Affordable cooperative housing. An international typology, supportive institutions and public policies

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ABSTRACT: In many contemporary societies and urban areas, affordable housing (housing at a socioeconomically affordable price for either rental or purchase) is increasingly necessary to counterbalance the negative effects of rising level of private property housing and speculative prices of housing, and therefore to reduce general socioeconomic inequalities. This paper explores the potential for cooperative housing to fulfil this social function and to be an effective solution for housing provision. Based on a review of the global diversity of cooperative housing, two broad types of socially oriented housing cooperatives are identified, according to their relation to profit with their corresponding logics: a) contextualized profit-seeking (social-civil logic); and b) non-profit-seeking (civil-public logic). These two types are illustrated with representative national, regional and local examples. Whereas the latter clearly aligns with the features of affordable housing, the former, given its complex nature, is the object of a thorough empirical discussion to determine the institutional conditions that can help it be socioeconomically affordable. In the selected cases the analysis identifies the institutional factors and public policies that have fostered the emergence and development of accessible cooperative housing. The article thus suggests and discusses the policies and institutional developments to support the affordability of cooperative housing.

KEYWORDS: Housing systems, public policies, housing commons, cooperatives, urban policies.

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RESUMEN: En muchas sociedades y zonas urbanas contemporáneas, la vivienda asequible (vivienda a un precio socioeconómicamente asequible, ya sea para alquiler o para compra) es cada vez más necesaria para contrarrestar los efectos negativos del aumento de la vivienda privada, y de los precios especulativos de la vivienda y para reducir las desigualdades socioeconómicas. Este documento explora el potencial de las cooperativas de viviendas para cumplir esta función social. A partir de una revisión de la diversidad global de las cooperativas de vivienda, se identifican dos grandes tipos de cooperativas de vivienda con orientación social, según su relación con el beneficio con sus lógicas correspondientes. a) búsqueda contextualizada de beneficios (lógica social-civil); y b) sin búsqueda del lucro (lógica civil-pública). Estos tipos se ilustran con ejemplos nacionales y locales representativos. Mientras el segundo tipo se ajusta claramente a las características de la vivienda asequible, el primer tipo, dada su compleja naturaleza, es objeto de un profundo debate empírico para determinar las condiciones institucionales que pueden contribuir a que sea socioeconómicamente asequible. En los casos seleccionados, el análisis identifica los factores institucionales y de políticas públicas que han promovido el surgimiento y el desarrollo de vivienda cooperativa asequible. El artículo sugiere y discute los necesarios desarrollos institucionales y de políticas públicas para apoyar la asequibilidad de la vivienda cooperativa.

PALABRAS CLAVE: Sistemas de vivienda, políticas públicas, bienes comunes de vivienda, cooperativas, políticas urbanas.

Resumen amplio

Vivienda cooperativa asequible. Una tipología internacional, instituciones de apoyo y políticas públicas

Objetivos

La vivienda es uno de los principales problemas socioeconómicos en muchos países, con sociedades crecientemente urbanizadas y con economías cada vez más basadas en el patrimonio, tanto de bienes inmuebles o físicos como de bienes financieros. La vivienda, aunque figura como un derecho ciudadano en muchas constituciones políticas y democráticas, sin embargo, en la práctica, ha tendido a funcionar bajo las complejas y desiguales condiciones y lógicas de mercado, con una tendencia estructural al aumento de las prácticas especulativas, acentuada en las últimas décadas en muchos países. La solución a este problema es el aumento cuantitativo de la vivienda asequible, definida como cualquier forma digna de hogar económica y socialmente accesible para la mayoría de la ciudadanía.

La vivienda cooperativa ha tenido históricamente una dimensión dual y ambivalente. Por una parte, en la medida en que ha sido una forma de propiedad o copropiedad ha participado de las lógicas patrimonialistas y de mercado. Pero, por otra parte, en la medida en que ha promovido la copropiedad o propiedad compartida, pero manteniendo mecanismos de accesibilidad económica y social, ha sido y es una solución de vivienda asequible. En el desarrollo de esta segunda dimensión social y colectiva es clave el papel y la actuación de las instituciones públicas y políticas democráticas, en colaboración con las diferentes organizaciones sectoriales de la sociedad civil.

El objetivo de la investigación ha sido conocer en detalle las diferentes experiencias locales de cooperativa de vivienda asequible dentro de los contextos institucionales en sus respectivos países. Tras identificar un conjunto de ejemplos locales y nacionales se ha procedido a construir una tipología, con el objetivo de facilitar su conocimiento y su comparación. Para comprimir ocho realidades diferentes en unas pocas categorías inclusivas se ha aplicado el criterio dicotómico de la existencia o no de búsqueda del beneficio en una lógica de mercado. De esta manera se han propuesto dos grandes categorías de vivienda cooperativa asequible: a) la que la búsqueda del beneficio de mercado depende de las regulaciones y marcos institucionales nacionales y locales; y b) la que no presenta una búsqueda de beneficio por las regulaciones públicas que establecen una función pública a la cooperativa de vivienda. Finalmente, en base a la importancia de las instituciones públicas y civiles se realiza una serie de recomendaciones de políticas públicas para la promoción de la vivienda cooperativa asequible.

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Diseño / Metodología / Aproximación

La metodología utilizada ha sido principalmente cualitativa en base a breves estudios de caso comparables, debido a la existencia de dos problemas con relación a los datos: a) la falta de estadísticas internacionales coherentes y válidas, debido a las diferencias en el registro y contabilidad del fenómeno de la vivienda cooperativa y social; la definición y categoría de vivienda cooperativa presenta una alta diversidad y variación entre países, incluso en un entorno de integración regional como el de la Unión Europea; b) una alta heterogeneidad institucional respecto a regulaciones, leyes, y ordenamientos públicos tanto sobre vivienda y específicamente sobre vivienda cooperativa como sobre el concepto de vivienda asequible tradicionalmente también denominada vivienda social en muchos países.

Por lo tanto, una vez analizados los datos estadísticos existentes con un mínimo de validez se han identificado los casos cuantitativa y cualitativamente más significativos, sobre los que se ha realizado un breve estudio de cada caso. Los estudios específicos se han basado en el conocimiento publicado, y en datos secundarios y públicos, y en la medida de lo posible en información en los idiomas locales o nacionales.

La selección de los ocho casos responde a un criterio de relevancia cuantitativa (porcentaje de vivienda cooperativa en el stock de vivienda total nacional o local), y cualitativa (su orientación social y abierta, y el carácter de asequibilidad de la vivienda cooperativa). El hecho de que los ocho casos sean de países europeos y americanos no responde a ningún sesgo epistémico o metodológico. Esta localización geográfica de los casos seleccionados es entendible en base a la diferente evolución del cooperativismo en el mundo, según su contexto macrorregional y nacional.

Resultados / Limitaciones a la investigación / Implicaciones

Desde el marco teórico para la comparación y en base a las características de los ocho casos analizados se han propuesto dos grandes tipos de vivienda cooperativa asequible o de orientación social.

El tipo que presenta una búsqueda contextualizada de beneficios, fundamentado en una lógica social-civil. En este tipo se han analizado los casos de dos países nórdicos (Suecia y Dinamarca) y el de Nueva York en los Estados Unidos de América. Dinamarca y Suecia, desde unas tradiciones similares de vivienda cooperativa de orientación social se han ido diferenciando a medida que han ido cambiando las leyes y las regulaciones. En Suecia, la vivienda cooperativa ha adoptado de forma creciente la lógica del mercado y de la vivienda privada. En Dinamarca, donde la vivienda cooperativa está altamente concentrada en el área de la capital Copenhague, algunos factores socioculturales y civiles del cooperativismo junto a factores políticos han mantenido una base regulativa que ha dado a las asociaciones de viviendas cooperativas la posibilidad de mantener su orientación social y de asequibilidad. El caso de Nueva York presenta igualmente fuertes presiones hacia la lógica privada y especulativa, pero al mismo tiempo se observa la pervivencia de las posibilidades de coordinación público-civil para mantener la orientación social de las viviendas cooperativas. En estos casos queda evidente la importancia de dos aspectos: a) el régimen institucional de bienestar: los desarrollados Estados de Bienestar nórdicos o escandinavos ofrecen mecanismos para atenuar los efectos negativos de los mercados especulativos de la vivienda, así como una combinación de soluciones de vivienda asequible; b) las instituciones públicas locales y la cooperación público-civil en los contextos urbanos locales.

El otro tipo de vivienda cooperativa asequible es el que no presenta una búsqueda del lucro o el beneficio, fundamentado en una lógica civil-pública y con una regulación pública que establece la función pública de la cooperativa de vivienda. En este contexto se incluyen los casos de Uruguay, Canadá (Quebec), Austria, Suiza y Alemania. Si bien las diferentes dinámicas nacionales no presentan una clara dinámica positiva, es en el ámbito regional, subnacional o local (ciudad o área urbana) donde se han dado los desarrollos más dinámicos y positivos. Esto se debe al alto nivel de descentralización de las políticas de vivienda y urbanas al ámbito local. En el caso de Uruguay, centrado en el caso de su capital Montevideo, se observa la ambivalente influencia de la política y la ideología en la regulación y promoción del cooperativismo de vivienda de orientación social. En el caso de Quebec en Canadá destaca el creciente debate sobre la posibilidad de introducir lógicas de mercado en la regulación de las cooperativas de vivienda. En los tres países europeos de cultura germana, en las últimas décadas han tenido lugar interesantes iniciativas locales de vivienda social asequible de naturaleza cooperativa. Así se puede observar en los casos de las ciudades de Viena en Austria, de Zurich en Suiza, así como en el emergente caso del *Mietshäuser Syndikat* (*apartment house syndicate* o sindicato/asociación de apartamentos), que actualiza organizativamente la tradición urbana de vivienda alternativa por parte de algunos sectores de la juventud.

El contraste analítico entre ocho casos nacionales o subnacionales no es quizá una suficiente muestra para hacer conclusiones generales, pero el conocimiento cualitativo y evolutivo de esos casos, agrupados en las dos grandes categorías propuestas, ofrece un suficiente conocimiento sobre la naturaleza real y potencial de la vivienda cooperativa asequible, y por lo tanto suficiente para hacer recomendaciones de políticas públicas.

Conclusiones prácticas y valor original

Desde el estudio comparado de ocho casos relativamente positivos, histórica o actualmente, se pueden concluir tres conclusiones prácticas. Una primera conclusión práctica es que la vivienda cooperativa asequible puede y debe ser parte de un sistema o régimen de vivienda equilibrado y justo; la copropiedad de vivienda puede contribuir a aumentar la asequibilidad socioeconómica en los regímenes de vivienda, y por ese motivo se considera que debe ser parte de las soluciones a la actual crisis de vivienda en nuestras sociedades. Una segunda conclusión práctica es la importancia del contexto subnacional o local para el desarrollo de la vivienda cooperativa asequible dentro de las políticas urbanas. Un empoderamiento legal, competencial y financiero de las instituciones públicas locales puede considerarse como una condición para el desarrollo de sistemas locales de vivienda asequible. Una tercera conclusión práctica es la importancia de la intervención pública y democrática en los mercados o regímenes de vivienda; la cual debe basarse en una honesta colaboración con los grupos de la sociedad civil interesados y dispuestos a cogenerar diferentes formas de vivienda asequible.

El valor original del estudio reside en dos aspectos. Primero, por su carácter comparado, ya que no suele ser fácil la comparación de dinámicas y experiencias de cooperativismo o economía social; asimismo, la importante dimensión local hace necesario mantener un equilibrio entre factores nacionales y dinámicas locales. Segundo, el artículo trata sobre un problema central y relevante, y crecientemente preocupante, en nuestras sociedades actuales.

1. Introduction: housing cooperatives between the capitalist market and public provision

Housing has predominantly been established as a private good, increasingly subjected to market value dynamics and decreasing economic affordability. Market relations, governed by the conventional regulations and laws of capitalist economies, often reflect structural inequalities and asymmetries in power and information. Among the values or functions of a commodity in modern capitalist societies (use, exchange, and symbol, as per Beckert & Aspers, 2011), housing, beyond its function of use, has: a) taken on a significant exchange function, becoming a vehicle for speculation amid increasing urbanisation, the rise of tourism (Etxezarreta-Etxarri et al., 2020), and the growing number of overnight stays; b) gained symbolic value, encompassing factors such as type of housing, location, social status, and family cultural norms. In summary, housing ownership—an essential commodity in expanding urban areas—has become a central element in patrimonial dynamics and accumulation under neoliberal capitalism. Ensuring affordable and secure housing is a key objective of Sustainable Development Goal 11.1 outlined by the United Nations.

To counteract this trend, the concept of affordable housing has been proposed, characterised by two defining elements or criteria: a) economic affordability, where prices should generally be below those of the private housing market and accessible to the vast majority of society based on average income levels; b) social accessibility, where allocation should follow equitable, inclusive, and socially cohesive criteria. The two main types of affordable housing are publicly owned housing managed by local or municipal governments, and social housing provided by civil associations in collaboration with public institutions. The predominant model is rental housing, with or without an option to purchase. In a broader perspective, other forms of affordable housing in the private market include regulated rental housing (e.g., with fair contractual terms and caps on rent increases) and regulated home purchases (e.g., with rules to make mortgage credit less risky).

Cooperative housing, historically with a clear social orientation, can also fulfil the two criteria of affordability (Ahedo et al., 2021). What exactly is cooperative housing? Amid the great diversity of cooperative housing models worldwide, three main types can be identified. A first distinction is made between building cooperatives (where housing typically becomes private property once construction is completed) and user cooperatives. Within the latter, there are two variations: a) *shared co-ownership* between the cooperative member and the cooperative (also known as *tenures or co-ownership cooperatives*). These can be further divided into two types: *limited equity and market equity*, depending on whether the ownership share can be sold at a publicly regulated or market price; b) *rental cooperatives*, where members pay rent to the cooperative, which is typically regulated by public rental policies. The most controversial type is the limited or market equity cooperative, as it allows for the possibility of profit through the sale of shares, potentially reducing economic affordability. To examine this reality and potential, the concept of socially oriented or affordable cooperative housing is used. Cooperative housing is categorised as *housing commons*, which is closely linked to the *decommodification* of housing. This category emphasizes collective or common ownership, often employing innovative legal and organisational frameworks. One of the most notable examples is the *Mietshäuser Syndikat (Apartment House Syndicate)*, an initiative which originated in Germany and is now spreading across Europe.

In the global context, the *Cooperative Housing International* association promotes the social orientation of cooperative housing[1]. In Europe, *Housing Europe (the European Federation of Public, Cooperative & Social Housing)*[2], established in 1988, encompasses 45 national and regional federations. As of 2023, it represents around 25 million homes, accounting for 11% of Europe's existing housing stock. While comprehensive statistics are difficult due to the various forms and definitions of cooperative housing, focusing on user cooperative housing (both in tenure and rental forms), it is estimated that approximately 3% of Europe's population lives in this type of housing. Percentages vary significantly: around 10% or more in Nordic countries (Sweden, Denmark, and Norway), 2–5% in Switzerland and Uruguay, and 0–1% in countries such as Canada, the United States, Austria, Germany, and Southern European countries.

The paper is structured as follows. Section 2 discusses the analytical framework based on a broad social theory of the economy and the state. Section 3 provides an empirical typology for understanding affordable cooperative housing. Section 4 presents and discusses various institutions, policies, and public regulations aimed at promoting affordable cooperative housing. Sections 5 and 6 examine the following two types of cooperative housing with a minimum level of affordability: with contextualized profit options, and without profit options. Each type includes representative national or local cases, highlighting the policies and institutions that support their affordability. The final section offers conclusions and some research proposals.

2. Housing, cooperativism, the state, and institutions: socially oriented and affordable cooperative housing

In modern capitalist societies, public housing emerged alongside the process of massive urbanisation during industrialisation. This rise of public housing has not eliminated the fact that housing has primarily been treated as a privately owned commodity, with corresponding rights of sale and rental in the market. Housing represents a special case within neoliberal

1. According to data from Cooperative Housing International, a section of the International Cooperative Association (ICA). https://www.housinginternational.coop (last access 11/12/2024).

2. https://www.housingeurope.eu/ (last access 11/12/2024).

capitalism. In recent decades, real estate ownership (housing, etc.) has become one of the cornerstones of asset-based capitalism, which has generated new inequalities. Bourdieu (2000) offered a critical analysis of the housing market, highlighting how political, cultural, and symbolic factors inflate prices and drive speculation. He also noted the growing role of international actors, all within the framework of hegemonic neoliberal economic thought.

Cooperativism, in its form of collective co-ownership of goods, services, and productive organisations, is a form of social economy, and partly also of solidarity economy (Bance & Schoenmaeckers, 2021); it is a relevant organisational form in the functioning of commons or shared goods (Ostrom, 1990; Guttmann, 2021) and is a significant phenomenon for analysing the dynamics of internal solidarity (among cooperative members) and external solidarity (with society as a whole) (Sørvoll & Bengtsson, 2019). Within cooperative principles and ideology, the pursuit of profit or financial gain is a complex issue. Modern capitalist economies are based on the axiom of the right and practice of seeking profit in the market. Cooperatives represent a form of economic ownership situated midway between private property (with the freedom to seek profit) and public property (theoretically not for profit), as well as non-profit organisations. Cooperatives and co-ownership organisations operate in an ambiguous space within the category of social economy or the third sector (Salamon and Sokolowski, 2016). In theory, they do not usually have legal limits on seeking profits to be distributed among their co-owners. In practice, the cooperative philosophy promotes profit without human or social costs, and the tradition is to reinvest profits into collective goods and resources. Within dominant legal frameworks, it is the bylaws and internal decision-making practices of cooperatives that establish the limits of profit and the relationship between internal and external solidarity.

What is the relationship between the state and cooperatives? Cooperativism with shared ownership lies between the modern dichotomy of the two dominant logics: private and public. Within this dichotomy, for the contemporary state, promoting cooperativism and the social-solidarity economy is challenging due to the prevailing legal framework. In practice, cooperativism has fostered the decision-making participation of its members and the distribution of profits, as well as solidarity with local environments. In our time, given the structural and social deficits of current capitalism, the state can and should promote socially oriented cooperativism as an effective alternative to the capitalist market, from basic and general laws on the social economy, cooperative associations, etc., to financial support of creation of socially oriented cooperatives.

With respect to housing cooperatives, Ganapati (2010) argued the importance of a virtuous embedded autonomy in state-cooperatives relations and of supportive structures (effective collective action organisations for shared resources) to explain the different evolution that housing cooperatives took in the second part of the 21st century in three countries: almost no development (0.5% of the housing stock) in the United States (disembeddedness), low growth (10%) in India (overembeddedness), while high growth (18%) in Sweden (embedded autonomy and strong supporting organisations). Ganapati did not address the tenure nature of the Swedish housing cooperatives, and their commodification pattern, which have led to them becoming less socially affordable. How can embedded autonomy be balanced with a lack or limitation of commodification of housing cooperatives? Which policies and regulations could help housing cooperatives to balance the internal and the external solidarities? How do the cooperative members decide rent prices, the value of a cooperative dwelling, and the ways to participate in the cooperatives? Section 3 proposes public policies which facilitate external solidarity from internal solidarity.

3. A synthetic international typology, with an applied orientation

Comparative studies have linked housing systems or regimes with welfare and capitalism (Ansell, 2014; Blackwell & Kohl, 2018; Grander & Stephens, 2023), finding significant institutional differences. Through this, the significance of factors and the institutional context is recognised, usually at nation-state level, and in the case of housing, also at regional and local levels. However, our goal is to propose a general typology that transcends the contingent national institutional logics based on specific historical, cultural, or social factors. It is assumed that there are no insurmountable barriers to create and develop affordable housing cooperatives. All that is needed is a minimum standard of democracy and a culture that strives for equality and social justice. The stronger the democratic culture and social equality, the smoother the processes to develop this type of housing.

Given the high diversity of cooperative housing worldwide, a comparison based on conventional categories or typologies is often complicated and confusing. There have been some classificatory efforts. The organisation *Cooperative Housing International*[3] proposes six categories: non-profit rental, ownership (equity), limited (market) equity, mutual aid, mutual home ownership, and right to use, and identifies some representative countries. However, a more operational and substantive typology is considered necessary, focusing on possible public policy actions. From a temporal perspective, there are two types: a) construction cooperatives, where the completed housing later becomes private property; and b) use cooperatives. In the second type, there are rental cooperatives and co-ownership cooperatives. This distinction allows for identifying two main orientations regarding profit: a) contextualized profit-seeking; and b) non-profit seeking (Table 1). In the contextualized profit-seeking type, if there are no limitations on the pursuit of profit, its relationship with profit will be marked by a social-civil decision-making logic: a) social, in the social practice of cooperatives in their corresponding institutional contexts; and b) civil (or civil-institutional), in the national and local institutional context, with its economic and civic culture, housing system, and housing-related public policies, such as labour policies, etc. Three different cases are presented: the United States, and two Nordic cases (Sweden and Denmark). In the non-profit seeking type, regulations prohibit or limit the pursuit of profit decisions regarding rental prices, etc., respond to a public-civil

3. https://www.housinginternational.coop/sdgs-2/cooperative-housing-models/ (last access 11/12/2024).

logic within their national or local context, which depends on the public and civic culture, regulations, and government actions. From a broad perspective, the cases of Uruguay, Canada, Austria, Switzerland, and Germany are presented and discussed.

Table 1. The two main types of socially oriented cooperative housing

	Contextualized profit seeking	Non-profit seeking
Main type	Tenure, ownership or equity cooperatives	Rental cooperatives (non-equity)
Main logic of decision	Social-civil logic	Public-civil logic
Institutional factors for their social orientation	Economic and civic culture, housing system, various public policies	Public and civic culture, regulations, housing policies
Representative countries	United States of America, Sweden, Denmark	Uruguay, Canada, Austria, Switzerland, Germany

Source: Compiled by the authors.

The main empirical sources for the selected cases are: a) academic and scientific publications, especially case studies of specific countries or qualitative comparisons between a few countries (cited in each case); b) studies focused on comparison, such as the publication by Baiges et al. (2020), which includes 10 cases[4], and the thesis by Merino (2024); and c) quantitative data, primarily from the EU[5] and the OECD[6], as well as qualitative and quantitative information, both direct and indirect, from the websites of the organisations *Housing Europe* and *Cooperative Housing International*.

In the selection of representative cases, there is a clear overrepresentation of Europe. European countries, due to historical reasons, have a long tradition of cooperativism in general and in housing. Europe is heterogeneous, with significant differences in the conventional categories or groups of countries (Southern Europe or Mediterranean, Nordic countries, German- and French-speaking Central Europe, the Anglo-Saxon or Anglophone region, and Eastern Europe) regarding housing policies and systems, financial and credit systems, labour markets, spatial-urban regimes, etc. There are also internal differences within each group. According to Kováts & Kohl (2024), in post-socialist Eastern Europe, northern countries maintained a larger social and cooperative housing sector until the late 2010s compared to southern countries (Hungary, Bulgaria, Romania): in terms of housing stock, cooperatives represented 15%

4. Germany, Austria, Denmark, Lazio (Italy), New York (USA), Netherlands, Quebec (Canada), United Kingdom, Switzerland and Uruguay.

5. https://ec.europa.eu/eurostat/web/interactive-publications/housing-2023 (last access 11/12/2024).

6. https://www.oecd.org/content/oecd/en/data/datasets/oecd-affordable-housing-database.html in Poland, 10% in the Czech Republic, and 6% in Slovakia, but by 2022, these percentages had decreased to less than 3%. In the Global South or developing countries, Ganapati (2014), in line with the 2010 analysis, finds the slow growth of cooperative housing and emphasizes two limiting institutional factors: the lack of embedded autonomy in state-cooperatives relations, and the absence of supporting structures and organisations as organised civil collective action providing resources and goods.

4. Public policies to support affordable cooperative housing

Public support is important for affordable cooperative housing. Ferreri & Vidal (2022) propose a *public-cooperative nexus* between public institutions and cooperatives (either individual or with a federation or association), emphasizing three stages or processes: production or creation, access and management, and maintenance and sustainability of the model. Building on the proposal by Ferreri and Vidal, Table 2 and 3 present public policies to support and promote affordable cooperative housing, differentiating two areas: a) general policies with institutional foundations; and b) specific policies for its emergence and maintenance.

Table 2. General policies and institutional foundations to support affordable cooperative housing

General housing policies	Land; construction; use / occupation; complementary relation of tenure forms; urban planning; fiscal and financial aid programmes, etc.
Multilevel and complementary policies	· At national, regional and local levels; empowerment of municipal governments · A comprehensive approach via laws, regulations, support and aids, standards, public information, etc.
Collaborative embedded autonomy	· State-cooperatives relations, where the state grants permission and support to civil initiatives, integrating them into a broader social function.
Collective goods organisations	· To empower second-level cooperatives, federations, etc. · To promote social economy and third sector

Source: Compiled by the authors.

This public policy proposal differs from the one by Ferreri and Vidal in two ways. First, these authors include certain types of conventional social housing, both civil (housing associations) and public; we focus specifically on cooperatives, with particular attention to co-ownership cooperatives (equity cooperatives). Second, their view of the government's role is primarily one of hard regulation, with a limiting, controlling, and constraining approach to conditions and decision-making options; our perspective also includes soft regulation, with empowering and enabling actions, within a pro-civic state approach where the government provides comprehensive support using various forms and tools. Our proposal emphasizes the institutional context and enabling institutions.

Table 3. Specific policies to construct and maintain affordable cooperative housing

Construction of the model	
Production	· Access to land and buildings · Financing · Subsidies (direct and indirect) · Technical support
Access and management	· To regulate access to prevent exclusivism and to keep the sector open · Subsidies to maintain affordability via aid to vulnerable groups
Maintenance of the model	
Institutional regulations	· To restrict housing equity and commodification · To contextualize or limit the possibility of profit · To condition other parties to capitalise on exchange value
Institutional enabling	· To encourage cooperatives' public and social orientation. · Tools and instruments to facilitate cooperatives' external solidarity

Source: Compiled by the authors.

5. Contextualized profit seeking: local institutions and welfare states

This type of cooperative includes the possibility of using cooperative property as a commodity in the market and thus of obtaining a profit. The institutional context guides or frames the social and civil practices of profit-seeking and the maintenance or non-maintenance of cooperative housing at affordable levels, through regulations, laws, and public policies. In the United States of America, local public institutions have significant power to act, promote, and regulate. In the cases of Denmark and Sweden, housing cooperatives are part of a general housing regime that includes other minimally affordable housing options within their developed welfare states.

5.1. United States of America (USA): a flexible utilitarianism with local institutional dynamics[7]

In the USA, the most common form of tenure is private ownership (63% of homes), followed by 35% private rental and 1% public rental. According to Housing International, in 2018, community and socially oriented cooperatives accounted for 0.7% of the housing stock (approximately 1.5-2 million people), although in some cities this percentage was clearly higher. Housing cooperatives throughout the 20th century have served as an affordable alternative (Sazama, 2000), and in the 1960s and 1970s, they were developed through federal programmes. With neoliberalism in the 1980s and 1990s, they transitioned into the Third Sector, with varying dynamics depending on the state and city. Currently, there are 6,400 cooperatives with 1.2 million homes, divided into two main types: 775,000 at market price and 425,000 with limited equity. These two traditional types are increasingly blurred and mixed, but they still indicate the different relation of cooperatives with market logics. Market-priced cooperatives, considered corporations or Limited Equity Cooperatives, are concentrated in certain urban areas, such as New York (Manhattan), which is why it is often referred to as the "Manhattan model." According to Ganapati (2010), in New York City in 2000, about 75-80% of the housing stock was under this type of cooperative ownership. Private investors have participated in these cooperatives due to the lower tax burden on stock transfers (2-3% compared to 7-10%) and to avoid inheritance taxes.

Limited equity housing cooperatives (social and community-oriented) have also developed in urban areas such as New York, Chicago, Atlanta, Detroit, Miami, Kansas City, Washington and San Francisco. They have been sponsored by trade unions, immigrant support organisations, non-profit entities, etc., aiming to prevent speculation and promote long-term residency, and are targeted at low- and middle-income families. Most limited equity cooperatives have received financial support, which can take three forms: a) lower interest rates offered by federal financing programmes and state housing authorities; b) rental assistance for individual owners based on income[8], primarily from local government and private sponsors; c) tax incentives. The share of cooperative members is sold according to a formula established in the cooperative's bylaws that limits the profit rate. This formula is usually based on the original cost of the share, increased by an annual percentage based on inflation, the value of improvements, and the repayment of capital.

New York City has an interesting history of supporting local policies, despite the strong profit orientation in the housing market. In the 1970s, when national authorities began converting public rental housing into condominiums and cooperatives, more than 70% of these conversions to cooperatives were in New York. Limited Equity Cooperatives (LEC) grew in the city in response to landlord abandonment of rental property in the 1970s. The city council transferred ownership of these buildings to resident tenants through LECs under its Tenant

7. The main academic references are Sazama (2000), and Ganapati (2010).

8. https://www.housinginternational.coop/co-ops/united-states-of-america/ (last access 11/12/2024).

Interim Lease (TIL) programme. New York is also home to one of the largest housing cooperatives worldwide: Co-op City[9], in the Bronx district's northeast. Construction began in 1966 and finished in 1973, promoted by the United Housing Foundation and financed by the Mortgage Agency of New York. The New York case illustrates how local public institutions can foster socially oriented housing cooperatives while also enabling the growth of market-driven and profit-focused cooperatives[10]. The city has implemented programmes to convert public housing buildings into cooperatives, as well as providing mortgage assistance for distressed properties and their transfer to housing cooperatives. It highlights the significance of local contexts within higher political and administrative levels.

5.2. Sweden: middle-class cooperativism in a social democratic welfare state[11]

Cooperative housing currently accounts for 23% of the housing stock (compared to 10-12% in the 1980s), alongside 40-41% private housing, 19% public rental housing managed by municipalities, and 17-18% private rental housing. In Sweden, there are hardly any civil associations for social rental housing. Cooperative housing is integrated into two federations: HSB (independent and with a civil tradition) and Riksförbund (linked to the trade union movement and focused on construction). After the abolition of regulated pricing in cooperatives in 1968, the two cooperative traditions participated in the growing market logic, where co-owners could make a profit from selling their shares. Sørvoll and Bengtsson (2018a) emphasize two dynamics: a) the priority of individual interest over collective interest and welfare, both within the cooperative and in relation to the rest of society; and b) competition and growth, when cooperatives decide to expand into new spaces within the housing system and market. These mechanisms, along with the lack of public regulation of prices, have favoured the autonomy of cooperatives, a loss of solidarity with non-members and society in general, and thus a process of commodification.

This commodification can be contextualized by considering some institutional factors. First, organisationally, both HSB and Riksförbund have developed economies of scale and, in fact, maintenance costs are generally lower than in private housing. HSB offers financial advantages, e.g., a person on the waiting list can use their monthly payments to enter the cooperative. Second, the socioeconomic system, led by the welfare state with a strong focus on municipal public housing, reduces the economic burden of housing on society. Swedish society, like Danish society, does not tend to perceive the cost of housing as a heavy burden. From an international perspective, the Swedish model, according to Ganapati (2010), suggests a model of a strong

9. https://www.housinginternational.coop/resources/coop-city-the-largest-housing-cooperative-in-the-bronx (last access 11/12/2024).

10. "All kinds of discrimination: Inside the secretive world of New York Housing Coops" www.theguardian.com/lifeandstyle/2022/feb/08/

11. The main academic references are Ganapati (2010), and Sørvol & Bengtsonn (2018a).

cooperative housing sector that can participate in the market, as opposed to a weak cooperative housing sector, controlled by the state or marginalised by economic and financial forces. The Swedish case illustrates the sector's autonomy and the strength of its collective organisations.

5.3. Denmark: an urban and pragmatic cooperativism in a pro-civic state[12]

In Denmark, cooperative housing currently represents approximately 8% of the housing stock, alongside 50% private housing, 20% social rental housing (civil housing associations), 18% private rental housing, and 2% public housing. In Copenhagen, cooperative housing accounts for 30% of the housing stock. In the Danish model of cooperative housing developed in the 1970s, based on the *andel*, or share/equity of part of the value of the home, the co-ownership association owns the building and the housing. The *andel* is open to being bought and sold, and its value depends solely on the limits set by the co-ownership association at its annual meeting. Cooperative housing has received support and promotion from public institutions. In 1975, the government prohibited the horizontal division of properties for sale and, in 1976, the law allowing the conversion of rental housing into cooperatives was approved, with a minimum of 60% of tenants required to participate. There are three main groups: a) the traditional ones (70%) from before 1981, where tenants bought apartments and established themselves as a cooperative association; b) the publicly supported ones (21%), established with indexed public loans between 1981 and 2004 until 1998 when these loans, which had fixed rates at 4.85%, became problematic when credit rates later decreased; and c) the non-supported ones (9%), typically new constructions after 2004. Since 2010, the growth of housing cooperatives has somewhat slowed down: by 2022, those created after 2015 made up only 3.5% of all existing cooperatives. A minimum affordability has been based on: a) a maximum price: a formula sets the maximum legal price of the share, part of the formula including the apartment's valuation with two main references or standards (public valuation by the government, and private valuation); b) open waiting lists, though with internal priority criteria where, traditionally, external waiting lists with low fees have coexisted with internal criteria to prioritise cooperative members and family members, etc., in the sales of the *andel*. About 55-60% of housing cooperatives belong to the Danish federation of housing cooperatives (ABF), created in 1974.

A key issue has been the process of co*mmodification*. Sørvoll & Bengtsson (2018b) and Larsen (2024) criticise the shift away from decommodification through a political process of deregulation, especially since 2001. In the early 1980s, during conservative-led governments, the price regulation on co-operative shares was made stricter; it legally bound sellers of co-operative shares to act in accordance with the ideal of external solidarity. In 2001, however, the liberal-led government deregulated price-setting and pushed housing cooperatives to accept increases in their prices. In 2005, the parliament voted against practices of speculative sales and kept some regulations, but by that time most cooperative owners had already adopted the

12. The main academic references are Sørvoll & Bengtsson (2018b); Ahedo et al. (2021); and Larsen (2024).

highest valuation for their dwelling. Until 2007, prices grew at the same rate as private housing, and even higher in central Copenhagen. Nevertheless, there has not been full deregulation of the price-setting of housing cooperatives, as the legal maximum price is still in effect.

Despite this, a deeper contextual analysis sheds light on the potential for Danish housing cooperatives to update the preconditions to maintain socioeconomic affordability in the speculative urban context. Ahedo et al. (2021) and Larsen (2024) point to two factors to manage decommodification: state regulations, and management and decisional practices by the cooperatives. These can be observed in the latest official data which indicate the following[13]. First, the cooperatives still have heterogeneous social composition. According to a report in 2022 by the leftist think-tank CEVEA, individuals occupying cooperative housing after 2012[14] represent a socioeconomically intermediate group between those living in private dwellings and those in the rental sector. Second, there has been a decrease in the number of cooperatives using the public valuation from 2012 to determine the maximum price: 2015 (60%), 2018 (33%), and 2023 (12%), with a corresponding increase in private valuations. However, the new public valuation from December 2023 is expected to reverse this tendency. Third, price increases in the cooperative sector have been lower than average: from 2015 to 2023 prices grew 26%, whereas prices in the homeownership sector increased by 32% (one-family house) and 41% (own private dwelling). Fourth, in the 2014-2017 period, the cooperative sector's average actual price was 90% of the maximum price calculated using the formula with public valuation.

State regulations and institutions are crucial. For example, the obligation to offer the tenants the possibility to buy the building to become a cooperative has been protected, although this regulation has been under attack by private investors. Likewise, the public housing valuation is an important guideline for housing cooperatives to decide annually the value of their dwelling. Unfortunately, the lack of regular updates of these valuations has led many cooperatives to seek private evaluations, which often result in more profit-oriented decisions. The most recent valuation was published in December 2023, and despite technical failures, ABF encourages its use as a price-setting guideline. Currently, the broad political centre-left has a positive view of the cooperative sector, and it has tried to support it to maintain a minimum standard of affordability. The new Housing Ministry, since 2019, has increased its focus on housing cooperatives, offering information and enacting regulations to encourage socially responsible autonomous practices[15]. In February 2024, the government announced plans to establish clearer principles for price-setting by cooperatives, while making the public valuation more central. In relation to coming housing policies ABF is working to establish new regulatory and financial support schemes, especially involving more collaboration with municipal authorities[16]. The

13. https://www.dst.dk/da/Statistik/dokumentation/statistikdokumentation/andelsboligsalg (last access 11/12/2024).

14. https://cevea.dk/wp-content/uploads/2022/04/Andelsboliger-er-fortsat-en-mellemvej-mellem-ejer-og-leje-boliger.pdf (last access 10/12/2024).

15. https://www.sm.dk/arbejdsomraader/byggeri-og-boliglovgivning/andelsboliger (last access 11/12/2024).

16. Report from August 2024 with diagnosis and policy proposals: https://www.abf-rep.dk/nyheder/nyheder/2024/ny-rapport-viser-vejen-frem-for-andelsboligerne/ (last access 11/12/2024).

Danish case exemplifies how enabling institutions can help cooperatives to practise affordability, despite strong speculation in the urban housing market.

5.4. The Scandinavian model

Scandinavian housing cooperatives[17] exhibit dynamic and well-developed sectors with increasing opportunities to engage in the market and make profits. These countries benefit from advanced welfare states aimed at promoting equality and ensuring a minimum level of economic security, despite recent increases in inequality. They tend to display a significant gap between objective reality (the actual housing expenditure) and subjective perception (the view of that expenditure as a burden or risk). According to data from the EU Survey on Income and Living Conditions (EU-SILC)[18] and the OECD[19], since the mid-2010s, households in Sweden and Denmark report housing expenses as a percentage of income at or above the EU average (9–11%). In Denmark, this figure is 15–16%, the second highest in the EU, while in Sweden it ranges between 8–10%. However, public perception is less negative than the EU average: in the 2017 EU survey, 63–64% of respondents in Denmark and Sweden stated that housing was not a burden at all (compared to 23% on average in the EU). Similarly, the OECD survey found that housing was considered a burden for less than 40% of respondents, compared to the OECD-27 average of 50%. This disparity can be attributed to high levels of public investment in housing, coupled with strong economies and labour markets characterised by high employment and "flexicurity", as analysed in *Housing Europe*'s 2019 report[20]. In conclusion, the affordability of profit-oriented housing cooperatives depends on the broader institutional context, the housing system, other socioeconomic factors, and especially on housing regulations and public policies.

6. Non-profit seeking: a clear public function

This category primarily includes rental cooperatives, which maintain various relationships with public institutions and therefore adopt different approaches to limiting or eliminating profit-seeking in rental pricing. As such, they represent clear solutions of affordable housing.

17. Norway is a similar case to Sweden, although the price was deregulated in the 1980s.

18. https://ec.europa.eu/eurostat/web/microdata/european-union-statistics-on-income-and-living-conditions

19. https://www.oecd.org/content/oecd/en/data/datasets/oecd-affordable-housing-database.html

20. https://www.housingeurope.eu/resource-1323/the-state-of-housing-in-the-eu-2019 (last access 11/12/2024).

6.1. Canada and Quebec: a changing social orientation[21]

In Canada, housing cooperatives represent 0.7% of the housing stock, within a system comprising 69-70% private ownership and 30% rental (4% of which is social housing). Housing cooperatives emerged in the 1960s, received support from federal and provincial governments during the 1970s and part of the 1980s, but lost public support in the 1990s, with Quebec being the only province to maintain aid programmes. Ownership of housing remains with the cooperative itself, with rents used to cover operational costs. These cooperatives are structured as non-profit entities, a requirement for accessing government programmes. Funding under these programmes includes low-interest loans through the *Canada Mortgage Housing Corporation* (CMHC), direct grants to reduce construction costs, and financial assistance for operational expenses. Members of these cooperatives have a dual role: as partners and tenants. Member-tenants manage the cooperative and rent payments. Upon joining, members contribute an amount between 200 and 250 euros as part of the cooperative's equity, along with one month's rent. They may also acquire refundable shares in accordance with the cooperative's internal bylaws. Subsidies are available for members with low incomes, with 30-50% of cooperative households receiving public rental assistance. Some provincial laws protect tenants' rights in cases of exclusion from the cooperative. Additionally, the *Canada Housing Federation* (CHF) has established a risk subscription fund and a student housing cooperative fund.

Quebec exhibits some differences. According to Gigling (2020), rental housing cooperatives entered the policy agenda in the 1960s and began to materialise in 1973. Today, there are 30,000 homes spread across 1,300 cooperatives, housing more than 60,000 people. These cooperatives tend to be smaller in size than the national average and have a strong tradition of social heterogeneity. In Quebec, most individuals who become cooperative members have low to middle incomes. Households with low incomes can access rental assistance programmes (the main programme is called *Accès Logis*) which subsidise the portion of rent exceeding 25% of their income. Between 20% and 50% of the homes in cooperatives funded by *Accès Logis* must be reserved for households meeting the programme's requirements. Likewise, rent prices for new cooperative developments must fall within 75% to 95% of the area mean price. Initial rents for new cooperatives are typically set close to the upper limit of 95% to ensure the cooperative's financial viability. Over time, rents decrease and adjust based on expenses. In the medium to long term, cooperative rents tend to be lower than market rates. In some cooperatives, if rent aligns with market levels, members may receive a reduction, which can be as much as 50%, in exchange for participation in cooperative activities.

The Canadian and Quebec housing cooperative model has proven to be an effective solution for affordable housing within a social and community-oriented framework. Its public function is ensured by prohibiting legal opportunities for capitalisation or acquisition by private investors. The collective nature of ownership serves as the ultimate safeguard against profit-seek-

21. The main academic reference is Gigling (2020).

ing. In the event of a housing cooperative's liquidation, any remaining assets must be allocated to another housing cooperative, a federation or confederation of housing cooperatives, or, in the case of Quebec, the *Conseil Québécois de la Coopération et de la Mutualité* (CQCM). Additionally, if a cooperative plans to sell, transfer, or change the use of a property, it must obtain authorisation from the Ministry of Housing. The prohibition on capitalisation is a subject of debate within the sector. The *Confédération Québécoise des Coopératives d'Habitation* (CQCH) has advocated for the possibility of individual capitalisation of members' investments, a position that led to its departure in 2014 from one of the largest national federations. In summary, the Canadian model represents a political and institutional commitment to rental cooperatives with a clear social orientation. Differences between provinces and Quebec's unique approach add dynamism to the sector, though tensions remain regarding the potential for profit-seeking.

6.2. Uruguay: A humanist project of solidarity and mutual aid[22]

Uruguay's housing stock is about 58% privately owned dwellings, 20% private rentals and 22% in other forms of rental and living arrangements. Currently, housing cooperatives account for approximately 30,000 units, representing close to 3% of the country's housing stock, with a significant concentration in the capital area of Montevideo. According to Torrelli et al. (2015) and other sources, these have experienced a changing evolution since the Housing Act in 1968. This includes growth in the early-mid 1970s (reaching about 20% of the housing stock), followed by a prolonged decline and stagnation in the 1980s, a modest recovery in Montevideo in the late 1990s, and a general growth in the whole country from 2010, though this has stagnated since 2018. The country has two right-to-use housing cooperative models, with a clear decommodification feature. One model is the mutual-aid housing cooperative; this is the most widespread model and is based on collective self-building and requires minimal initial capital. Most cooperatives of this kind belong to the *Federación Uruguaya de Cooperativas por Ayuda Mutua* (FUCVAM). This model has been promoted in other Latin American countries (Bredenoord, 2017). The second model is known as the prior savings housing cooperative. Members are required to contribute an initial capital representing 15% of the cost of the project to hire professional builders. These cooperatives are grouped together in the *Federación de Cooperativas de Vivienda* (FEOVI). The main differences between these two models are the initial capital required and the method of building.

Cooperative housing in Uruguay owes much to the work of Juan Pablo Terra (1924-1991), a university sociologist and activist who promoted a Human Economy[23]. The philosophy behind FUCVAM's cooperative model is based on building and living in community. Once the loan is paid off, the cooperative is sustained through housing tenure and the transfer of use to its members. Virtually all mutual-aid housing cooperatives are user-driven and have a single mortgage:

22. The main academic references are Torrelli et al. (2015); and Barenstein et al. (2022).

23. https://institutojuanpabloterra.org.uy/juan-pablo-terra/ (last access 10/12/2024).

the ownership and debt responsibility rest with the entire cooperative, not with individual members. Public policies in Uruguay support access to resources (land and buildings), direct and indirect financial assistance, as well as technical support, with member-users eligible for subsidies. However, these policies are contingent upon the cooperative housing not engaging in market logic, not subcontracting to third parties, and ensuring that the sale value reflects only the amount invested individually. The relationship between cooperatives and politics in Uruguay has been challenging: cooperative housing was included in public policies in the 1968 Housing Act but was marginalised during the conservative dictatorship (1973-1985). After a neoliberal transition to a market economy, cooperative housing received renewed state promotion during the *Frente Amplio* government (2005-2019), composed of left-wing parties, which passed the new cooperative law in 2008. This highlights the complex relationship between cooperatives and the state in developing the necessary collaborative embedded autonomy and underscores the importance of public support for their social function. An interesting aspect of the Uruguayan model is that cooperatives become user-owned after they have been built.

6.3. Austria: A long tradition of social housing and a form of public cooperative[24]

In Austria, the housing system is focused on renting: 45% is privately owned, 45% is rented (23% social rental), and 8-10% is other forms. The large social housing sector is provided through a limited-profit sector, composed of housing companies and associations, based on the idea of serving the public and the common good (*gemeinnützig*): there are about 90 companies and 100 housing associations. Cooperative housing has a long history, with the most significant development in the city of Vienna. In early 20th-century "Red Vienna", community cooperatives were developed, and after World War II, in corporatist Vienna, professional group cooperatives were led by their trade unions. The neoliberal period from the late 20th century weakened this movement, but left a strong legacy, particularly in the form of social and affordable rental housing.

In Vienna, there are two types of social renting: city-owned flats and cooperative flats. There are about 220,000 city-owned flats and 200,000 cooperative flats. In both types, interested tenants must meet certain criteria to be able to apply for them. City-owned flats (*Gemeindewohnungen*) are entirely owned by the City of Vienna. They are run, managed, and renovated by the business enterprise City of Vienna - Housing. To be eligible for a city-owned flat, one must be a holder of the *Wiener Wohn-ticket*, which is a confirmation of registration in the city. Cooperative flats (*Genossenschaftswohnungen*) are built with subsidies from the Federal Province of Vienna, but they are owned and managed by the respective cooperative housing association (*Wohnbaugenossenschaft*)[25]. To access a cooperative flat, it is necessary to become

24. The main academic reference is Lang & Novy (2013).

25. Integrated in the Austrian Federation of Limited-Profit Housing Associations (Österreichischer Verband Gemeinnütziger Bauvereinigungen - Revisionsverband- GBV).

a member of the cooperative housing association. Tenants are often expected to make a financial contribution, the amount of which depends on the age and location of the building, as well as the size of the flat. The law stipulates that rents must be appropriate, which means that they must not be lower or higher than necessary to cover all expenses, including the legally limited return of 2%. However, the financial contribution paid by the tenant is refunded upon termination of the tenancy including a depreciation of one percent per year. This form of cooperative has a clear public function, and it widens the horizon of the housing commons and of the institutions necessary to promote affordable housing. Vienna is an example of city with an ambitious local government to generate affordable housing. Vienna is also experimenting with new forms of housing commons, under the Germany model of *Mietshäuser Syndikat* (apartment house syndicate) (Hölzl & Hölzl, 2022).

6.4. Switzerland: an urban cooperativism of public interest renewing the concept of "gemeinnützig"[26]

In Switzerland, 57% of the households are rented dwellings, and 38% are privately owned. There is almost no public housing. Non-profit rental housing cooperatives make up about 5% of the housing stock and 8% of the total rental housing stock. Their distribution varies regionally: among the six cantons, cooperatives in Basel-Stadt and Zurich account for about 10% of all apartments. Of all housing cooperatives, 55% are in the largest cities and 35% are in the city of Zurich. These non-profit housing cooperatives operate under the concept of *gemeinnützig* (meaning non-profit, common good and social values). There are two types of housing co-operatives: a) membership housing co-operatives, where all tenants are members; and b) entrepreneurial or construction co-operatives. After a period of gradual decline, growth resumed since the 1970 and 1980s, mainly in the large cities.

In Switzerland, cooperative housing began in the late 19th century, based on a tradition of local community self-help. Public support via financial aid and land availability has been multi-level (confederation, canton and city). This movement has also had a history of being supported by well-established and integrated collective organisations. Today, two main umbrella organisations dominate the sector. The *Wohnbaugenossenschaften Schweiz*, the association of non-profit housing organisations (WBG), created in 1919, founded by members of public authorities, architects and politicians, has currently around 1,100 members with around 150,000 apartments. The WBG has a decentralised structure, composed of 10 regional associations, with Zurich being the main one. The other is *Wohnen Schweiz*, an association of housing construction cooperatives (*Baugenossenschaften*), formed in 2010 when the Association of Liberal Housing Construction Cooperatives (1965) and the Association for Housing and Ownership Promotion (1981) merged. In 2020, various collective organisations adopted a "Charter of the non-profit housing organisations of Switzerland" to lay down the principles guiding the actions of non-profit and cooperative housing organisations, such as no speculative profits,

26. The main academic references are Balmer & Gerber (2018); Koch (2021); and Barenstein et al. (2022).

good-quality, affordable and sustainable housing, integration of disadvantaged households, and tenant participation and self-determination.

At confederal-national level, the Housing Support Act passed in 2003 had limited impact on implementation and finance. However, it did assign cooperatives a central policy role and certain priority rights of access to land and finance. The local government level has been crucial. Many local governments ruled by social democratic parties used housing cooperatives to foster decommodified and affordable housing without having to rely solely on public funding. A period of rejuvenation began when the urban and the housing question re-emerged in the 1980s. The new housing cooperatives had a more progressive and political vision, redefining their content, values, and practices, while becoming political actors. It was driven by political leadership and new policy instruments, such as ground leases, issue of bonds, securing of mortgages via state-owned pension funds, etc.

Zurich, the largest city in Switzerland, provides an interesting example. It has a long-standing tradition of non-profit housing, with around 20% of dwelling units operated as cooperative housing (9.5% in the canton of Zurich). Public support focuses on relatively competitive access to lands and subsidies to low-income citizens. Thus, cooperatives collaborate with social organisations to invite people with low incomes or disadvantaged situations, who are entitled to rental subsidies. This ensures the social composition of the cooperatives remain heterogeneous and inclusive. Cooperative members pay a rent that only covers the housing costs, and which is calculated based on the rate of interest on the borrowed capital, the costs of maintenance and administration and the accrual of reserves for renovations. They collaborate with the city council on the setting of the rent. On average, rents in housing cooperatives are 20-30% lower than in the private rental sector. Likewise, if a cooperative dissolves, the municipality or the canton has a right of pre-emption. In a policy consultation in 2011, 76% of citizens supported the goal that, by 2050, one third (33%) of the apartments in the city should be owned by non-profit housing organisations. The Zurich model is an example of civil cooperatives with a clear public utility and collaboration with local public institutions and social organisations.

6.5. Germany: a historical and hybrid system with recent dynamics[27]

In Germany, 40% of the housing stock is privately owned and 60% is rental: 3-4% is social housing managed as rental cooperatives (down from about 10% in 2000), and 10-11% is public housing. The social and public rental sector is publicly subsidised and promoted and is provided by municipal housing companies and cooperatives, as well as by private landlords, commercial developers, and investors. Legally, all housing companies are considered market actors, although the municipal ones act according to local policies.

In Germany, cooperative housing has a long history, despite its decline in recent decades. Originally, there were two types of housing cooperatives: the homeownership housing model,

27. The main academic references are Balmer & Bernet (2015); and Pfatteicher et al. (2024).

since 1862; and the rental cooperative housing model, since 1885. The German cooperative model is a conventional rental cooperative, where an individual must become a member to live in the cooperative. Although the amount for membership can vary substantially across cooperatives, it is usually comparable to standard rental security deposits. The cooperative is limited to how much it can increase rents. Cooperatives are non-profit entities, and the members decide how surplus funds are used. Some of the cooperatives may also have non-resident members or investors. These individuals (or larger legal entities) put money into the cooperative for modest dividends (usually around 4%). Balmer and Bernet (2015) compared rental housing cooperatives in Germany and Switzerland. In Germany, their collective organisations lacked a defined role in housing policies, and no clear access to support programmes. Public aid existed until the 1980s but disappeared in the 1990s, and cooperatives no longer receive government support. Since the 2006 law amendment, cooperatives do not have a social function and are freer to establish the access criteria, etc. This has encouraged specialised cooperatives aimed at groups, such as students, seniors, immigrants, etc.

The cooperative housing tradition has established an institutional context where new dynamics are possible. Since the 1990s, a new form of cooperative or common housing has emerged, *Mietshäuser Syndikat* (apartment house syndicate), tracing its origins back to the squatters' movement in the 1980s. This model combines the cooperative principles with corporate structures: property acquisition, self-management and collective collaboration. Each collective housing project works as an autonomous company-cooperative, i.e., a separate enterprise that owns the real estate, with the legal status of a limited liability company (GmbH in Germany). The syndicate works as a federation for all housing projects, offering resources such as financial assistance, organisational support, and expertise, etc.[28]

7. Conclusions: models and public policies to promote affordable cooperative housing

In recent decades, under neoliberal capitalism, housing has become a central element of market logics. It has evolved into a central commodity in the functioning of financially speculative and asset-based capitalism. Increasing urbanisation has amplified pressure on housing values in urban areas, along with a growing socioeconomic inequality. The development of socioeconomic affordable housing is urgent, and the cooperative model offers a viable solution by promoting decommodification and fostering the idea of housing as a common.

Globally, there is a wide variety of cooperative housing models and structures. Two main types have been identified based on their relationship to profit-seeking: contextualized prof-

28. https://www.syndikat.org/en/the-joint-venture/ (last accessed 9/12/2024).

it-seeking (exemplified by the cases of the United States, Sweden and Denmark) and non-profit-seeking (illustrated by the cases of Uruguay, Canada, Austria, Switzerland and Germany). While the non-profit-seeking model is clearly affordable, the contextualized profit-seeking type presents both empirical and political challenges. Here, it is the institutional context that frames and enables affordability practices. Of the three cases analysed, only Denmark has an institutional framework that promotes at least a minimally affordable character for cooperative housing, despite the commodification pattern in recent decades.

Public policies and regulations are essential, and two orientations or levels have been identified. At a basic or general level, alongside advancing housing policies that complement systems promoting general affordability, the state and governments must adopt a proactive and collaborative attitude toward civil initiatives. This requires a multilevel, coordinated, and comprehensive approach that includes diverse regulatory measures and civic-oriented instruments to encourage collective, solidarity-driven civil action. In this context, the concept of *collaborative embedded autonomy* has been proposed to define the relationship between housing cooperatives and the state. At a specific level, it is crucial to develop various forms of support across three key stages: production, management, and maintenance. Financial assistance in construction and social accessibility management is important, but the rules and standards that ensure the preservation of the cooperative model's social orientation are especially critical. In some cases, this may require the creation or modification of institutions and institutional innovation. A locally adjusted combination of institutional regulations and institutional enabling is recommended to help housing cooperatives maintain their social accessibility and ensure a minimum of socioeconomically affordability, especially in the cases where market profit-seeking is permitted. These two sets of policy recommendations can also apply to other housing commons initiatives.

In conclusion, cooperative housing is a clear option for affordable housing in our societies. It requires supportive public institutional contexts and civil society's contribution to fostering economic equality and solidarity. With respect to housing, besides affordability, two additional objectives may be: a) environmental sustainability of housing in the era of climate change, including considerations for materials, spaces, renovations and adaptations, common infrastructure and services, and construction methods, especially in urban environments; b) social well-being, fostering community relations within buildings, neighbourhoods, and urban districts, as a source of comprehensive individual and community health. These objectives should form part of the research agenda on fair and sustainable housing.

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