

## **Paper for the ERES Conference 2019**

**Motivations to become a member of a housing cooperative:**

**Comparison of the national characteristics of Sweden, Germany and the USA**

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## Abstract

Cooperative housing systems vary widely depending on different influence factors. These factors include for example specific target groups, country-specific structures and financial concepts. In general, a housing cooperative is an association of people, who wants to become shareholders of a real estate project. On one hand, being member of a housing cooperative is some kind of home ownership, although the cooperative corporation owns the site and the buildings. On the other hand, members pay an additionally monthly amount to cover the regular costs of all real estates owned by the cooperative.

There are various motivations to become a member of a housing cooperative. Urban structures are changing constantly. Due to urbanisation, increasing running costs and a high number of overaged buildings, the housing shortage is increasing. Today, the residential market is unsaturated in a lot of agglomeration areas. Furthermore, the expectations of the population regarding their housing conditions change. The rising demand for more space, more leisure facilities and better infrastructure impede the fulfilment of the requirements for adequate living space. As a consequence, the affordability of the dwelling is just one of the various advantages of this housing concept. Within this paper different cooperative housing systems are analysed and compared. The main aim of this research is to identify the different motivations to become a member of a housing cooperative in selected countries. Thereby, Sweden, Germany and the USA have been selected for investigation because of their great variety of housing cooperatives. Sweden is famous for its long tradition of cooperative housing development. In the United States of America (USA) the density of metropolises challenges the residential market, whereas in Germany the nationwide dense population has great impact on the development of housing cooperatives.

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## 1 Introduction

Cooperative housing is a long-time developed form of housing tenure. Different housing problems in the past, as well as current and future housing markets influence the development of different forms of cooperative housing. Problems like housing shortage, quality defect or increasing housing costs, force people to work together (cf. Ruonavaara, 2012). People are looking for new solutions of these problems while checking their best individual options. Also, they profit of using the advantages of joint cooperative movements, like lower housing costs. Cooperative housing is the most common, comprehensive denomination for special legal forms of collective housing (cf. Die Wohnbaugenossenschaften Deutschland, 2017).

By analysing the existent definitions and descriptions, it appears that cooperatives are repetitively categorised into different parameters. Each parameter is a characteristic which could be construed as a motivation to establish a cooperative corporation or a motivation to become a member respectively. The questions which target group should benefit, how the internal structure is organised or how the financial concept is calculated, are indicators of former problems which have to be solved. The historic background of each housing cooperative might help to identify these characteristics. For instance, some housing cooperatives are subsidised by labour unions. Those cooperatives are founded for a specific reason. The intention is to improve the housing conditions for the workers of the labour union within different cities. Because of the constant change of the location, workers are not able to finance a flat at each of their workplaces. With entering a housing cooperative, a flexible system of room sharing improves the housing conditions of the workers (cf. Clapham, 1982).

Further, the information about the country in which they are founded, is a decisive parameter. For example, Sweden is a large country with mostly small towns and a few big cities like Stockholm and Gothenburg. Here, housing cooperatives are already following a long tradition of cooperative housing development (cf. Ruonavaara, 2012). The variety of cooperative housing systems is much bigger than in any other countries. In contrast to Sweden, the USA as a significant larger country, has a lot more and bigger cities and a totally different housing development. Here cooperative housing is a developing concept coming from the largest cities. Around cities people have enough social contact and less expensive housing opportunities which causes less foundations of housing unions (cf. Wilcox, 2012). Housing cooperatives in Germany are caused by the nationwide density of towns and cities. Especially during political changes and because of the high urbanisation process with a horizontal growth of cities, the motivation for establishment or the membership in a housing cooperative is raising (cf. Die Wohnbaugenossenschaften Deutschland, 2017).

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## **2 Objective**

This paper has a fourfold aim: First, the country's specific development of cooperative housing systems will be evaluated critically regarding Sweden, the USA and Germany. Second, the defining parameters of different forms of cooperative housing systems will be clarified. The combination of already existing definitions and descriptions jointly list all parameters that are needed for a correct classification. By extracting different types of housing corporations and associations the problematic of the same denomination across nations and state specific regulations needs to be considered. Therefore, comparisons of housing systems are named in connection to the corresponding nation. This paper focuses on the basic situation and representation of specific cooperative housing systems of each country. The position of the members as owner or as tenants will be evaluated. Third, the main parameters of the exemplary selected cooperative housing systems in the specific three countries which matter to people for a foundation or a membership in a housing cooperative will be compared and extracted. The disadvantages and advantages of these decisive parameters will be compared.

## **3 Methodology**

The paper is based on literature review and web presence of housing cooperatives as the background of all assumptions. Therefore, the literature about the general topic of how to write a literature review has been read. The common structure of a thesis with introduction, body, and discussion is followed and supplemented with an abstract, an objective, the methodology and a conclusion (cf. Murray, 2005).

The introduction is an overview about the housing cooperatives characteristics of the selected countries. The aim of the discussion is to highlight why people join or establish housing cooperatives with particular attributes.

Information about different denominated housing cooperatives were collected and analysed in detail. The references include different dates from 1974 to 2017 and locations of foundation for better representation of single arguments in connection to time. The results are shown in a schedule and divided in nine denominations of cooperative housing and in six different parameters.

## **4 Results**

### **4.1 Historical development of housing cooperatives**

The definition of the key criteria for different cooperative housing systems requires the knowledge of previous historical developments and changes.

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## *Sweden*

The idea of cooperative housing in Sweden came up in the end of the nineteenth century. The first law for cooperative housing was passed in 1895 (cf. Bengtsson, 2000). People in need of housing tested various forms of collective housing system in Gothenburg and Stockholm, until they founded the first permanent cooperative housing system in 1916 (cf. Clapham, 2012). The association SKB (Stockholm Housing Cooperative Association) built small flats in the city centre of Stockholm. It is a form of self-organisation by housing consumers (cf. Anund Vogel, 2016).

In 1923, HSB (Tenants Savings Bank and Housing Association) was founded by a National Tenant Union. The HSB lent its members money to build or to buy property. The membership was designed for the better working class and required some capital. Today HSB is a national organisation and one of the largest associations in Sweden (cf. Ruonavaara, 2012). Members of local cooperatives, which are party of the HSB, listed people who are waiting for an apartment and people who have savings with the HSB saving banks are members of the HSB. The association is a non-profit organisation (cf. Clapham, 2012).

In the 1920s the whole cooperative housing sector attracted attention. The third largest housing cooperative was established by a collection of building trader's unions like the Labour Union in 1940. By designing new domestic and commercial buildings and by accepting the managing role of the new buildings, Svenska Riksbyggen combatted the unemployment in the construction industry (cf. Clapham, 2012).

Today, housing cooperatives cover about a fifth of all housing in Sweden. Here, the Swedish expression for cooperative tenure is 'bostadsrätt' which literally means 'housing right' (cf. Ruonavaara, 2012).

## *USA*

The first housing cooperatives were founded in New York, San Francisco and Chicago – areas of high population density. Those cooperatives which became managed by unions demanded higher membership fees and were meant for people with higher incomes (cf. Mushrush, 1997). Since the promotion by federal governments with subsidy programs in the 1960 and 70s the housing systems developed greatly. An example is the Mitchell lama housing program in New York (cf. Wilcox, 2012).

Actually, the NAHC (National association of Housing Cooperatives) is the consolidation of all housing cooperatives of the USA. Over half of the American housing cooperatives are located in New York City, named market rate housing cooperatives. They are also designed for low- or mediate-income households (cf. Wilcox, 2012). Terms like tenant shareholder, stock and proprietary lease are used expressions in the cooperative housing sector around New York (cf. Bell Ross, 2005).

## *Germany*

The first housing cooperatives in Germany which are generally called 'Wohnbaugenossenschaften' were evolved in consequence of deficient, overpriced and unsanitary

conditions of dwellings on the residential market in the 19th century. At this time, founding a cooperative was connected to a high risk of bankruptcy because of undefined rules and unsettled responsibility for the property. Since the law of “Cooperative Societies Act” in 1889 introduced the concept of limited liability, cooperatives developed much better than before. From 1889 until 1914, the number of housing cooperatives grew rapidly from approximately 38 associations to more than 1400 associations. Today, private and public providers of social housing are influencing the housing market in Germany. Actually, over 2000 housing cooperatives own approximately 2,2 million buildings and have five million residents who are living in a cooperative. In contrast to an average rental price of 7,79 Euro per square meter, a price of 5,27 Euro per square meter in housing cooperatives is a significant lower priced option (cf. Die Wohnbaugenossenschaften Deutschland, 2017).

#### 4.2 Definition of key parameters

First, the different key parameters of different cooperative housing systems will be identified. Based on the historic development, nine forms of cooperative housing have been extracted. In general, cooperative housing is just one form of housing tenure. A housing cooperative is a coalition of people, who wants to become shareholders of a real estate project (cf. Ruanovara, 2005). On one hand, being a member of a housing cooperative is some kind of home ownership. On the other hand, the members of a housing cooperative pay a monthly amount to the cooperation comparable to a rent. For people who become part of a cooperative, elsewhere the terms ‘member’ or ‘co-operator’, ‘membership’ and ‘occupancy agreement’ are commonly used terms to describe the resident’s share in the housing cooperative (cf. Clapham, 1992). Summarising, it depends on the percentage of shareholding, to what extend residents are the owner or the tenants of the housing cooperative. Within this paper this percentage is defined as property index to rates the relation of tenure and ownership in each cooperative housing system.



Figure 1: Legend of the property index

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By analysing the existing definitions and descriptions, different denominations have been identified based on literature review to classify the existing forms of cooperative housing: denomination, nation, target group, profitable intention, internal structure and investment-management.

The denomination is a formal expression for a better comparability and communication across nations. Mostly, the denomination of the particular system is already giving an impression of the special characteristics of the parameter. Sometimes different housing forms developed in a particular country are connected to specific circumstances. That's why it is important to attribute the named cooperative to a specific country and to set all following information in a national context. Therefore, the information of the country is the second parameter. The target group is the most important key criteria for this work. The main aim of this paper is to extract the motivations for a membership of a housing cooperative, moreover the paper aims to define for whom the identified parameters are important to, who is going to benefit and who could be interested in a housing cooperative.

The intention in terms of profitability leads to two groups: founder and participants. In this context it is important to point out for whom and through which revenue the housing cooperative becomes profitable. The criterion of the internal structure clarifies the responsibilities of associates for the cooperative's management and development. The connected parameter, the investment-management, is an important criterion by identifying the individual cashflow. Besides the information of the profitability of the housing cooperative, the information about the origin of the income are listed.

#### 4.3 Classification of housing cooperatives

The denomination 'cooperative tenure' is used for a concept that refers to a non-profit cooperative association. With the membership, the residents gain the right to use and/or to control their dwelling. Both forms: non-equity membership and equity membership are possible forms of cooperative tenure. In case of an equity cooperative, residents are allowed to sell their membership and rights, or to use them as an investment security. Residents do not have those rights in a non-equity cooperative (H. Ruonavaara. 2005). The non-equity form of cooperative tenure is especially a common form of housing cooperative in Germany (cf. Die Wohnbaugenossenschaften Deutschland, 2017).

The denomination of 'equity sharing' in Sweden, 'co-ownership' in Germany and 'condominium' in USA entitles housing cooperatives with different denominations but the same meaning. All three systems describe a non-profit housing cooperative which addresses to middle income households. The property of the housing cooperative is a jointly owned facility of all shareholders. Examples for this kind of cooperative housing are common interest communities or retirement villages (Clapham D. 2012).

In non-profit 'par-values cooperatives' in Sweden and Germany for middle income households, the members share equally the cooperative housing property. The ownership



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can be sold, and residents get in case of leaving the redemption of the whole original value of the entrance fee. The cooperative keeps the interest rate (Clapham D. 2012).


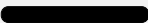





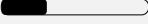

'Tenant management cooperative' is a general, nationally-unbound description of a non-profit housing cooperative for low income households or people in need of social housing. That means, with their membership residents enter into a landlord management agreement. As a consequence, residents of a 'tenant management cooperative' have the right to live in the cooperative property but do not own a stock or something similar. Further, residents have the right to trade their ownership right, but they do not have the authority to manage any property of the cooperative (cf. Clapham, 2012).

The expressions 'public rental cooperative' and 'owner occupied cooperative' are oppositional and outline the extreme options for cooperative housing in relation to the property-index. The 'public rental cooperative' is a non-profit cooperative for the working class and a wide range of population. It is only designed for consumption. In contrast to that, the owner-occupied cooperative is profit oriented and designed for consumption and investment for the individual investors of the upper- and middleclass. Both forms are nationwide expressions and used for cooperative housing systems in many countries (cf. Clapham and Kinetra, 1992).

'Tenant ownership' is a form of cooperative tenure, in which residents have the right to trade tenant-ownership rights. This form of cooperative housing is especially common in Sweden for limited equity shareholder. Hereby, residents do not own equal stocks of the cooperative housing. They gain as much as they spent for their share of the cooperative (cf. Ruonavaara, 2005).

'Market rate housing cooperatives' is an expression for a profit housing cooperation for the middle- and high-income class in New York City, USA. Members of the cooperative are housing owners and tenants who pay the normal market rate rents. The purpose of the cooperative is to lower financing and property tax costs and to lower transfer costs at the time of resale (cf. Wilcox, 2012).

The last identified form of cooperative housing is the 'limited equity housing cooperative' in the USA. This form of housing cooperative is comparable to the 'tenant ownership cooperative' in Sweden. Families with limited equity (low-) and moderate-income households are allowed to become members. To preserve the affordability, the cooperative is for long-term residency and sponsored by the labour union and the ethnic emigrant society (cf. Wilcox, 2012).

Denomination	Nation	Target group	Profitability	Internal structure	Investment - management	Propertyindex	Source
Owner occupied cooperative	USA, Sweden, Germany	private, middle class (individualist)	profit	market oriented	membership fee and monthly payment, consumption and investment		4
Co-ownership/ Equity sharing/ Condominium	Germany, Sweden, USA	middle income households	non profit	same ranking and possession of each shareholder, equal share of ownership	jointly owned facility, payment accordingly to interest		1
Par-values cooperatives	Sweden, Germany	middle income households	non profit	equal share of ownership	deposit, cooperative profit of interest rate, subsidies by government		1;4
Tenant management cooperative	USA, Sweden, Germany	social housing	non profit	landlord management agreement	membership fee and monthly payment, right to trade ownership right		1
Cooperative tenure	USA, Sweden, Germany	no target group	non profit	commission elected by members	membership fee and monthly payment, equity-or non equity, right as security can be sold or not		2
Tenant ownership	Sweden	limited equity shareholder	non profit	commission elected by members, owner occupation	membership fee and monthly payment		2;4
Limited equity housing cooperatives	USA	Low- and moderate-income families	non profit	longterm residency and preservation of affordability	sponsored by labour union and ethnic emigrant society/ Government financial assistances		1;3
Market rate housing cooperatives	USA (New York)	middle/ high income households	profit	landlord management agreement, in larger city, of existing buildings	members pay market rate rents, saving of taxes and fees		3
Public rental cooperative	USA, Sweden, Germany	limited equity, working class (spectrum)	non profit	commission elected by members, public oriented, only consumption	membership fee and monthly payment, subsidies by government		4

1 Clapham, D. 2012

2 Ruonavaara, H. 2005

3 Wilcox, R. 2012

4 Clapham, D. and Kinetra. 1992

Figure 2: Schedule of cooperative housing classification

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#### 4.4 Reasons and motivations for foundation and membership

Based on the analysis of the historical development and the classification of housing cooperatives, it became obvious, that the reasons for a membership vary widely. In the following, the identified political reasons and individually motivations are analysed regarding social, economic, ecological and ethical reasons.

##### *Political reasons for housing cooperatives*

In economical consideration, profit municipal- or profit national cooperatives earn money with high membership fees or nationalization of cooperatives including their properties. Following, the economy gets boosted by private investments in the housing sector, because of the rising affordability for a wider range of people (cf. Bell Ross, 2005). Housing cooperatives facilitate to measure the organisational and financial situation of the particular housing market, due to the housing management of the cooperative's system.

Today, nations are influenced by large volume of immigrants. In social policy, the support of cooperative housing accelerates the process of integration and reduction of the housing shortage (cf. Saegart and Winkel, 2001). A social policy itself can promote cooperative housing to underline its cooperative or communitarian political philosophy (cf. Wilcox, 2012). Usually large housing sectors are owned by municipal housing sectors. In some regions, especially in Sweden, municipal housing is transformed in cooperative housing as an alternative option. The government keeps an overview on the housing market and also enables residents to live in their own flat and to have rights and responsibility for the property. Looking at the Figure 2, in most cases the residents are in an intermediate situation between owning and renting. The local, municipal or national corporations share the property with the residents (cf. Clapham, 2012).

Cooperative housing prevents crime by integration of regular associations in low-income cooperatives. A foundation of a housing cooperative is based on the idea to create sustainable and traditional dwelling with focusing on limits of costs and area. Besides the social sustainability, ecological sustainability is also important (cf. Saegart and Winkel, 2001). Regarding non-profit housing cooperatives, the ecological relevancy often is one point of the regulatory compliance with standards of safety, efficiency and quality (cf. Mushrush, 1997)

##### *Individual reasons for housing cooperatives*

Next to the political intentions, the individual intentions are important impulses in order to implement the growing cooperative housing sector. People are entering a housing cooperative, looking for their best possible opportunities for living for their particular circumstances and requirements. Therefore, the circumstances of the particular affected person determine the frame condition of the new or chosen housing cooperative (cf. Die Wohnbaugenossenschaften Deutschland, 2017).

Due to the increasing housing shortage households with limited financial resources as well as the middle-income households are suffering from rising rents or high prices for

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property. Those circumstances motivate residents to participate or to establish a housing cooperative. Low income households are the mostly effected target group. For a correct specification and to prohibit the direct connection of social housing and cooperative housing 'households with limited financial resources' is a better expression in most cases (cf. Ruonavaara, 1992). Housing cooperatives implicate the increase of property, independently whether it is shared or not shared. Residents of equity cooperatives can sell their cooperative rights. In some of these cases, members use the housing cooperative as an investment, a stock or a security loan. Housing cooperatives with nonequity right, are protected by changes in demand and supply in the housing market. They are a noncommodified, price regulated form of housing (cf. Ruonavaara, 2012). Similar to the 'market rate housing cooperative' in the USA, members of a cooperative can also benefit from financing and property tax costs. Further advantages and motivations to join a housing cooperative are lower transfer costs lower transfer costs in case of resale. The membership or the dwelling will be sold as personal property instead of real estate property (cf. Wilcox, 2012).

A social motivation for individuals to join or to found a housing cooperative is the social contact and common thinking within a housing cooperative. Examples are the 'co-ownership housing cooperative' in Germany, 'equity sharing housing cooperative' in Sweden or the 'condominium cooperative' in the USA. Thereby social equally interested people are living for example in common interest communities or retirement villages. Likewise, the individual ownership is combined jointly with a responsibility for all common parts (cf. Clapham, 2012). Residents in cooperative housing can be part of a social housing program but have a higher standard of living than the usual standard of social housing. Cooperative housing is a 'not in mass produced, qualitative product' (Mushrush and Krause, 1997). The safety of the dwelling and the neighbourhood influence complete urban developments because of matching income, standards, life phases and styles. (cf. Bell Ross, 2005) Cooperative housing compared to affordable housing prevents crime by integration of regular associations in especially low-income cooperatives, which are mostly infected by higher crime scenes (cf. Saegart and Winkel, 2001).

In ecological consideration, housing cooperatives can involve their member's circumstances into the design process of new buildings. Specific requirements of jobs or health can affect the real estate development of the dwelling and generate more sustainability.

## **5 Discussion**

Within this research the main aim was to outline the motivations to become a member of a housing cooperative. Hereby the country's specific characteristics of Sweden, Germany and the USA have been examined separately and compared. Similarities and contrasts could be identified with regard to these countries.

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Similarities from the examined countries may be mostly affected by the general need for housing and a place to live. All three countries are first world countries with a fast evolution. Therefore, profitability and affordability are always one of the top leading aspirations. That is why the non-profit intention of a housing cooperative could be a motive, especially for households with limited financial resources, to become a member. Mostly, the housing cooperatives for households with limited financial resources are characterized by the lowest property index, like the 'public rental cooperative', the 'limited equity housing cooperative' in the USA, the 'tenant ownership cooperative' in Sweden and 'tenant management cooperatives' in the USA, Sweden and Germany. Becoming a member of one of these housing cooperatives solely intends to find space to live without intending to invest or to own. Otherwise, due to the constantly increasing housing shortage and the unsaturated, residential market, housing cooperatives like the 'market rate housing cooperative' in the USA, or the 'owner-occupied cooperative' could be found. These housing cooperatives have financial profit intention and could benefit from the current situation. Also, members of these cooperatives, for middle- and high-income households, could have the intention to invest and to financially profit from the cooperatives.

In all three countries people are looking for affordable and adequate accommodations. Furthermore, the expectations of the population regarding their housing conditions have changed. The rising demand for more space, more leisure facilities and better infrastructure impede the fulfilment of the requirements for adequate living space. The non-profit cooperatives could be a possibility for people who are looking for qualitative housing. They provide dwelling with non-profit intention to offer their members the most beneficial housing circumstances.

Accordingly, the results of some extracted denominations of housing cooperatives are general expressions and are not related to a specific country, like the public rental cooperative, the cooperative tenure and the owner occupied cooperative. If there are nation related expressions they are mostly in connection to a denomination in the national language, like in Sweden 'bostadsrätt' or in Germany "Wohnungsbau-genossenschaften". The main difficulty seems to be the extraction of a denomination which is not used for a near explanation of regulations but is an official denomination that could be used internationally. 'Co-ownership-, equity sharing- and condominium cooperatives' seem to have identical parameters and the same system but could hide unknown differences in more detailed regulations which are not discovered within this paper. Further, the denominations of different forms of housing cooperatives are compared with the help of set parameters. These parameters could be changed or adjusted with a different method of approach. This is important to interpret the results correctly and to consider other options for parameters.

After evaluating the results, it became apparent that a lot of the general associations with cooperative housing do not suit the former and general explanation of a cooperative housing system. Regarding the classification of the market rate housing cooperative in the USA, the corporation could be understood as a financial organisation instead of a cooperative. That could explain, why a cooperative housing system only exists in one of

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the examined countries, like the tenant ownership cooperative in Sweden. Further research is needed especially regarding the denomination of different cooperative housing systems.

## **6 Conclusion**

By extracting the motivations to become a member of a housing cooperative the paper concludes the country's specific developments and different denominations. All three countries, Sweden, Germany and the USA in comparison have contrasts and similarities and each country seems to have specific national characteristics. The variety of cooperative housing systems from non-profit intended-, to profit intended cooperatives, from low income, to high income households, as target group and from low property index, to high property index cooperatives distinguish housing cooperative in the three selected countries. Summarising, Sweden is a large country with just a few towns, but also cities like Stockholm and Gothenburg. Here, housing cooperatives are already existing since 1895 and are following a long tradition of cooperative housing development. In contrast to Sweden, the USA is a significant larger country, with more and bigger cities and a different housing market development. Hereby cooperative housing is developed in the largest cities like New York City and San Francisco. Around the cities people have enough social contact and housing opportunities which causes less foundations of housing unions. Here housing cooperatives are mostly founded for compensation of housing shortage and limited financial resources of people living in metropolises. Housing cooperatives in Germany are caused by a national density of towns and cities. Especially during political changes and because of high urbanisation with horizontal growth of cities, the motivation for establishment or the membership of a housing cooperative is raising.

The finding of this paper can be understood as a basic evaluation and analysis of the motivations to become a member of housing cooperative, based on facts about the housing cooperatives. The findings may be considered in the future development of cooperative housing forms as well as for further research. Therefore, it would be interesting to involve further countries. Thus, other regional and national differences could be determined.

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