



Fig. 1 Residential buildings in Pristina, capital city of Kosovo (photo credits: Arben Llapashtica)

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SAFETE VELIU REXHEPI¹, KRISTINA CAREVA², MIA ROTH-ČERINA²



- ¹University of Zagreb, Faculty of Architecture; Fra Andrije Kačića Miošića 26, 10000 Zagreb, Croatia
- © ORCID.ORG/0000-0003-3553-0696
- ² University of Zagreb, Faculty of Architecture; Fra Andrije Kačića Miošića 26, 10000 Zagreb, Croatia
- ORCID.ORG/0000-0002-0945-6122
- ² University of Zagreb, Faculty of Architecture; Fra Andrije Kačića Miošića 26, 10000 Zagreb, Croatia
- ORCID.ORG/0000-0002-6919-5825

sveliurexhepi@arhitekt.hr kcareva@arhitekt.hr mroth@arhitekt.hr

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REVIEW OF HOUSING POLICIES IN KOSOVO FROM 1947-2021

COLLECTIVE HOUSING
HOUSING POLICIES IN KOSOVO
RESIDENTIAL NEIGHBOURHOODS IN KOSOVO

In a period of transition, sudden and numerous economic, social and political changes led to an uncontrolled growth of cities in Kosovo. The rapid population growth and geographical expansion of cities challenged planned development, which resulted in an uncontrolled urban expansion. This paper includes a historical review of housing policies in Kosovo from 1947 until 2021. The research starts with the period after World War II, which marked the beginning of a trend of

rapid construction all over Europe, both due to urban growth and as a result of the destruction of many residential buildings. It analyses the implementation of policies, laws, housing regulations in residential neighbourhoods and, in particular, multi-unit housing in Kosovo. The research also includes housing policies in some of the most developed countries in Europe, to give the reader a clearer understanding and comparison of European and Kosovar housing issues.

INTRODUCTION

ousing is one of the basic necessities of life. Housing and housing policies are among the core problems for the social, economic and political development of a country, so it is important to create mechanisms that ensure the selection of appropriate housing conditions for all citizens, especially for the most vulnerable categories (Institute for Spatial Planning, 2010: 30). Housing is an important economic and social component of development, organization and regulation of space and it impacts the quality of life of citizens.

All countries that are going through a period of transition face many challenges in different areas. Kosovo, as a new state, went through a challenging planning period. During the last conflict of 1999, about 30% of apartment buildings were destroyed or damaged. As a result of the destruction, there was a period after the war when rapid transition and reconstruction that affected major cities of Kosovo, especially Pristina, took place. In the absence of housing policies, construction laws, or regulations, the postwar period and rapid construction in Pristina were rather challenging.

In the absence of consolidated research on planning, urban development and dwelling which meets needs, the paper includes a brief historical background of housing policies affecting the quality of multi-family housing construction. It analyses the history of housing and housing policies since the be-

ginnings of collective housing construction in Kosovo. Furthermore, a special emphasis is placed on post-war housing policies and current housing sector policies. As a territorial part of Europe, Kosovo has been consistently indirectly linked to housing policies that have been developed in Europe, albeit under political influences of different governments. There are still efforts to adapt to good examples of European countries, providing citizens with affordable and suitable housing conditions. Therefore, housing policies in Europe have been reviewed.

As housing policies affect many aspects related to appropriate housing, the paper aims to give an overview of the history of housing policies in Kosovo. Furthermore, through a comparative method between Kosovo and Europe, housing policies are analysed from different perspectives, such as: investment cost, housing standards, legislation and urban planning.

The historical overview of housing policies in Kosovo presented in this paper deals with the period from 1947 to 2021. The research was conducted using archival and bibliographic units: books, papers, documents, reports, etc. Using analytical, qualitative and comparative methods, the research focused on the impact of housing policy on collective housing, so a comparison was made with some European countries as examples of good practice.

Providing ample living space will be one of the main challenges for our society. There is no doubt that the demand for housing is high, and it surfaces in varying degrees depending on the region. Currently, only the private sector is involved in increasing the housing stock in Kosovo, which is often characterized by irregularities and a lack of criteria, while the social housing sector is less developed. The solution to this problem in Kosovo has been made more difficult by the lack of data on the number of dwellings needed (Institute for Spatial Planning, 2010: 30).

HISTORICAL BACKGROUND OF HOUSING POLICY IN EUROPE AND KOSOVO

With the expansion of cities after World War II in 1945, European socialist states developed housing policies to provide proper planning of housing. All European countries have been developing housing policies at local levels, and these processes are observed in the Balkans as well. When the construction of collective housing in 1947 started in Kosovo, which was then a part of the Yugoslav federation, special policies were developed. Public housing was financed by state-owned enterprises (Fig. 2). The "social apartment" was one of the symbols of the socialist system, reflect-

ing the concept of "common ownership" in which the right to dwell in an apartment owned by society fell in line with the current paradigm of social justice in general (Franic, Korlaet, Vranic, 2005: 199).

In the Balkans region, as well as in Kosovo, the partition of former Yugoslavia brought about political and economic changes that affected the stagnation of investment in housing. On the other hand, European western countries continuously developed policies for providing shelter for their citizens. A significant reduction in state subsidies in Kosovo was observed especially after the conflict in 1999. During the last two decades, statewide instability has affected an unsatisfactory development of housing policies, which had an impact both on the legislative aspect and the economic one. All trends focused on the improvement of legislation and not much attention was given to the subsidized housing programs. At the same time, Europe invested in the further development of housing policies, in addition to improving planning and legislation issues, which provided suitable housing programs for middle-income citizens.

HOUSING POLICIES IN EUROPE

Housing policies vary significantly from country to country, and this topic is undoubtedly contested even in the most developed countries of Europe. Nevertheless, all countries of the European Union (EU) have found it necessary to subsidize housing by one set of means or another, and this has been done in a wide variety of ways (Maccrone and Stephens, 2017: 1). In EU countries, urban development is an issue addressed by local governments with the participation of citizens, as part of decision-making (Tsenkova, 2005). Historically, various housing policies have been applied in European member states. Whereas



the housing cost overburden is relatively low in many Northern European and Central/Eastern European (CEE) countries, it is high in Germany, Denmark and Bulgaria, and the problem is particularly acute in Greece and some Balkan countries (Caturinas et al., 2020).

After the devastation of World War II, after 1945, development of housing policies and investment in housing began to be widely practised in Europe. Large-scale (often largely subsidized) housing construction began to eliminate serious shortages by the 1960s. The development of the social-rental sector, in many countries, was considered to be an essential tool for alleviating the need for housing and wider ownership of home for a long time, the long-term goal was increasingly aided by tax breaks and exemptions (Balchin, 1996: 15).

According to the report of the European Parliament (1996), housing policies in EU member states were divided into the following groups: owner occupied sector, private rented sector and social rented sector.¹ A significant difference between states can also be seen in the GDP percentage of governments spending in the cost of housing policies. The contributions made by governments, and thus by taxpayers, are enormous in European countries. The cost of support varies between 1% and just over 4% of GDP. Housing policy is a key spending element for all governments in Western Europe (Maccrone and Stephens, 2017: 3).

During the last decade of the 20th century, the countries of Southeast Europe experienced economic growth and great progress in advancing their structural reform agenda. The growth trajectory across the region has been uneven, yet countries have been able to maintain macroeconomic stability and support political reforms towards democratic

Fig. 2 First multi-family housing in Pristina, 1947

¹ However, these common strands disguise diversity in the levels and forms of intervention. Member States' housing policies of the may be categorized into four groups:

The Netherlands, Sweden and the UK are characterized by much state intervention. These countries have the largest social rented sectors in the EU and their governments spend more than 3% of GDP on housing policy.

²⁾ In Austria, Denmark, France and Germany there has been less market displacement and large private rented sectors have been retained. Public expenditure on housing policy typically lies in the range 1-2% of GDP.

³⁾ Ireland, Italy, Belgium, Finland and Luxembourg form a disparate group, but all have large owner occupied sectors and relatively small social rented sectors. Government expenditure on housing is usually limited to around one per cent of GDP.

⁴⁾ Portugal, Spain and Greece have particularly large owner occupied sectors, minimal social rented sectors and (until recently) declining low quality private rented sectors. Government expenditure on housing policy is less than one per cent of GDP.

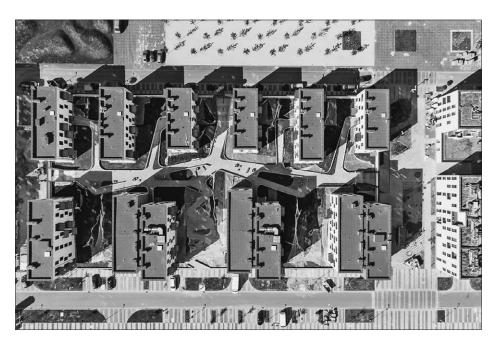


FIG. 3 SMALL COMPLEX OF AFFORDABLE MULTI-FAMILY BUILDINGS BUILT IN 2016 IN WROCŁAW, POLAND

governance (Tsenkova, 2008: 19). The constant tendency of countries of Southeast Europe was to pursue policies similar to those of Western countries. Reforms require extensive privatization of companies, as well as of land and housing. The process of privatizing homes involves changing ownership and managing housing stock, and a new housing financing system (Pichler-Milanovich, 1994). Within this period, countries in Southeast Europe were surrounded by military, economic and political crises and conflicts including Albania, Kosovo and Macedonia and the serious debt burden of Serbia and Montenegro. Furthermore, in Bosnia and Herzegovina, Serbia and Montenegro and Croatia, over one million people were left without a permanent home after being displaced within or across countries during the conflict years (Tsenkova. 2008: 7).

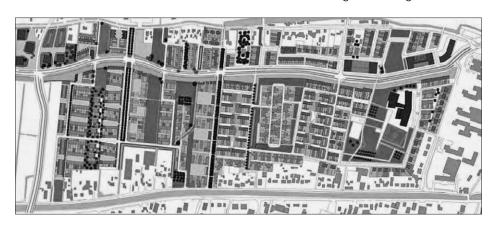
The phenomenon of improving the housing stock and meeting the housing needs can be

observed continuously. Another practice that can be seen in some European countries is affordable housing (Fig. 3). The affordability of housing generally refers to the cost of housing services and shelter — both for renters and owner-occupiers often relative to a given individual's or household's disposable income (Bieri, DS., 2014, cited in: Caturianas et al., 2020).

However, research shows that in the medium-term, the economic recession and the loss of jobs and incomes could further increase the cost of housing and the number of homeless people in Europe (Housing Europe, 2021).

Since European countries use policies that they develop at central level, there are mechanisms for improving housing policies. The majority of countries have a national housing strategy in place.2 Funds are another important parameter that affect the quality of housing. Of course, investment is not the only way that governments can influence housing outcomes, with regulation being just as important. In this respect, a plethora of reforms have been adopted across Europe in recent years, related to many different areas from the reform of housing benefit schemes (for instance in France), the target group for social housing (the Netherlands), planning regulation (United Kingdom) and many more (Housing Europe, 2021: 6). According to The Organisation for Economic Co-operation and Development (OECD)³, governments need to invest in social and affordable housing in order to provide housing for all, as well as to maintain and renovate existing stock. New constructions must have a suitable location. Therefore, plans, regulations, land use and zoning must be continuously reformed (Fig. 4). Investing in urban renewal strategies improves the quality of neighbourhoods, increases overall access to jobs and services, and reduces spatial segregation (OECD, 2021). Governments should include housing as part of inclusive development, improving the quality of housing and neighbourhoods.

Fig. 4 Masterplan of Langerak, Leidsche Rijn, Netherlands



2 Twenty-seven out of 40 countries report having a national housing strategy in place in the 2021 QuASH. Countries with a national housing strategy include: Brazil, Bulgaria, Canada, Chile, Colombia, Costa Rica, the Czech Republic, Denmark, France, Germany, Iceland, Ireland, Israel, Japan, Mexico, the Netherlands, Norway, Poland, Portugal, the Russian Federation, the Slovak Republic, Slovenia, South Africa, Spain, Switzerland, the United Kingdom (England), and the United States. Malta is in the process of developing a national housing strategy.

Eleven countries report that a national housing strategy is currently not in place: Australia, Austria, Belgium, Estonia, Finland, Latvia, Lithuania, Luxembourg, New Zealand, Romania, Slovenia, Sweden and Turkey; however, several of these countries report that housing policy objectives are set out in regional housing strategies (Austria, Belgium) or other political documents (Australia, Luxembourg and New Zealand) [OECD, 2021].

Since the EU has no direct responsibility for housing policy, there are numerous EU regulations which may exert influence on housing policy and/or the housing system in the member states.4 Currently, the EU has the mandate to implement and respect social rights, including the right of access to social housing, it has also made the Green Deal its guiding principle and the fair energy transition and decarbonisation of the building stock should, therefore, have a central place in the years ahead (Egner et al., 2020: 144; Housing Europe, 2021: 6). Countries that apply such policies have the largest social housing capacity (Netherlands, Austria, Scotland, etc.; Table I).

HOUSING POLICY IN KOSOVO

Located in the south-eastern part of Europe, Kosovo is a young state that has gone through challenging political, economic and social periods. Today, it has about 2 million inhabitants, with a continuous uninterrupted population increase, causing an overcrowding of urban areas. In the absence of plans, these urban areas have been taking shape without any control of construction and spatial development. From the data provided by the Kosovo Agency of Statistics from a Census of 2011, it was estimated that there were about 750,000 residential buildings of all types (Table II) in Kosovo. Family migration to medium and large cities has been the main factor of increased demand for housing after the war. The average number of members per family is 6.5. This average varies from rural to urban areas.

The Ministry of Environment and Spatial Planning, as the main entity responsible for Special Housing Programs, administrates the proposing, drafting, approving and ensuring the implementation of policies – strategies and legislation, monitoring and reporting on these programs. Municipalities are responsible for identifying housing needs within the area of their responsibility, developing housing programs, securing construction sites, creating and administering a database, administering, maintaining, monitoring and reporting (Institution for spatial planning, 2010).

 Review of housing policies in Kosovo until 1999 – As a territorial part of Europe, Kosovo was also influenced by the political developments of the Second World War. At that time, it was a part of the former Yugoslav federation, and mainly had settlements with lowrise buildings. After the war, rapid population growth and geographical expansion of cities prompted broad strategies of raising housing capacities in cities across the country (Marcetic, 2020: 23). Around the 1960s, with the beginning of collective housing construction, Kosovo's central policies were developed by Belgrade, which was the centre of the socialist state of Yugoslavia (Fig. 5). In Yugoslavia, the ownership of plots in urban areas was administered by the state from 1945 to 1990 and for this reason large-scale planning projects were made possible, which is not the case today (Franic, Korlaet and Vranic, 2005: 205). Former Yugoslavia had a different kind of socialist system compared to other Central and Eastern European countries because it followed a "special path of socialism" based on self-management and open relations with the West (Hegedüs and Tosics, 2003: 21-33).

Yugoslavia implemented a housing policy in which public housing construction was financed by state-owned enterprises, organizations and institutions, and housing was allocated to employees according to their priority on waiting lists. Since these funds were not sufficient, the state introduced a mandatory tax on house construction. Persons who had access to public housing were entitled to a lifelong lease, which could be bequeathed to family members who would continue to pay the rent, which was very low because it was not determined by economic mecha-

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ELLS IN KOSOVO

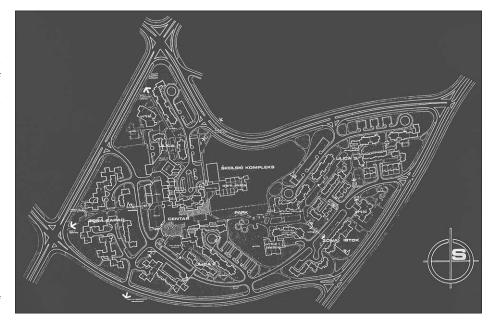
412,884

13 m²

Number of apartment buildings

Average used space for resident

Fig. 5 Masterplan of Neighbourhood "Bregu I Diellit", Pristina, Kosovo, 1980s



³ The Organization for Economic Co-operation and Development (OECD) is an international organization that works to build better policies for better lives, members of this organization are most European countries. OECD: Better policies for better lives. Available at: https://www.oecd.org/about/[Accessed: 29 March 2022].

⁴ The most important regulations include the Energy Performance of Buildings Directive (2010/31 / EU, last amended by 2018/844 / EU), anti-discrimination regulations like Directive 2000/43 / EC as well as the general prohibition of state aid (Art 107 TFEU). The right to housing assistance is also mentioned in the EU's Charter of Fundamental Rights (2000 / C 364/01) and the European Pillar of Social Rights [Egner et al., 2020].





Fig. 6 Social Housing in Pristina, Kosovo

Fig. 7 Collective housing in Pristina, Kosovo, built in 2017

nisms.⁵ The funds collected from rents were used for building maintenance, as well as for the construction of new housing, but they were not even sufficient to cover the basic costs of repairs (Jelinić, 1994). The construction of public housing faced a crisis in the 1980s, due to the lack of financial resources resulting from a generally weakening economic situation in Yugoslavia. However, it is also known that the socialist system created new urban inequalities through inappropriate housing policies and unfair distribution of public housing, which resulted in social division (Szelenyi, 1983, cited in: Spevec and Bogadi, 2009: 457). With the partition of the former Yugoslavia, when Kosovo became part of Serbia, riots broke out; the policies of that time also affected the housing market because the government tended to differentiate societies. This period of privatization continued until 1999, when the 1998-1999 conflict broke out. Because of the war in 1998 and poor housing policies before and after the war, the housing problem in Kosovo has been rather severe (Sylejmani, 2018: 30).

• Housing policies after 1999 – The post-war period affected the field of construction in all categories, including housing. As the new state did not inherit any legislation from the past, plans, building laws and other official documentation in the early 2000s were no longer applicable. In a nutshell, the previous policies were no longer carried out.

The period of 2000-2002 was a period supervised by UNMIK. According to the rating given by the UNMIK Department of Reconstruction, during the 1999 war, about 120,000 houses and ancillary housing facilities were completely or partially damaged, making up 30% of the total stock. The political conflict had devastating effects on Kosovo's economy. Mass migration to the cities in search of housing and jobs began to occur due to difficult economic conditions⁶ and damage done

to infrastructure and housing. This increased the demand for housing in all urban areas in Kosovo. The phenomenon of illegal construction and development of settlements in an uncontrolled manner was expressed throughout Kosovo (Institution for Spatial Planning, 2010).

A new law on spatial planning was drafted with the assistance of UN-Habitat and approved by the Kosovo Assembly in July 2003. With the assistance of UN-Habitat, a new Institute of Spatial Planning was established, putting academic theories in practice by drafting spatial plans throughout Kosovo. Considering that at that time almost none of the institutions were fully functioning, the Kosovo Spatial Plan 2010-2020+ was finally approved by the Assembly of Kosovo in June 2011, and this strategic plan for spatial planning has been in force ever since.

In 2004, for the first time after the conflict, the Law on Construction was adopted and enforced, and it aimed at regulating construction in Kosovo, at harmonization with the European Construction Standards, the protection of safety and the environment, as well as at improving the quality of life of the citizens. This law was later supplemented and improved.

Due to all the issues that developed because of the conflict, there was poor investment in the development of housing policies in Kosovo. One of the important issues was the law on Financing of Special Housing Programs (Fig. 6). The purpose of this law has been to create conditions for sustainable housing for families or individuals who are not financially able to afford the offerings of the free housing market and to determine the manner of provision and use of the financial means for the development of separate housing programs (Parliament of the Republic of Kosovo, 2010).

Most of the investment in housing was already from the private sector (Fig. 7). In the absence of plans, laws and technical regulations, there was a decrease in the quality of housing driven purely by profit. After all the efforts to drafting laws, plans and other documents that improve the quality of housing in the state of Kosovo, there have also been constant attempts to create, supplement and improve existing ones. However, as a result of a lack in proper planning, almost all new neighbourhoods of multi-family housing, in all cities of Kosovo, have overwhelmingly turned out to be chaotic urban areas.

In addition to the above parameters, a phenomenon that has affected the planning is illegal buildings, both in individual and collective housing. In the Balkan region, as well as in Kosovo, many illegal buildings have been built, gravely affecting the urbanization of settlements. In Kosovo, a significant number of illegal constructions was identified in 2013: 353,000 (Table III). This occurrence has been continuously more present in rural areas and in the construction of individual houses, yet, after the recent conflict, illegal constructions of collective buildings have begun in the cities of Kosovo as well.

Illegal constructions affected urbanism (Fig. 8), compromised the property market, and affected the precarious possession of property because illegal buildings could not be registered in the cadastre or legally transferred, used, or used as collateral (USAID, 2016). To help the legalization of these buildings in 2014, the Law on the Treatment of Illegal Constructions was adopted, which was completed in 2018 (Parliament of Republic Kosovo, 2018). Despite the continuous work of institutions, the legalization process is slow.

COMPARATIVE REVIEW OF HOUSING POLICIES IN EUROPE AND KOSOVO

Aiming to improve housing issues, housing policies include government actions such as legislation and program delivery affecting housing strategies, housing standards, and urban planning.

Referring to the review of the researched material, we can encounter a significant differ-



ence in the treatment of housing policies between Kosovo and developed European countries. A significant element is the cost of investing in housing policies. According to the data in Europe, the cost of financing by GDP varies from country to country, but it is the lowest in Kosovo. This reduces the development of housing policies, as research shows that investment is a key element for improving housing standards and proper

planning.

Another influential factor in improving housing are legislative issues, which affect housing standards and urban planning. Due to a number of political events, Kosovo has had many shortcomings pertaining to legislation and many of the principal issues have not been legally defined. Developed countries, on the other hand, do not have such legal gaps. Attempts to improve the quality of housing through legislation have prompted continuous efforts to align with laws in Kosovo, but there are still shortcomings in this area. They look to developed countries in Europe or worldwide and their alignments of legislation to achieve decent housing: for example, the Netherlands, which offers their citizens quality and sustainable housing by applying a practice in which each city with more than 10,000 inhabitants is required to update and approve plans for future expansion. General and detailed plans are required, and the master plan must be updated every ten years (Franic, Korlaet, Vranic, 2005: 199). Furthermore, housing standards in European countries are strictly defined, while in Kosovo these standards are constantly being changed and updated (Table IV). The large

FIG. 8 ORTHOPHOTO OF NEIGHBOURHOOD "DODONA", MOST OF THE RESIDENTIAL BUILDINGS ARE ILLEGAL CONSTRUCTIONS. PRISTINA. KOSOVO. 2021

TABLE III NUMBER OF ILLEGAL CONSTRUCTIONS IN BALKAN COUNTRIES

	Number of illegal constructions
Kosovo	353,000
Albania	500,000
Greece	2,500,000
Federal Republic of Macedonia	350,000
Montenegro	130,000

TABLE IV MINIMUM APARTMENT FLOOR AREAS, A COMPARISON BETWEEN EUROPE AND KOSOVO⁷

Apartment type	Europe	Kosovo
Studio apartment (1 person)	39 m²	36 m²
1-bedroom apartment (2 person)	46.3 m²	45 m²
2-bedroom apartment (4 person)	73.3 m²	72 m²
3-bedroom apartment (5 person)	91.3 m²	87 m²

^{5 &}quot;In 1987 the rent was only 2% of personal consumption, and does not depend on the location and quality of the apartment or on the family income."

⁶ Regarding to Council of European Bank, GDP per capita was the lowest in the region. Growth was directed mainly by foreign aid (close to 50% of GDP in 2002), remittances (30%) and public spending.

⁷ The area of apartment for Europe is made from the average derived from European countries: Ireland, England and Croatia. The table shows the difference between the standards of apartments in Kosovo and Europe, where similar design standards are observed.



FIG. 9 New social housing in Sluseholmen and prefabricated units in Copenhagen's central areas. Denmark

number of buildings, market competition, the applicability of laws and many other factors have contributed to improving the quality of housing in co-ownership. In recent years we can find good examples of multi-family housing construction in Kosovo, which meet not only the functional aspect of housing, but can be categorized as buildings that meet the current requirements of quality housing based on European standards. However, the urban issues such as: traffic, infrastructure, parking spaces, green spaces, pedestrian and cycling paths, recreational spaces are important elements that influence the quality of housing in Kosovo.

In Europe, collective housing currently deals with special housing programs (Fig. 9). Some countries have started to apply affordable rent and access to inexpensive housing. In Kosovo there are social housing programs, but they are treated separately in each municipality. Deficiencies in the application of such housing programs can be particularly observed in larger cities. However, systemic affordable housing programs are still not being implemented in any city of Kosovo.

CONCLUSION

A comparative analysis of housing policies in EU countries and in Kosovo has shown that there is a significant difference between them. Kosovo lacks investment in the devel-

opment of housing policy strategies, there is a difference in the updating of plans and, at the same time, there is a lack of subsidies in special housing programs.

The practices of European countries that offer good housing conditions showed that it is very important for the state to invest in housing policies. Kosovo would also benefit from such a practice. There are some issues related to housing policy which increase the quality of housing, such as the national strategy of housing, updated plans, increased supply of affordable and social housing and a sustainable and healthy environment ensured for all citizens. Kosovo as a new state has a lot to learn from well-established practices of developed European countries (such as: the Netherlands, Austria, Denmark) in the realm of the improvement of the housing stock.

European practices show that the state must plan the expansion of urban areas in advance and the plans have to be constantly updated. Given the economic and social problems, securing a home is quite difficult for many middle-income families. Therefore, subsidizing and supporting the financing of housing by the government would affect the improvement of housing. European practices show that an appropriate mechanism for resolving the housing stock for all categories of residents is affordable and social housing. However, the aim of the government should not only be to provide a roof over the head for its citizens, but it should also be to provide good housing conditions. It means offering multifamily housing with suitable standards for living and residential neighbourhoods that meet the criteria of quality housing and a sustainable neighbourhood. Given the current situation, with a particular emphasis on Kosovo's urban areas, the means and opportunities for improvement are small. However, an innovative housing and urban policy, as well as referring to good practices of Western Europe, can improve current issues.

The presented research has tackled housing policies in Kosovo that will be researched and further elaborated more thoroughly in the future. It also opened the theme of exploring other Balkan countries which have gone through a period of transition, some addressing housing problems at a more advanced level than Kosovo.

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Sources of illustrations and tables

Figs. 1-2,

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Fig. 3 Lulko, 2017

Fig. 4 Cousins, 2008

- FIG. 5 APZ "Plan" (1980s) *Idejni urbanistićki* projekt: Sunćani breg [A3] Personal archive of architect Sali Spahiu, Pristina.
- Fig. 8 Orthophoto [online]. Available at: http:// geoportal.rks-gov.net/search?municipalityId=19 [Accessed: 28 March 2022]

Fig. 9 TSENKOVA, 2022

TABLE I Housing Europe, 2021

TABLE II Kosovo agency of Statistics, 2013

TABLE III Ministry of Environment and Spatial Planning (MESP), 2013

TABLE IV Department of Housing, Local Government and Heritage, 2020: 5; Department for Communities and Local Government, 2015: 11; MZOPUG, 2004; MESP, 2016

AUTHORS' BIOGRAPHIES AND CONTRIBUTIONS

SAFETE VELIU REXHEPI is a Kosovar architect and a teaching assistant at the Faculty of Architecture and Spatial Planning at UBT College, Pristina.

KRISTINA CAREVA, Ph.D., is a Croatian architect and associate professor at the Department of Architectural Design at the Faculty of Architecture, University of Zagreb.

MIA ROTH-ČERINA, Ph.D., is a Croatian architect and associate professor at the Department of Architectural Design at the Faculty of Architecture, University of Zagreb.

Conceptualization: S.V.R., K.C. and M.R.Ć; methodology; S.V.R; software; S.V.R., K.C. and M.R.Ć; validation: S.V.R., K.C. and M.R.Ć.; formal analysis: S.V.R.; investigation: S.V.R; resources: S.V.R; data curation: S.V.R; writing — original draft preparation: S.V.R.; writing — review and editing: S.V.R., K.C. and M.R.Ć.; visualization: S.V.R.; supervision: K.C. and M.R.Ć; project administration: S.V.R. funding acquisition: S.V.R., K.C. and M.R.Ć. All authors have read and agreed to the published version of the manuscript.

