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Housing policies in Portugal and Italy: a center-periphery discussion?

Gonçalo Antunes
Centro Interdisciplinar de Ciências Sociais (CICS.NOVA)
Faculdade de Ciências Sociais e Humanas (NOVA FCSH)
https://orcid.org/0000-0002-5709-8294

Caterina Francesca Di Giovanni
Centro de Investigação e Estudos em Sociologia (CIES-ISCTE)
ISCTE-Instituto Universitário de Lisboa
https://orcid.org/0000-0002-2713-0118

Abstract

This study analyzes the housing policies enacted in the second half of the 20th century and the beginning of the 21st century in Portugal and Italy to understand whether the comparison between the two countries' housing domains reflects a divide between the "center" and the "periphery," or, on the contrary, can be observed as "between peripheries." This article stems from a comprehensive literature review on the topic, which is divided into a theoretical discourse on housing, a general European housing scenario, and a historical and contemporary framework of housing policies in Portugal and Italy. The literature review seeks to identify the economic and sociocultural singularities of the two countries through official laws and statistical data. Within a fundamentally theoretical comparative observation, this work aims to identify whether Italy and Portugal are contrasting realities within the housing domain—that is, with housing characteristics typical of the center (Italy) or the periphery (Portugal)—or represent two similar realities that integrate the peripheral context of Europe.

Keywords: Portugal, Italy, Housing policies, European Studies

Resumo

Este artigo analisa as políticas de habitação promulgadas na segunda metade do século XX e no início do século XXI em Portugal e na Itália, de modo a perceber se a comparação entre os domínios habitacionais dos dois países reflete uma divisão entre o "centro" e a "periferia" ou, pelo contrário, pode ser considerada como "entre periferias". Este artigo resulta de uma ampla revisão da literatura sobre o tema, sobre o discurso teórico sobre a habitação, o panorama geral da habitação europeia e um quadro histórico e contemporâneo das políticas habitacionais em Portugal e na Itália.

A revisão da literatura pretende identificar as singularidades económicas e socioculturais dos dois países por meio de legislações oficiais e dados estatísticos. Através de uma observação comparativa fundamentalmente teórica, este trabalho visa identificar se Itália e Portugal são realidades contrastantes no domínio da habitação, ou seja, com características habitacionais típicas do centro (Itália) ou da periferia (Portugal), ou se representam duas realidades semelhantes que integram o contexto periférico da Europa.
Palavras-chave: Portugal, Itália, Políticas habitacionais, Estudos Europeus

Introduction

The debate of the eighth annual "Europe and the World" meeting is based on the theme "Europe of the Center and the Peripheries," which pertains to the existence of a "two-speed Europe" where the "center" moves faster than the "peripheries" rather than a unified continent that moves at the same pace.

Central Europe is generally made up of countries including Germany, France, and Italy, which, together with Belgium, the Netherlands, and Luxembourg ("*Blue Banana"*), were the founders of the European Economic Community.[1] The "peripheries" in Europe refer to the southern countries, including Portugal, and Eastern Europe; these areas normally have a lower per capita gross domestic product and are subject to decisions made by the center.

However, this subdivision does not apply to all fields: firstly, Europe does not have authority in all subjects, but some economic and political options are exclusive to the national competence; secondly, some sectors overturn the idea that certain countries are always part of the center or the peripheries. Being national authority, welfare studies—and specifically housing studies—provide an example of where these subdivisions do not apply.

Starting from research already developed by the authors and based on a comparative housing analysis in Portugal and Italy,[2] the objectives of this paper are to understand the housing policies adopted in Portugal and Italy placed within a European framework and to interpret the current housing dynamics in the post 2008 crisis period to propose future perspectives.

The paper is divided into three parts: i) the general discourse of housing, viewed as a fundamental right, as a "wobbly pillar" of the welfare state, and as a specific model in Southern Europe; ii) an examination based on the main housing

1 BRUNET, Roger (dir.) - *Les villes Européenes: Rapport pour la DATAR*.

2 DI GIOVANNI, Caterina Francesca - "Social housing in Portugal and Italy: methodological issues and empirical inferences of a comparative study"; DI GIOVANNI, Caterina Francesca - "Lessons from Corviale: from the critical factors of Public Housing Plans towards a methodology for urban regeneration"; DI GIOVANNI, Caterina Francesca; ANTUNES, Gonçalo - "Housing policies beyond numbers: a comparative study in Portugal and Ital".

characteristics of the 27 European countries to identify whether the division between the center and the periphery still makes sense in the housing sector; and iii) a comparison among housing policies in Portugal and Italy, performed from both a historical and contemporary point of view through a brief genealogy of the housing policies and ending with the current problems after the 2008 crisis.

Through an analysis of publicly accessible literature and statistical data, this study aims to execute a systematic comparison of the policies of both countries to answer the following research question: are Italy and Portugal countries of the center or of the peripheries when we analyze the housing field?

The purpose of this paper is not to demonstrate which of the two countries has been more successful, but rather to understand how the countries are situated within the European framework and to learn from the comparison between the two. This approach allows to contribute theoretically to the literature of comparative housing studies in Southern Europe, which is less studied compared to Northern Europe and is often considered "a semi-peripheral region and not at the fore-front of international interest and discussion".[3]

The general discourse of housing

The "right to housing" is outlined in several international protocols, such as the Universal Declaration of Human Rights of 1948 that serves as a common ideal to be achieved by all nations. The Declaration refers to the right to housing in Article 25: "1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control."

In addition to the 1948 Declaration, the right to housing is included in the International Covenant on Economic, Social and Cultural Rights of 1966, which was signed by 170 parties, including Portugal (signed in 1976 and ratified in 1978) and Italy (signed in 1967 and ratified at 1978). It refers to housing in Article 11, which states: "1. The States Parties to the present Covenant recognize the right of everyone to an adequate standard of living for himself and his family, including adequate food, clothing and housing, and to the continuous improvement of living conditions (...)."

Along with these protocols, other international pacts denote the right to housing, such as the 1965 European Social Charter (from the Council of Europe), which was revised in 1996, and which Portugal and Italy both signed and ratified.

3 BARGELLI, Elena, HEITKAMP, Thorsten (eds.) - *New developments in Southern European Housing.*

In looking at similar legislation in the European Union, we can highlight the Charter of Fundamental Rights of the European Union, which came into effect with the Lisbon Treaty in 2009. The charter includes the right to housing in Article 34, which highlights a reducing view and relates to social exclusion, social security, and social assistance: "3. In order to combat social exclusion and poverty, the Union recognizes and respects the right to social and housing assistance so as to ensure a decent existence for all those who lack sufficient resources (...)."

Regarding national fundamental laws, there are important differences between Portugal and Italy. Contrary to Italy, the right to housing is cited in the Constitution of the Portuguese Republic (1976) in Article 65, which states that "Everyone has the right for himself and his family to have an adequately sized dwelling that provides hygienic and comfortable conditions and preserves personal and family privacy." The Portuguese Constitution not only ensures the right to housing, but it also directly refers to the support of "housing cooperatives," "local communities," and "self-construction," among other similar structures. This constitutional assurance is often viewed as progressive and avant-garde from the political perspective.[4] However, as we observe in the following sections, the promise of the right to housing in the Portuguese Constitution does not mean that housing policies have been a complete success.

In Italy, the right to housing is not explicitly stated in the Constitution of the Italian Republic (1948); for example, Article 47 only refers to the encouragement of home ownership, asserting that "(…) The Republic promotes house and farm ownership and direct and indirect shareholding in the main national enterprises through the use of private savings."

Thus, a clear distinction is made between the value placed on the right to housing in the two countries' fundamental laws: while in Portugal the right to adequate housing for families is defined, in Italy it seems that home ownership is the only form of access to housing that is promoted by the State.[5]

In recent decades, the right to housing has been identified as an important concept to guarantee decent housing to a population, especially in the context of the welfare state.[6] As Bengtsson[7] suggests, the right to housing can be understood through two interpretations: i) "selective" housing policy, in which the State takes a relatively reducing position, and ii) "universal" housing policy, in which the State assumes

4 FARHA, Leilani - *Report of the Special Rapporteur on adequate housing as a component of the right to an adequate standard of living, and on the right to non-discrimination in this context*.

5 DI GIOVANNI, Caterina Francesca; ANTUNES, Gonçalo - "Housing policies beyond numbers: a comparative study in Portugal and Italy".

6 BRATT, Rachel; STONE, Michael; HARTMAN, Chester - *A right to housing – foundation for a New Social Agenda*; JONES, Colin.; MURIE, Alan - *The right to buy: analysis and evaluation of a housing policy.*

7 BENGTSSON, Bo - "Housing as a social right: Implications for Welfare State Theory".

several policies to contribute to accessible housing. In examining the fundamental laws, we could posit that the Portuguese Constitution takes a more universal approach to housing policy and the Italian Constitution a more selective one. Nonetheless, as we will see, the intentions outlined in the fundamental laws and the policies created to achieve them do not always have a linear connection.

The right to housing is implemented within the housing policies of each country and according to the welfare state system in particular, which aims to guarantee social rights and services in health care, public education, social security, and access to housing. As opposed to other welfare fields, housing is considered the "wobbly pillar of welfare," as it is the sector with less national investment and is subordinate on the neoliberal and market logic.[8]

As we have mentioned, public action in housing can be classified as either "universal," in which the government regulates the market to allow access to housing to all income groups, or "selective," which intervenes on the poorest and most vulnerable segment of the population. These general approaches are specifically articulated through welfare regimes and systems[9] which are well explained in the most famous taxonomy of Esping-Anderson[10]. However, this taxonomy is outdated and inadequate for this study due to the fact that it is based on the study of 1980s societies and considers only quantitative parameters—namely, the relationship between the State and the market based on income maintenance systems—paying little attention to qualitative indicators and sociocultural data.

For this reason, the housing literature on Southern European countries is more in line with our study.[11] This literature describes a fourth regime for these countries in which the concept of (extended) family has a fundamental influence on housing access and production. Through the family is possible to undertake housing self-promotion linked to rural self-construction tradition in order to maintain and to protect one's own property and to provide houses for family members as well as a second home for the holidays. This policy was buoyed by the weak legal control of land use; the absence of a large sector of social policies; and the large, irregular, and informal job market, which highlights the significant difference among the overprotected and the

8 TORGESEN, Ulf - "Housing: the Wobbly Pillar under the Welfare State"; MALPASS, Peter; MURIE, Alan - *Housing policy and practice;* MULLINS, David; MURIE, Alan - *Housing policy in the UK;* LOWE, S. - *The housing debate.*

9 KEMENY, Jim - "Comparative housing and welfare: Theorising the relationship".

10 ESPING-ANDERSEN, Gosta - *The Three Worlds of Welfare Capitalism.*

11 ALLEN, Judith; BARLOW, James, LEAL, Jesús; MALOUTAS, Thomas; PADOVANI, Liliana - *Housing and welfare in Southern Europe*; ALLEN, Judith - "Welfare regimes, welfare systems and housing in Southern Europe"; BARGELLI, Elena, HEITKAMP, Thorsten (eds.) - *New developments in Southern European Housing;* BARGELLI, Elena, HEITKAMP, Thorsten; SIMÓN--MORENO, Héctor; VARELA, Carmen (eds.) - *Housing policy and tenure types in the 21st century. A Southern European Perspective.*

underprotected. Since young people are often underprotected, the family intervenes, becoming the true third actor in access to housing aside from the State and the market.

In addition to the work-home relationship, housing is in synergy with other dimensions of welfare such as the social security system. Those who own a house are able to save more for old age in the long term than those who do not, as the low pensions in these two countries would not cover the expense of renting a home. Therefore, homeownership is recognized as a secure and long-term investment for the current family economy and for old age.[12]

As stated in the introduction, comparative housing studies of the Southern European countries are less thorough compared to those of Northern Europe. In addition to the aforementioned studies, we can refer to the recent series titled "Southern European Housing"[13] and the research of Di Feliciantonio and Aalbers[14]—which is based on the correlation between the fascist-dictatorial regimes in Spain and Italy—to explain the historical roots of neoliberal housing policies and of homeownership to reinforce the social order.

Further recent studies compare Southern European countries with other developed countries from a different point of view: in fact, the purpose of the comparisons is not to identify who is "lagging behind" but to demonstrate how each country can learn from the others[15] or to explain through a theoretical lens the difference in housing systems based on the Kemeny's theory of rental systems[16].

The center and peripheries of European housing

Although the Charter of Fundamental Rights of the European Union guarantees access and rights to housing, there is no common policy for housing across Europe; instead, housing policies are considered an autonomous responsibility of the member states. This means that since the 1990s, many of the European Union structural funds have focused on holistic issues related to housing and cities, aiming to contribute to economic, social, and territorial cohesion with support for projects

12 CASTLES, Francis G.; FERRERA, Maurizio - "Home ownership and welfare: Is Southern Europe different?".

13 BARGELLI, Elena, HEITKAMP, Thorsten (eds.) - *New developments in Southern European Housing*; BIANCHI, Ranieri - *Residential tenancies and housing policy in Italy*; BARGELLI, Elena, HEITKAMP, Thorsten; SIMÓN-MORENO, Héctor; VARELA, Carmen (eds.) - *Housing policy and tenure types in the 21st century. A Southern European Perspective.*

14 DI FELICIANTONIO, Cesare; AALBERS, Manuel B. - "The Prehistories of Neoliberal Housing Policies in Italy and Spain and Their Reification in Times of Crisis".

15 VARADY, David P.; MATOS, Fátima - "Comparing public housing revitalization in a liberal and a Mediterranean society (US vs. Portugal)".

16 ALVES, Sónia - "Poles Apart? A Comparative Study of Housing Policies and Outcomes in Portugal and Denmark".

involving the revitalization and regeneration of urban spaces; the construction of collective equipment and infrastructure; and rehabilitation interventions related to energy efficiency, thermal comfort, and business models[17]. More recently, Allegra et al.[18] argue that while the European Union has no formal in the housing sector, it has influenced national housing policies. Based on the Portuguese case, the authors state that housing policies are subordinate to the European Union's urban policy agenda.

Several comparative studies on housing policies claim that a "two-speed Europe" exists.[19] Several European countries, including the founders of the European Union, took a very active role after the Second World War in the construction of public housing and support for affordable housing created by housing cooperatives and private companies. However, since the 1970s and the decline of the welfare state, these financial supports have decreased dramatically.[20] Some countries that invested more in the construction of public housing began a widespread sale of these houses, as was the case under the "right to buy" policy implemented in the United Kingdom during the Margaret Thatcher administrations.[21] To a certain extent in these cases, the State shifted from active and broad-based behavior to a neutral stance and compromised minimally with the (im)balances of the housing market.[22]

As we discuss in the following section, Portugal did not have a strong policy for public housing until 1970. Conversely, Italy actively participated in housing construction policies after the Second World War, but in the last decades of the 20th century it was one of the countries that sold the most public housing.

Currently, according to data from Housing Europe (Housing Europe 2015, 2017, 2019), the countries that have the most social housing (affordable housing in general) are the Netherlands (30%), Austria (24%), Denmark (20.9%), the United Kingdom (19%), and France (16.8%). In turn, the figures for the countries of Southern Europe are relatively similar among them: Italy (3%), Spain (2.5%), Portugal (2%), Malta (0%), Cyprus (0%), and Greece (0%). The similarity between Southern European countries

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17 GUERRA, Isabel – "Europa e políticas habitacionais – mudanças em curso"; ANTUNES, Gonçalo - *Políticas de habitação 200 anos.*

18 ALLEGRA, Marco; TULUMELLO, Simone; COLOMBO, Alessandro; FERRÃO, JOÃO - "The (hidden) role of the EU in housing policy: the Portuguese case in multi-scalar perspective".

19 ALLEN, Judith; BARLOW, James, LEAL, Jesús; MALOUTAS, Thomas; PADOVANI, Liliana - *Housing and welfare in Southern Europe;* BALCHIN, Paul (ed.) - *Housing policy: an introduction;* BALCHIN, Paul (ed.) - *Housing policy in Europe;* OXLEY, Michael; SMITH, Jacqueline - *Housing policy and rented housing in Europe.*

20 MALPASS, Peter; MURIE, Alan - *Housing policy and practice*; HUGHES, David; LOWE, Stuart - *Public sector housing law;* BULLOCK, N Nicholas - *Building the post-war world*; MULLINS, David; MURIE, Alan - *Housing policy in the UK;* LOWE, Stuart - *The housing debate;* LUND, Brian - *Housing politics in the United Kingdom.*

21 PAWSON, H.; MULLINS, David - *After council housing: britain's new social landlords*; FORREST, Ray; MURIE, Alan - *Selling the welfare state: the privatisation of public housing.*

22 BRAMLEY, Glen; MUNRO, N. G. M.; PAWSON, Hal - *Key issues in housing: policies and markets in 21st century Britain.*

can be observed not only in social housing stock but also in rates of homeownership (Italy 71.9% and Portugal 74%) and the rental market (Italy 14.8% and Portugal 17%). Although the countries of Southern Europe are commonly associated with homeownership, several countries in Eastern Europe have higher values of owner-occupied houses due to their contemporary political and economic history, as shown in Table 1.

Table 1 – Housing in Europe. Data: Housing Europe (2017)

	Owner occupied (%)	Private rent (%)	Social rent, cooperatives and similar affordable housing (%)	Other (%)
Austria	54	18	24	4
Belgium	64.8	27.8	6.5	1.2
Bulgaria	87	10.5	2.5	-
Croatia	89.4	3	1.8	5.8
Cyprus	68.6	18.8	-	12.6
Czech Republic	55.9	22.4	9.4	12.3
Denmark	49.5	28.8	20.9	-
Estonia	82	7.3	1.7	9
Finland	64	19	13	4
France	57.9	23	16.8	2.4
Germany	45.4	50.7	3.9	-
Greece	73.9	20.8	-	5.3
Hungary	92	4	4	
Ireland	67.6	20.6	8.7	3.1
Italy	**71.9**	**14.8**	**3.7**	**9.6**
Latvia	80.9	19.1	-	-
Lithuania	89.4	10.6	-	-
Luxemburg	73.2	21.7	5.1	-
Malta	76.45	19.86	-	2.75
Netherlands	60	10	30	-
Poland	75.4	0.8	23.8	-
Portugal	**74**	**17**	**2**	**7**
Romania	98.2	-	1.8	0.3
Slovakia	90.5	3	6.5	-
Slovenia	77	3	6	14
Spain	77.1	13.8	2.5	6.5
Sweden	62	19	19	-
United Kingdom	63.1	19	17.6	-

As noted by BRAGA, Michela; PALVARINI, Pietro, 2013, p.9, "[t]aking the share of social rental stock as a percentage of total housing stock as a crude indicator indicates that Netherlands, Austria and Denmark have the highest incidence (...) compared to the EU average (8.3%), whereas Eastern and Mediterranean countries have stocks of social housing below 5% of the total, and Greece and Latvia none at all."

Italy and Portugal: past and current housing models

As stated in the previous section, Portugal and Italy are very similar in their "housing numbers"; specifically, both exhibit low percentages of social housing stock and rented houses and a high percentage of homeownership. These characteristics confirmed the welfare regime of Southern European countries—discussed in the first section—in which family plays an important role while the State encourages mortgages and tax relief for access to homeownership.

However, two countries with similar "housing numbers" may still differ in certain characteristics that become recognizable with an in-depth case study analysis. Specifically, through our case study we identify some relevant differences by analyzing past and current events.

According to Tulumello et al.[23], instead of following a linear and taxonomic approach, a genealogical perspective allows us to analyze the main sociopolitical dynamics of events. Therefore, the historical comparison between Italy and Portugal is subsequently developed through a brief genealogy of housing policies defined as occurring before the 2008 crisis or after the 2008 crisis.

Historical path until 2008 crisis

The history of housing policies in Italy and Portugal can be traced back to the beginning of the 20th century to the demand for workers' housing and their poor housing conditions.

The first Italian provisions can be traced back to 1903 with the creation of the public body for social housing (*Istituto Case Popolari*) and 1919 with the first law for the "*Edilizia popolare ed economica"* (economic and popular houses). In Portugal, the timeline is nearly contemporaneous, as the first law for the construction of "*Casas Económicas*" (economic houses) was introduced in 1918, which included, for the first time, the definition of social housing. In the early years of the 20th century in Italy and during the First Portuguese Republic (1910-1926), the housing policies created did not alleviate the existing housing problems.

After the end of the First World War and throughout the 1920s, the rise of nationalism occurred across Europe: a fascist dictatorship began in Italy in 1922 and in Portugal in 1926. This period was characterized by the manifestation of power in all its forms and the housing policies served to support the dictatorship itself, as the houses were mainly allotted to the lower-middle classes of workers in the regimes.

While the housing situation was fairly similar in the two countries during the first decades of the 20th century, the second post-war period brought about notable differences. Portugal did not participate in the Second World War, and this factor, together with the extension of its dictatorship, comprises its main dissimilarity with Italy in historical, political, and cultural terms of housing. The dictatorship in Italy ended with the conclusion of the Second World War, and its democratic republic was consequently established in 1946. Meanwhile, the Portuguese dictatorship continued

23 TULUMELLO, Simone; FERREIRA, Ana Caterina; COLOMBO, Alessandro; ALLEGRA, Marco; DI GIOVANNI, Caterina Francesca - "Comparative planning and housing studies beyond taxonomy: a genealogy of the special program for rehousing (Portugal)".

until 1974. Thus, after the Second World War, Italy began a path to democracy, to an open market, and to economic integration with other Western European countries; all of these factors, supported with the Marshall Plan. On the other hand, as Portugal as left behind in the sealed dictatorship that would only end in the 1970s.

The Italian post-war period was characterized by the establishment of the democratic republic, by the physical and economic reconstruction, and by strong demand for housing due to the extensive migration from the countryside to the cities because of job growth. In this period, a series of instruments were approved, thus representing the "golden age" of the State investment in housing: the INA-CASA plan in 1949, whose architectural choices were used as examples throughout Europe; the PEEP (*Piano di Edilizia Economica e Popolare*) in 1962, which expropriated areas for the construction of a large public housing neighborhoods[24]; and the GESCAL fund (*GEStione CAse per i Lavoratori*) in 1963, intended to guarantee a steady stream of money designated for public housing construction.

Although the construction of houses increased dramatically, the public stock was quickly lost due to policies of privatization, alienation, and homeownership purchase. According to Balchin[25], "a total of 800,000 social-rented dwellings were built between 1951 and 1970 and 850,000 dwellings were privatized in the social sector in the same period." The 1970s and 1980s were characterized by the decentralization of authority from the state level to the regional level; this movement included the housing sector and resulted in the first signs of the decline of public housing. According to Padovani[26], 1980 marked a turning point for the decline—in opposition to the three previous decades—in the number of new houses built, the decrease in withdrawals from the housing stocks, and the statistical increase of second homes. This period of neoliberal policies began in the 1980s and increased in the 1990s through the regeneration policies that coordinated initiatives and public and private investments; the privatization and alienation of public housing; and the abolition of the GESCAL fund in 1998, and thus of the only cash flow that guaranteed a continuous investment in housing at national level.

At the beginning of the 2000s, the long process of decentralization that had begun in the 1970s finally ended. This time period also saw the reform of IACPs and, after years of inaction, a revival of housing policies due to the significant rise in housing prices and the slow growth of household incomes.[27]

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24 DI GIOVANNI, Caterina Francesca - "Lessons from Corviale: from the critical factors of Public Housing Plans towards a methodology for urban regeneration".

25 BALCHIN, Paul (ed.) - *Housing policy in Europe*, p.159.

26 *Idem*, p.205-207.

27 BALDINI, Massimo - *La casa degli italiani.*

During the dictatorship in Portugal, several housing policies were implemented (such as "*casas económicas*," "*casas renda económica*," and "*casas de renda limitada*," among others); however, these types of housing policies were corporatist, and the programs were mainly aimed at the middle class with the intention of supporting the regime itself, leaving the poorest populations unprotected.[28] The post-revolution period (1974–1976) brought about experiments which, although developed in a short time, produced progressive and direct participation policies that are utilized as examples in the present day (as in the case of *Serviço de Apoio Ambulatório Local)*.[29]

Between 1976 and 1986, Portugal went through a period of "democratic normalization" until it joined the European Economic Community. During this period, housing policies were largely incoherent and produced no visible practical results.[30] After 1986, the year in which Portugal entered the European Economic Community, housing policies stabilized until the end of the 20th century. Table 2 shows the total State expenditure between 1987 and 2011, which is the period between Portugal entering the European Economic Community and the beginning of the Troika's financial program.

Table 2 – Allocations executed in the Budgets 1987–2011. Resolution of the Council of Ministers No. 48/2015.

Instrument	Executed	
	Amount (€)	%
Home loan interest subsidies	7 046 685 145	73.3
Rehousing programmes	1 353 426 012	14.1
Incentives to let	803 874 566	8.4
Building renovation programmes	166 594 609	1.7
Social Security rent benefit	29 223 491	0.3
Direct action programmes	193 944 373	2
Housing Development Contracts	13 868 736	0.1
Total for housing policies	**9 607 616 934**	

The data illustrates that the home loan interest subsidy consumed 73% of the public effort in the housing sector; this was the most important instrument used by successive governments to guarantee the constitutional right to housing. This kind of

28 SERRA, Nuno - *Estado, território e estratégias de habitação*; ANTUNES, Gonçalo; SOARES, Nuno Pires; JULIÃO, Rui Pedro; LÚCIO, José - "Políticas de habitação social precedentes a Abril de 1974"; ANTUNES, G. - *Políticas de habitação 200 anos.*

29 PORTAS, Nuno – "O processo SAAL: entre o Estado e o poder local"; CEREZALES, Diego - *O poder caiu na rua – crise de Estado e acções colectivas na revolução portuguesa 1974-1975;* BANDEIRINHA, José - *O processo SAAL e a Arquitectura no 25 de Abril de 1974;* PINTO, Pedro - *Lisbon rising: urban social movements in the portuguese revolution - 1974–75;* ANTUNES, Gonçalo - "Política de habitação social em Portugal: de 1974 à actualidade".

30 FERREIRA, António Fonseca - *Por uma nova política de habitação*; FERREIRA, António Fonseca - *Livro branco sobre a política da habitação em Portugal;* SILVA, Carlos Nunes - *Política urbana em Lisboa: 1926-1974;* SERRA, Nuno - *Estado, território e estratégias de habitação;* ANTUNES, Gonçalo - *Políticas de habitação 200 anos;* ANTUNES, Gonçalo - *"Política de habitação social em Portugal: de 1974 à actualidade".*

instrument is created with the middle class in mind, helping that target group have access to homeownership.

Table 2 also shows the social housing programs only used 16.4%, allocating 16.1% to public rehousing programs and 0.1% to controlled-cost housing programs (supporting housing cooperatives and private companies). This indicates that in this period, the State preferred to directly support Portuguese families (with home loan interest subsidies) rather than invest in social housing.

In terms of rehousing programs, the most important was the *Programa Especial de Realojamento* (Special Program for Rehousing), created in 1993 for the metropolitan areas of Lisbon and Porto. The Special Program for Rehousing was the most striking rehousing program in the history of housing in Portugal; it allowed rehousing for the population that lived in slums, building around 35,000 public dwellings.[31] Several authors also suggest[32] that the nation's entry into the European Economic Community was a decisive factor in the creation of a large-scale program for the demolition of slums in the Portuguese metropolitan areas. As previously stated, the Special Program for Rehousing allowed for the construction of around 35,000 dwellings, which were owned by the municipalities. The public housing stock built in the 1990s brought new challenges for Portuguese municipalities, particularly regarding the management of the buildings and population and because many of the new public housing neighborhoods had a high concentration of low-income populations.

After 2008 crisis and current issues

Because housing policy has been neglected over the past two decades in Italy, the 2008 crisis worsened an already-critical housing scenario, further weakening the sector. In 2008, a new policy package was implemented with the aim of creating an integrated system of real estate funds with public and private capitals. Private and non-profit operators started to build social housing projects at the local level, although the results were almost irrelevant nationally and were only concentrated in some regions. Since one of the relevant consequences of the crisis was evictions for people who lost their jobs, a national fund for innocent defaulting tenants was

31 CACHADO, Rita- "O Programa Especial de Realojamento – ambiente histórico, político e social"; ANTUNES, Gonçalo - *Políticas de habitação 200 anos*; ANTUNES, G. - "Política de habitação social em Portugal: de 1974 à actualidade"; TULUMELLO, Simone; FERREIRA, Ana Caterina; COLOMBO, Alessandro; ALLEGRA, Marco; DI GIOVANNI, Caterina Francesca - "Comparative planning and housing studies beyond taxonomy: a genealogy of the special program for rehousing (Portugal)".

32 SERRA, Nuno - *Estado, território e estratégias de habitação*; ANTUNES, Gonçalo - *Políticas de habitação 200 anos*; ANTUNES, Gonçalo - "Política de habitação social em Portugal: de 1974 à actualidade".

created in 2013 to support households in the process of being evicted for arrears, especially in large municipalities with housing problems[33]

In 2016, the FEDERCASA (*Federazione Italiana per le Case Popolari e l'Edilizia Sociale*, or Italian Federation for Popular Houses and Social Housing) noted that the public stock in Italy corresponds to about 760,000 dwellings, distributed unevenly between Northern, Central, and Southern Italy, as the majority is owned in the north (44% of the entire stock). According to Baldini and Poggio[34], the current public housing situation is dramatic, and it is close to collapse. As demonstrated in Table 3, the state expenditure for housing policies is extremely low: less than 1% of the total expenditure was allotted to housing between 2014 and 2017. With scarce state investment in housing, the regions and municipalities were left alone to struggle with an increased demand for housing and an ancient public stock that needed to be restored.

Table 3 – Italy State Expenditure on housing (% of GDP)

Instrument	(mln €)			
	2014	**2015**	**2016**	**2017**
Various funds for housing renovation, rental houses, innocent defaulting tenants, loans for buying first home, etc.	405,54	418,95	424,95	150,22
Tax deductions for energy efficient	1.993,00	1.989,00	2.151,00	2.112,00
Tax deductions for building renovation	12,965,00	11.030,00	12.464,99	12.391,00
Total housing policy resources	15.093,54	13.437,95	15.039,95	14.635,22
GDP	1.621.827,20	1.652.085,40	1.689.747,60	1.724.954,50
Housing policy resources/GDP (%)	**0,93**	**0,81**	**0,89**	**0,85**

Source: FEDERCASA.

After the Troika's intervention ended in 2014, the Portuguese housing market changed significantly. In summary, in 2012, changes were made to the legislation of the urban rental market, which liberalized the market and facilitated evictions.[35] At the same time, the growth of urban tourism and short-term rentals created a new scenario in the center of metropolitan areas.[36] In addition, there was an increase in the interest that Lisbon and Porto aroused in international real estate markets and investors. The combination of these factors, among others, made access to housing very elusive in the center of metropolitan areas, leading to changes in the social fab-

33 BALDINI, Massimo; POGGIO, Teresio - "The Italian housing system and the global financial crisis"; POGGIO, Teresio; BOREIKO, Dmitri - "Social housing in Italy: old problems, older vices, and some new virtues?"; BIANCHI, Ranieri - *Residential tenancies and housing policy in Italy.*

34 BALDINI, Massimo; POGGIO, Teresio - "The Italian housing system and the global financial crisis".

35 ANTUNES, Gonçalo - "O arrendamento em Portugal desde meados do século XIX: pequena síntese".

36 RIO FERNANDES, José; CHAMUSCA, Pedro; MENDES, Thiago; CARVALHO, Luís - *O Porto e a Airbnb*; RIO FERNANDES, José; CHAMUSCA, Pedro; MENDES, Thiago; CARVALHO, Luís - *A Airbnb em Portugal*; RIO FERNANDES, José; CHAMUSCA, Pedro; MENDES, Thiago; CARVALHO, Luís; GAGO, Ana – *Lisboa e a Airbnb.*

ric of the regions.[37] Some authors associate this process with the financialization of housing and the gentrification processes that are taking place not only in Portugal but throughout Europe.[38] In 2017, a State Secretariat for Housing was created to politically answer to the growing pressure in the real estate market. This State Secretariat was established at the end of the same year as the *Nova Geração de Políticas de Habitação* (New Generation of Housing Policies), which is a package of reformist housing policies. Since then, new housing policies have been created between 2018 and 2019, namely new rehousing policies (*Primeiro Direito* and *Porta de Entrada*) and instruments to support the household's access to the rental market (*Programa de Arrendamento Acessível*). However, given their recency, the practical results have not yet been observed. In 2018, the *Instituto da Habitação e Reabilitação Urbana* (Housing and Urban Renewal Institute) presented the "*Levantamento nacional das necessidades de realojamento habitacional"* (national survey of rehousing needs). This survey identified 25,762 families living in "patently unsatisfactory situations," especially concentrated in the metropolitan areas of Lisbon (54%) and Porto (20%).

Currently, the public housing stock in Portugal corresponds to 120,000 units belonging to municipalities, autonomous regions (Azores and Madeira), and the central government; they house around 113,000 households and 270,000 individuals (2.5% of the Portuguese population). The 120,000 public housing units represent 2% of the national housing stock.[39]

Conclusion and future perspectives

The right to housing has earned prominence in the second half of the 20th century, as it has been included in international charters and protocols, in national fundamental laws, and as part of the welfare state. However, international literature has been questioning why the right to housing is absent from the discussion on the welfare state, unlike social policies on health and education.[40] Although housing is a vital part of human dignity and survival, there is no consensus on its integration into the typical measures of the welfare state, even in the countries that have invested the most in this domain.[41]

37 SEIXAS, João; ANTUNES, Gonçalo - "Tendências recentes de segregação habitacional na Área Metropolitana de Lisboa".

38 SANTOS, Ana Cordeiro - "Financeirização do Estado, política de habitação e subsídios à especulação"; SANTOS, Ana Cordeiro (coord.) - *A nova questão da habitação em Portugal*; MENDES, Luís - "Gentrificacao, financeirizacao e producao capitalista do espaco urbano".

39 INE - *Inquérito anual à habitação social*.

40 LOWE, Stuart - *The housing debate*.

41 MALPASS, Peter; MURIE, Alan - *Housing policy and practice*; MULLINS, David; MURIE, Alan - *Housing policy in the UK*; LOWE, S. - *The housing debate*.

In this work, we intended to demonstrate that, in examining housing policies, it is not possible to draw a clear division between the "center" and the "periphery" in the cases of Portugal and Italy. On the contrary, with the analysis, it's possible to observe a "between peripheries" scenario.

Italy is frequently analyzed as a central country in Europe, having been one of the founders of the European Union and having led the process of democratization after the Second World War. As we have observed, it was also one of the countries that invested the most in the construction of public housing called "*Trente Glorieuses*." However, in the following decades, the housing policies adopted followed a path of neoliberalization, with the alienation of a substantial part of the public housing stock, the liberalization of the housing market, and minimal intervention by the State.[42]

The history of housing in Portugal followed a different path, but the results are relatively similar from a quantitative point of view. In Portugal until 1974, the public housing policies experience was marked by the corporatist model; throughout the dictatorship and during the democratic period, housing policies did not have a long-term strategy. The most significant support of the State was for the purchase of a home, which stemmed from a neoliberal perspective of market provision, banks, and real estate investors. The construction of substantial public housing only occurred in the 1990s. At the same time, recent studies claim that housing policies in Portugal have undergone a liberalization trend in the last decades, specifically after Portugal joined the European Economic Community in 1986 and later during the last Troika intervention.[43]

Currently, Italy and Portugal present very similar statistical data in regard to (low) public housing stock, (low) rental markets, (high) homeownership, and (high) rates of second homeownership, among other related indicators. However, this evolution followed distinct timeframes, as we emphasized in this article. Although the two countries maintain very different courses of action in their housing policies[44], the result appears to be similar. Even today, these different approaches are visible from an institutional perspective: while Italian housing policies are generally managed at

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42 BALDINI, Massimo - *La casa degli italiani*; BALDINI, Massimo; POGGIO, Teresio - "The Italian housing system and the global financial crisis"; BIANCHI, Ranieri - *Residential tenancies and housing policy in Italy*; POGGIO, Teresio; BOREIKO, Dmitri - "Social housing in Italy: old problems, older vices, and some new virtues?".

43 MENDES, Luís - "Gentrificacao, financeirizacao e producao capitalista do espaco urbano"; SANTOS, Ana Cordeiro (coord.) - *A nova questão da habitação em Portugal*; ANTUNES, Gonçalo - *Políticas de habitação 200 anos*; ANTUNES, Gonçalo- "Política de habitação social em Portugal: de 1974 à actualidade"; ANTUNES, Gonçalo - "O arrendamento em Portugal desde meados do século XIX: pequena síntese»; SEIXAS, João; ANTUNES, Gonçalo - "Tendências recentes de segregação habitacional na Área Metropolitana de Lisboa".

44 DI GIOVANNI, Caterina Francesca - "Social housing in Portugal and Italy: methodological issues and empirical inferences of a comparative study"; DI GIOVANNI, Caterina Francesca; ANTUNES, Gonçalo - "Housing policies beyond numbers: a comparative study in Portugal and Italy"; ANTUNES, Gonçalo; DI GIOVANNI, Caterina Francesca - "As políticas de habitação no Sul da Europa. Comparando Portugal e Itália".

the regional level, in Portugal the responsibilities are allocated to the municipalities (there are no administrative regions in Portugal).

More recently, the COVID-19 pandemic has thrown the housing market into uncertainty, largely because the changes that occurred between 2014 and 2020 in Portugal and Italy were based on foreign investment and the growth of urban tourism. The pandemic has brought new challenges to societies and housing policies. In the future, it would be valuable to have a holistic view of the right to housing, urban spaces, and the right to the city, which enhances the quality of life and decent housing conditions for all.

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