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**Conference Paper**

## Housing policy and economic development: the Croatian case

42nd Congress of the European Regional Science Association: "From Industry to Advanced Services - Perspectives of European Metropolitan Regions", August 27th - 31st, 2002, Dortmund, Germany

**Provided in Cooperation with:**

European Regional Science Association (ERSA)

*Suggested Citation:* Fröhlich, Zlatan (2002) : Housing policy and economic development: the Croatian case, 42nd Congress of the European Regional Science Association: "From Industry to Advanced Services - Perspectives of European Metropolitan Regions", August 27th - 31st, 2002, Dortmund, Germany, European Regional Science Association (ERSA), Louvain-la-Neuve

This Version is available at:

<https://hdl.handle.net/10419/115584>

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## **Housing policy and economic development: the Croatian case**

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**Paper to be presented at**  
**the 42<sup>nd</sup> European Regional Science Association Congress**  
**Dortmund, August 27-31, 2002**

### **Summary**

Housing in Croatia is beset with many problems, as reflected in a dramatic fall in new housing construction, low housing standards, absence of streamlined policy which would encourage housing construction, as well as ambiguous regulations governing this area.

Transition from planned to market economy requires far-reaching and comprehensive changes in the whole institutional framework, from central government structures to the private sector. This is particularly true of the housing sector which under the previous socio-economic system had a special political and social place. Transformation and introduction of new institutional structures required for a successful development of the housing sector in Croatia is one of the main bottlenecks within that sector. This particularly applies to local authorities, non-profit housing associations and the private sector.

However, what is still missing is the main leverage required for organising the housing activities at the national level – and these are appropriate financial instruments, in the sense that they are not developed enough to enable the housing sector to really contribute to Croatia's economic and social development. To be more specific, it is necessary to provide financial instruments and paper will deal with proposals for the national housing finance policy. Namely, what will be checked too, is a gradual shift of general state support mechanisms towards direct public financing of priority projects, for example, in the form of subsidies. Subsidy financing would be efficiently concentrated on the housing projects enjoying a general public and political priority, such as low-cost housing construction for young families/first-time homebuyers or social housing projects of local authorities or projects of non-profit housing associations based on rental and controlled prices of new housing units.

In the future restructuring of local administration and self-government units allowance will have to be made for the need to clearly define responsibilities in order to ensure efficiency in implementing the housing policies. This topic will be particularly emphasized in the paper as well as the role of non-profit housing associations and banking sector.

At the end will be presented an outline of the key elements of the housing sector in Croatia as seen by the Expert Group to highlight the main bottlenecks in the sector and to propose the future actions of the national housing strategy.

## **1. The objectives of the national housing policy**

The objectives of the national housing policy are derived from general development plans, with partial goals expected to conform with the resolution of the UN Conference on Human Settlements (Habitat II). The targets of the national housing policy can be classified into the following groups:

- (a) Creating conditions in human settlements for improved housing and thereby reduced poverty and unemployment;
- (b) Improving the housing conditions and arresting further degradation of the housing stock;
- (c) Improving the housing environment; and
- (d) Improving the management of human settlements.

The Government should develop a strategy aimed at the following objectives:

- (a) Creating conditions for increasing the volume of housing construction;
- (b) Support to occupational mobility;
- (c) Improvement of social and communal infrastructure;
- (d) Dealing with property disputes and introducing reforms in the area of housing management;
- (e) Introducing economically sound principles of housing management, combined with state support to needy families ;
- (f) Developing diverse systems of financing private and public housing construction;
- (g) Developing new institutions, a legal framework and organisational structures to this end;
- (h) Reducing energy demand by better utilisation of energy-saving building technology and improvement of thermal insulation in the existing building stock;
- (i) Introduction of new instruments for local development and housing management;
- (j) Establishing institutions and organisations suited to market economy, capable of assuming a part of responsibilities now lying with government authorities;

- (k) Developing a strategy of regional and urban development (counties, towns and municipalities); and
- (l) Government and local self-government staff training.

This set of goals represents a comprehensive approach to the development of the housing sector. But what is also required is to develop a clear national housing policy. In such a policy the Government should present its general views on the problems and challenges encountered in the housing sector, emphasise the priorities and goals envisaged in relation to these challenges, and thus adjust the current and new policy instruments designed to reach these goals. The national housing policy should provide a framework for all other participants in the housing sector.

### **Policy recommendations 1**

Accelerated transition of the housing sector in Croatia requires a clearly defined national housing policy. The Government should give a priority to this policy by defining:

- a) Key problems, challenges and strategies;
- b) Priorities and goals;
- c) Existing policy instruments and their intended effects;
- d) Proposed new policy instruments and their intended effects;
- e) Expected results and a time-frame.

## **2. Housing as a political priority**

In the first transition years the housing sector was not a political priority. This lack of political interest, along with sweeping macro-economic changes, led in those early years to a negative development of the housing sector.

However, what is still missing is the main leverage required for organising the housing activities at the national level – and these are appropriate financial instruments, in the sense that they are not developed enough to enable the housing sector to really contribute to Croatia's economic and social development. To be more specific, it is necessary to provide financial instruments for and assistance in coping with the following four principal tasks:

- (a) Forming the National Housing Fund;
- (b) Investment in maintenance and repair of the existing housing stock;
- (c) Financing new housing projects, at the price of the controlled rental housing; and
- (d) Efficient system of housing allowances which would increase flexibility in the area of rental housing.

These four tasks are vital for forming the National Housing Fund. The housing policy in Croatia should be a part of the development concept of a welfare state and follow the welfare standards of the developed, especially EU countries.

In the late nineties the housing sector began to rank relatively high on the Government's priorities, to the effect that the Law on Housing Saving and Government Incentives for Housing Saving provided the first stimulus to come to grips with the housing problems. The Law on the Fund for Long-term Government-assisted Financing of Housing never came of age and the new Government has given up its application.

In early 2000 the Croatian Government announced housing incentives targeted at medium-income groups to help them with favourable loans come by a home of their own. The success of this programme will primarily depend on how ready the towns will be to contribute to it.

In their development policies the local authorities (with laudable exceptions) have not so far given any priority to housing, which has additionally contributed to the diminishing number of newly built housing units.

### **3. The existing housing stock and housing construction**

The current situation in respect of housing construction is as follows:

- (a) The local authorities and the private sector have not yet bridged the gap arisen after the state ceased to be directly involved in building new housing units;
- (b) A sharp fall in housing construction has in turn led to falling housing standards;
- (c) The low rate of new housing construction has resulted in the loss of new jobs and failing growth, including multiplier effects which are particularly felt in the area of housing; and

(d) The ongoing low rate of housing supply greatly restricts household mobility to and within urban areas. These are serious impediments to occupational mobility with a crippling effect on a faster economic growth.

Apart from what can be achieved on a short- or long-term basis in the area of new housing, the capacity and quality of the future housing stock will greatly depend on the ways in which the existing housing stock is maintained and upgraded. Any housing policy must be focused on efforts to raise and improve the standards of the existing housing stock. Anyway, the fact is that the existing housing stock poses a great and urgent challenge for the following reasons:

- (a) The pre-transition housing policy laid emphasis on quantity rather than quality. The consequences of it:
  - Partly low-quality building technologies and materials, especially in the publicly sponsored housing construction segment;
  - Low investments in maintenance and repair; and
  - High housing concentration on new surfaces with poor care for the environment.
- (b) Developments during the transition period have only aggravated these problems, namely:
  - The state is no longer financing works intended to raise the standards of the existing housing;
  - Local authorities, largely due to financial restrictions, have not been able to arrest the trend of falling efficiency in the housing sector;
  - The new form of private ownership in multi-flat buildings (condominiums) cannot properly cope with the maintenance and repair problems, due to vague property right regulations and practical unfeasibility, as well as the lack of finance, especially in case of buildings in poor technical shape; and
  - Private owners find the conditions for financing major reconstruction projects unacceptable.

Table1. Number of housing units built in Croatia in the period 1981-2000

Year	Publicly sponsored housing construction		Private housing construction		Total	
	No.	Index 1981=100	No.	Index 1981=100	No.	Index 1981=100
1981	12216	100	18237	100	30453	100
1982	11850	97	15451	85	27301	90
1983	12323	101	16601	91	28924	95
1984	9363	77	15903	87	25266	83
1985	9698	79	13060	72	22758	75
1986	9683	79	14113	77	23796	78
1987	8006	66	14762	81	22768	75
1988	7897	65	13869	76	21766	72
1989	6470	53	13871	76	20341	67
1990	5084	42	13512	74	18596	61
1991	4153	34	8470	46	12623	41
1992	1962	16	5805	32	7767	25
1993	808	7	7535	41	8343	27
1994	808	7	8902	49	9710	32
1995	845	17	6514	36	7359	24
1996	1217	10	11407	63	12624	41
1997	793	7	11723	64	12516	41
1998	1246	10	11311	62	12557	41
1999	4454	36	7721	42	12175	40
2000	...	...	...	...	12200*	40

\* estimation

Source: Croatian Almanac of Statistics – The greater number of newly built flats since 1996, as explained by competent statistical services, is a result of post-war reconstruction of devastated housing.

The extent of poor maintenance and neglect of the housing stock requires a systematic approach and pilot projects, such as repair of flat roofing and the like. Such projects, to ensure their efficiency, should be accompanied by legislative reforms.

The preconditions for further development of social housing in terms of rational housing standards are closely linked to the price that the future tenants can afford. To this end, special regulations ought to be prepared.

## Policy recommendations 2

1. The need for more new housing must be met by the private sector and non-profit housing associations in co-operation with local authorities. For the private sector to fulfil this task, the following framework conditions have to be created:
  - (a) Access to housing construction financing and long-term mortgage arrangements must be provided;
  - (b) Local authorities must reorganise themselves as soon as possible to become efficient partners of the private sector. To this end, local authorities have to:
    - Establish political and administrative structures and routines able to cope with challenges
    - Draw up local housing policy, strategy and action plans
    - Prepare and implement a zoning policy for new housing, including efficient land management
    - Provide financing of infrastructure needed for new housing, including new financial instruments and access to capital markets to suit local self-government requirements.
2. It is necessary to work on pilot projects for rehabilitation of the existing housing stock, as well as social housing pilot projects
3. Local authorities should engage themselves in the area of new housing in order to create satisfactory social housing conditions for groups needing social help. Such projects should be carried out as follows:
  - (a) Local construction projects - for such projects the National Housing Fund should offer particularly favorable financing conditions
  - (b) Construction by non-profit housing associations. Such projects should be incorporated to the projects of the non-profit housing associations, with local authorities contributing to them with land and infrastructure.

#### **4. Housing construction economics and affordability**

Economic growth and rising personal income resulting from rapid growth are a prerequisite for a more efficient policy aiming to meet the housing needs.

As already noted, one of the principal reasons for the slow pace of the transition of the housing sector in Croatia is the lack of finance and appropriate



financial instruments. There are several key factors preventing the emergence of such instruments:

- (a) High crediting costs;
- (b) Slow appearance of mortgage financing, combined with marked problems of land registers;
- (c) High building costs.

Housing construction will remain stagnant as long as financing is largely based on private savings. What is needed are new policies and instruments aiming to:

- (a) Simplify the mortgage banking transactions;
- (b) Increase the number of banks offering mortgage loans;
- (c) Form the National Housing Fund, which will ensure more favorable financing conditions;
- (d) Provide favorable loans to non-profit housing associations from the National Housing Fund.

The National Housing Fund should provide guarantees to current housing investments in order to reduce the risks to potential investors and homebuyers. This would attract more funds in the initial construction stage, which in turn would lead to reduced financing costs and thereby reduced prices of housing. This would also encourage sound competition and the emergence of reliable contractors.

Public housing allowances can assume two main forms:

- (a) Loans with subsidised interest rates; and
- (b) Budget incentives.

Option for these instruments can be understood in the light of the existing economic conditions prevailing in the countries in transition. In this context it is proposed to recognize investment in one's own home for tax relief purposes. It should be reconsidered whether such a high Value-added Tax (VAT) levied on rental is justified. Namely, what should be checked in practice is a gradual shift of general state support mechanisms towards direct public financing of priority projects, for example, in the form of subsidies. Subsidy financing would be efficiently concentrated on the housing projects enjoying a general public and political priority, such as:

- (a) Low-cost housing construction for young families/first-time homebuyers;

- (b) Social housing projects of local authorities, supported by the National Housing Fund;
- (c) Projects of non-profit housing associations based on rental and controlled prices of new housing units;
- (d) Reconstruction and renovation projects intended for houses and flats damaged during the war, suitable for energy efficiency.

Funds for the National Housing Fund should be collected from the sale of state-owned flats (a part of the proceeds currently intended for the State Budget, a part of funds pooled by the local self-government units, plus bonds on flats sold for convertible currency). Additional funds would be collected through the loans granted by the European Bank for Reconstruction and Development, the Development Bank of the Council of Europe and the World Bank. The National Housing Fund should play a leading role in initiating the housing construction programmes.

Local self-government units should be given preference in terms of access to the National Housing Fund and other public financing instruments.

Tenants of unsold state-owned flats have been given the tenure of tenancy status, paying a protected rent determined by local authorities. These rents are extremely uneven and likely to cause further degradation of these flats.

This housing stock requires legislative reforms to the effect that its tenants should pay fair rent which would be subsidised, subject to certain criteria. This would make the housing policies more transparent and the local authorities more accountable.

### **Policy recommendations 3**

1. A greater private demand for new housing presupposes the existence of an efficient mortgage credit system.

To this end, it is necessary to:

- (a) Simplify the mortgage banking transactions as soon as possible;
- (b) Reconsider the existing statutory tax lien to ensure that property can be a real security for mortgage lending;
- (c) Make the registration of titles and deeds (under the Land Registers and Mortgages Act) an efficient means of mortgage lending;
- (d) Shorten the time and reduce the costs of obtaining formal documentation on property from local authorities.

2. Government incentives to housing financing through the National Housing Fund are vital for a faster construction of new housing units.

3. Financing of new local housing projects requires new solutions, such as:

- (a) Promotion of housing projects in partnership with the private sector and non-profit housing associations;
- (b) Granting a privileged status to the local housing projects in order to ensure required financing by the housing financial institutions established by the Government.

4. A housing investment system should be introduced to ensure that at the very start of a building project the available funds of all parties involved in the complex construction process are collected, and to reduce the prices of housing.

5. The income from renting houses and apartments should be tax-free.

6. The possibility of introducing the tax on unused property (housing units, apartments) should be reviewed, as well as consequences of this measure.

7. Under the Law on Social Care, rents and tenancy costs are currently subsidised from local government budgets, funds that must be earmarked for that purpose. There is no reliable information about how this system works. It should be pointed out that the Government has imposed very strict criteria in respect of the size of dwelling used by a tenant. Subsidising the tenancy costs will be an important instrument in protecting the standard of living of more and more needy people. In this connection an in-depth analysis of this trend is required:

- (a) The present rent and tenancy cost subsidy system should be subjected to an analysis guided by the principles of fairness, transparency and accountability;
- (b) Local authorities should allocate sufficient funds for these purposes;
- (c) The property census and other conditions should be expanded for the subtenants, who alone are paying commercial rents, to get access to subsidies; it implies introducing a transparent (rent) housing market with a free rent policy;
- (d) Criteria for granting subsidies should be based on “standard costs” of an appropriate dwelling, not on actual rent charged.

## **5. Institutional framework**

Transition from planned to market economy requires far-reaching and comprehensive changes in the whole institutional framework, from central government structures to the private sector. This is particularly true of the housing sector, which under the previous socio-economic system had a special political and social place. Transformation and introduction of new institutional structures required for a successful development of the housing sector in Croatia is one of the main bottlenecks within that sector. This particularly applies to local authorities, non-profit housing associations and the private sector.

At the parliamentary level, a Housing Committee should be set up to work in conjunction with other parliamentary committees in submitting comprehensive housing bills. Considering the sheer number of bills to be adopted in connection with housing, the Parliament and its committees will certainly have to make a series of decisions on the basic legal framework governing the housing sector. The composition of the Housing Committee should include, along with the executive officials, representatives of various interest groups as well as professional and scientific institutions.

Due to the problems caused by the battered housing stock and migrations, the Croatian Government is advised to prepare a study, based on the coming 2001 census, of the housing standards in Croatia with an assessment of housing needs to serve in housing construction planning. A national survey of consumer trends currently prepared by the National Bureau of Statistics will also be helpful to such a study.

Another thing required for this purpose is a continuous, sufficiently financed research work, preferably supported by a specialised scientific institution established on the model of other (developed and transitional) countries, dealing with the problems in question and acting as an advisory body to government authorities in matters concerning the development of the housing sector.

For successful and organised implementation of housing policies it should be reconsidered if the current interdepartmental separation of the zoning segment from the housing and building construction segment is advisable in terms of efficiency.

As the future housing development requires an efficient regional policy, co-ordination and co-operation, this regional level should be improved through reforms in the organisation and operation of the regional institutions representing central and local government bodies.

It is at the local level where the housing policy should be implemented and where an operationally capable housing sector framework should take root. Hence the paramount importance of how the local government bodies are organised and their routines conceived. Their responsibilities in dealing with the housing problems in their areas are rather vaguely defined in the Local Administration and Self-government Act. The expected legislative reforms will have to assign a greater responsibility to and define the obligations of the local authorities in the area of housing.

The lack of experience of the local authorities in acting as an independent agent in market economy (especially the lack of political and administrative structures, appropriate procedures and qualified staff) is a factor, which certainly impedes the transformation of the housing sector.

Although individual towns are developing their own solutions to their specific housing needs, there is a serious lack of general guidelines for strategic and organised changes in the housing sector at local levels. There is no regular exchange of practical experience in successes and failures of individual towns.

The local policy of land use for future housing projects will significantly influence the housing conditions in Croatia. It is important that in their long-term housing policies the local authorities anticipate at an early stage the land availability and cost for housing development in their respective areas.

The private sector is becoming a crucial agent of Croatia's economic growth. It is bound to play an increasing role as a generator in the housing sector. Owing to its rising power and influence, the private sector has already gained the upper hand in the development of towns. Ad hoc decisions are often made under a strong pressure exerted by the private sector or other vested interests. Hence the need for greater expertise within the local authorities for them to become a real and equal partner to the private sector. It is desirable to explore the prospects for the local authorities to become active participants in initiating housing construction projects based on principles combining market requirements and social needs. To this end, the local authorities in areas where the housing scarcity is particularly felt should draw up and adopt five-year housing building plans based on assessed housing demands and adjusted to the existing physical and zoning plans.

In future restructuring of local administration and self-government units allowance will have to be made for the need to clearly define responsibilities in order to

ensure efficiency in implementing the housing policies. This particularly applies to administrative affairs and procedures.

The non-profit housing associations in the developed countries, originally acting as housing co-operatives, have a long tradition behind them and are now indispensable agents in addressing the housing problems. Indeed, the housing co-operatives are one of the most suitable forms of housing privatisation and housing provision to homebuyers. As organisations, the housing co-operatives have gained in importance in all countries in transition.

Over a certain period of time the housing co-operatives played an important role in Croatia's housing policy. The Constitutional Court of the Republic of Croatia decided to repeal the Housing Co-operatives Act as of 1 October 2000. At the request of the Union of Croatian Housing Co-operatives, however, the enforcement of this decision was deferred by the end of 2000. Over the past period the housing policy was neglected in Croatia, so the repealed Housing Co-operatives Act was never harmonised with the Constitution of the Republic of Croatia.

The Housing Co-operatives Act should be passed as soon as possible, in which the housing co-operatives will be defined as non-profit organisations like those in the developed countries, able to play an important role in Croatia's housing policy.

The banking system, which is crucial for future development of housing, has been undergoing hectic structural changes, of which the key elements are: concentration and consolidation of major banks, absorption of smaller banks by large financial institutions, and privatisation of State banks.

#### **Policy recommendations 4**

1. The local level is most suitable to co-ordinate the housing-related policies and activities, infrastructure development and land use.
2. Participation and co-operation by local authorities in housing policies and spatial planning of local importance are indispensable. While solutions require central government assistance, emphasis must be laid on the participation of local authorities.
3. Practical steps must be taken to enable local authorities to become an efficient partner of the central government in the area of housing:

- All local authorities should formulate their housing strategies/policies. As the first step, all the towns with population exceeding 40,000 should be requested to draw up such development plans in a specified time;
  - Political and administrative structures of local town authorities should be reorganised to be able to efficiently address the problems and use the opportunities available in the housing sector;
  - Decision-making and management procedures and practices in local housing construction should be adapted to the requirements of a market-oriented, open and transparent housing policy;
  - Local government housing offices urgently need staff training programmes and supporting equipment (PCs, instruction manuals, quality control systems, etc.);
  - Each local authority should develop its policy/strategy related to building land;
  - Local authorities, in co-operation with other parties concerned, should encourage the building of family houses by providing sites and minimum services.
4. For implementation of these recommendations the relevant ministries should assist the local authorities and their organisations in textbooks, manuals, training programmes and provide other facilities to make them familiar with possible standard solutions, procedures and recommended transitional practices.
  5. For the broader public to better understand the local housing sector and to participate in it, the local authorities should keep the public informed and maintain a dialogue with the public as part of their housing strategy/policy.

## ANNEX I

### Some macroeconomic data for Croatia 1996-2000

	1996	1998	2000	2001
GDP per capita ( US\$)	4.422	4.833	4.344	4.625
Export (mil US\$)	4.512,0	4.541,0	4.390,0	4.659
Import (mil US\$)	7.788,0	8.383,0	7.911,0	9.044
Trade balance (mil US\$)	-3.276,0	-3.842,0	-3.521,0	-4.385
Unemployment rate (% change)	16,4	18,2	21,1	22,3
Industry production (% change)	3,1	3,7	1,7	6,0
Retail prices (% change)	3,5	5,7	6,2	4,9
Producer's prices (% change)	1,4	-1,2	9,7	3,6

## Demographic and Social Needs

Population 31.03.2001 (million)	4,4
Population annual average rate of change 1990-2000 (in %)	-0,9
Density, person/sq.km 2001	78
Average household size 2001	3,1
Housing units, 2001 (th)	1 647
Housing units per th pop, 2001	380
Households per housing units, 2001	0,897
Floor area per person, sq.m. 2001	27,6
Person per room, 2001	2,7
2000 housing stock: built before 1945, %	42,5
built between 1945-70, %	35,6
built between 1971-80, %	11,4
built between 1981-90, %	6,2
built between 1990-00, %	4,3

## ANNEX II

### Housing affordability

#### Access to the market: different segments and different income groups

#### Affordability statistics, 2000

Average household income based on statistics: 8000 € per year

Daily or hourly rate:

Cleaning women in the private sector: net income per hour 1,4 €, net income/per month 250 €

Handy man (gardening, construction work): net income/per hour 2,2 € or 400 €/per month

Average net income of public servant (teacher at gymnasium with 5 years experience): teacher at the secondary school 530 €/net income per month

Average interest rate for a housing loan: 7-11% (depends on deposit amount)

#### Price of housing unit in €

Type 1: Capital city 30-45 minutes travelling distance from the centre, housing estates built in 70s and 80s average condition, 2 rooms apartment

Type 2: Capital city good location, suburban type of housing, built in the 90s, 100-120 m<sup>2</sup>,

Type 3: Capital city, traditional suburban/village environment, not high prestige, family house built before 1990, 100-120 m<sup>2</sup>

Type 4: Small city with inhabitants of 30-50 thousand, housing estates built in 70s and 80s average condition, 2 rooms apartment,

Type 5: Town/Village (less than 30 thousand inhabitants), family house built before 1990, 100-120 m<sup>2</sup>

Type 1	65.000 €
Type 2	170.000 €
Type 3	110.000 €



Type 4	30.000 €
Type 5	50.000 €

Construction cost €/m <sup>2</sup>	600 €/m <sup>2</sup>
Price of the new units €/m <sup>2</sup>	1000-1500 €/m <sup>2</sup>

### ANNEX III

#### A tabular overview of the housing sector in Croatia

The tables below sum up the current status of the housing sector in Croatia. This tabular presentation outlines the key elements of the housing sector in Croatia as seen by the Expert Group and its main purpose is to highlight the main bottlenecks in the sector and to propose where the future actions should be concentrated. As shown in the tables, the main impediments to the further transition of the housing sector in Croatia are institutional rather than economic. What the principal problems in the housing sector amount to are the low rate of new construction, the low growth rate and the low standard of the existing housing stock which needs improvement.

#### The status of the housing sector in Croatia

FACTOR PROFILE	PROFILE STATUS	
	STRONG	WEAK
<b>Political priority</b>		<b>X</b>
Parliamentary (legislative) level		<b>x</b>
Executive power level	<b>x</b>	
Local self-government level		<b>x</b>
<b>Institutional level</b>		<b>X</b>
Parliament		<b>x</b>
Executive power level	<b>x</b>	
Counties		<b>x</b>

Local self-government units			X
Private sector		X	
Homeowners & tenants associations		X	
<b><u>Legal framework</u></b>		X	
Local government legislation			X
Ownership and real estate legislation	X		
Housing rental legislation		X	
Housing financing legislation	X		
Condominium legislation	X		
Legislation on housing co-operatives			X
Legislation on housing subsidies			X
<b><u>Economic framework</u></b>		X	
Investment in housing construction			X
Potential capacities	X		
Government incentives to housing construction		X	
Private investments	X		
Rental policy			X
Housing subsidies policy			X
<b><u>Housing supply and quality</u></b>		X	
Quantity supply of housing	X		
Age structure		X	
Housing stock equipment		X	
Degree of housing maintenance			X
Energy efficiency			X
Land earmarked for new housing			X
<b><u>Social factors</u></b>			X
Registered social housing needs			X
Policy of meeting social housing needs			X

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