than simply exploring the consequences of exogenous rules of a game, here there are rules and embedded 'organisations' - landlords, housebuilders, banks, estate agents, etc. The argument is that organisations and rules affect each. Moreover, the interplay between organisations may be co-operative, competitive or oppositional. Whichever way, organisations influence the 'game's rules, outcomes and how housing provision changes (Ball, 2006). It should be noted that this downgrades the influence of policy in comparison to Housing Regime theory, because unlike it this perspective recognises that the state is not the only entity with the power to influence events and fix the rules.

In the context of housing provision, a sensible starting point is to look at the country specific organisations and agencies involved in a particular housing tenure. Figure 1 shows a schematic general form. This diagrammatic model aims to present the basic of the S*tructures of Provision* approach (Ball, 2006), but it is a simplification and does not shown all potential interlinkages and feedback effects. The purpose is to provide a general framework

for all potential major forms of housing provision. The networks in actual forms of provision need to be empirically built up from country specific data and they are typically tenure specific. Too much emphasis should not be put on the word structure. Phrases like networks of housing provision or forms of housing provision and others are equivalent - as long as the meaning is clear.

Most people with sufficient specialist knowledge could broadly sketch out the, typically tenure focused, housing SoPs existing in their country and how they are interlinked with each other and other institutional frameworks within that country. They could more than likely do that for other countries as well, observing similarities and differences and noting that policies often lead to important differentiations. For those so inclined, a pleasant evening could be spent with colleagues, say over a meal, outlining SoP for each of the central and eastern European countries; although being comprehensive might be more difficult and raise dispute. However, that is the easy part, as noted above, because it is precise influences that matter to outcomes. Moreover, for each question only parts of SoPs are usually relevant. For instance, if there is a sudden negative demand shock, as with the Global Financial Crisis of a decade ago or the current Covid-19 disaster, does the institutional framework in question forced thousands into mortgage default and eviction or are there buffer systems and feedback effects that help to offset the shocks? The list of questions is virtually endless and, with it, so are the institutional aspects to bring in and the investigations of their effects to adopt.

Figure 1: Networks of Housing Provision: General Form



THE DIAGRAM
- Circles & ovals represent key aspects of housing provision
- They touch where there are direct relationships
- Boxes show
  - LHS: the key difference between existing & new/mover households
  - RHS: the importance of location
- Myriad of feedback loops not shown
- Common to all forms of provision

Of course, institutional networks and the organisations within them are of inherent significance in themselves. Personal interest has meant that I have spent much time studying them in different ways (via separate aspects or combined ones; single- or cross-country; etc.) from early explorations to much later ones (c.f. Ball, 1981 & 2013) and along way hopefully demonstrated that the approach - as it is an analytical framework not an answer - is useful from within widely different theoretical perspectives

Influences and importance

SoP highlight the key roles of housing users in housing provision networks, either as tenants or owner occupiers. This contrasts with Housing Regime theory, which generally treats users as the recipients of housing forms and policies. Its over-emphasis on politics, noted earlier, paradoxically frequently downplays user behaviour and gives users voices only indirectly via their voting behaviour and other forms of political engagement.

Another contrast is that the state appears in the SoP approach only in so far as it plays a direct role in a particular form of provision, say as the developer and owner of social housing. However, indirectly, it plays key roles of regulation across many spheres (e.g. land, building, markets, use and finance) and as a rule setter related to subsidies and taxation at both national and local levels. These state policies impact on SoP but alone do not constitute them.

Policy is determined within national and political processes, but policy formation and the politics surrounding it does not operate in isolation from existing networks in housing provision. Organisations and agencies within those networks have a strong influence on the nature of policy: overtly through lobbying but also by simply being there and representing key elements in housing delivery mechanisms. Their very existence (or their absence) influences the nature, ideologies and content of debates. This contrasts with Housing Regime theory which places state policies and actions as the autonomous foundation stones of Regimes: through forms of intervention which make the state the key orchestrator of outcomes.

SoP relate to dominant forms of provision in particular tenure forms. SoP interact with each, as well as the wider economic, social and political context. Elements may even cross tenure boundaries and constitute distinctive 'housing development models' within a specific SoP. Examples include when social housing institutions provide market-rented housing or build for sales to homeowners, as is commonplace in the UK; or when large-scale investors 'build-to-rent' in private renting SoPs that are dominated by small landlords.

Networks of housing provision continuously evolve but empirical study suggests that major change is uncommon. A rupture might occur because of some major political event, as in Central and Eastern Europe in the late 1980s/early 1990s, or when private land development rights were severely curtailed by the introduction of state-run planning systems across countries during the first half of the twentieth century. More generally, major change seems to be slow, as with the pre-1970s development of the many varieties of social housing in NW Europe or the distinctive evolutions across a century or more of mass

homeownership across the World. These developments are all parts of nations' housing histories, albeit in an interpretation that puts less emphasis on policies than in some histories. Importantly, longevity helps to identify what are key elements of housing institutional networks for specific countries of relevance for the issues of today. Policies may come and go: rent controls, tight restrictions on land supply and credit availability, demutualisation, social housing sales and so on. They may alter the scale, conduct and performance of a network of housing provision but often not its core elements. What aspects matter, and even what they are, depend the questions asked, the theories being adopted, and the countries investigated. The details are contingent, but the 'institutional' country specific network approach is not.

Conclusion

Argued here is the view that comparative housing research is hindered by attempts to provide broad empirical categorisations of types of Housing Regimes with sweeping generalisations about their effects. Regime theory is right to recognise the housing provision is and can be organised in different ways but proselytises too strongly. Real issues and policy debates in countries are instead embedded in the existence and ideologies of specific, tenure related, networks of housing provision and they are widely different across the world.

Adopting such a structures of provision approach is not erect an alternative theory but a methodological means through which to apply theories and analysis in ways that recognise the reality of the housing issues. Their importance to the issue at hand is contingent, depending on the questions being asked and the theories being used but in many cases they are important. It is difficult to think of many housing events that lead to precisely the same outcomes across countries. Many factors cause that variety, but institutional frameworks are often part of the explanation and aid understanding.

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