

tion, and, in particular, the last lacks a comprehensive treatment in most chapters. In addition, some chapters, notably Six, Seven and Eight, in their relative focus on the unsystematic presentation of information about arrangements and policies in different countries, reflect the limited range of the literature.

It is intended that each of these chapters could be of particular assistance to students who wish to undertake cross-national studies of specific aspects of housing policy, perhaps investigating approaches to state involvement with land development and its control and collectivization of the benefits of any increase in land values, or national approaches to social housing provision. The chapters provide an introduction to the literature as well as some data which can be used to locate each country relative to other industrialized countries, as well as some specific country examples. Like the literature, these data, and the range of countries, are also uneven, reflecting their varying availability in secondary sources.

The final chapter (Twelve) picks up on one of the key themes in the second, namely that comparative study can help the learning of policy lessons. It presents some of the literature that has examined questions of which policies work best. This, of course, begs the further question: what do we mean by 'best'? In this regard, a number of different criteria are explored. It also begs the question of what policies would travel: in other words, what would actually work in the same way in another country. Whereas, at one level, these questions are very practical, the answers can also provide theoretical insights about why governments have housing policies, indeed welfare policies in general.

# 1

## Housing Policy: Origins and Variations

Housing is a necessity. It is precisely because it is a necessity that people will always find somewhere to live. This will not always be a well-built, spacious and permanent dwelling with a full range of facilities. In some societies, financial pressures may well force many to live in self-built shanty dwellings sited on illegal sub-divisions and without proper sewerage systems or formal schools; others will illegally squat; some will inhabit dwellings with short-term and insecure contracts; yet others will be forced to live with parents or friends; others to sleep in the metro or in shop doorways. For some, living in a horse-drawn van or squatting may be matters of choice made around lifestyle decisions, but, in general, the solutions people find will reflect the level and stability of their incomes and the cost of various alternative housing solutions. In general, the so-called 'Iron Law' of housing operates: that those groups in societies with the greatest command over material resources will live in the biggest and highest quality homes and those with least command will find the lowest quality solutions; and, for the latter their housing circumstances will be socially unsatisfactory.

Among the advanced industrialized countries, however, there are no examples of governments being prepared to allow the continued existence of a housing system in which all citizens have been left to search only among free market alternatives. In all such countries, governments have intervened to alter the range of solutions available, the balance of advantage and disadvantage of different solutions, and the means of access to them. They have introduced measures to modify the quantity, quality, price, access and control of housing, and in so doing they have also modified the 'Iron Law'. A feature of all governments of all industrialized countries, then, is that they have taken it upon themselves to become involved with this necessity. Whatever the ideological

predilections, the level of industrialization, the demographic or social characteristics, the climate or the availability of building materials, **governments have intervened widely and deeply with the production and consumption of housing.** Moreover, there are grounds for suggesting, following Harsman and Quigley, **that, although governments intervene widely in all major areas of welfare – health care, education, pensions and so on – as well as with some other goods and services, the interventions in housing are substantial:**

All developed countries have a housing problem in some form, and all nations regardless of their orientation towards free markets or central planning, have adopted a variety of housing policies. **The production, consumption, financing, distribution, and location of dwellings are controlled, regulated, and subsidized in complex ways.** In fact, compared to other economic commodities, **housing is perhaps the most tightly regulated of all consumer goods.** (Harsman and Quigley, 1991, p. 1)

### Housing problems

Given the universality of housing problems and of government intervention, the question can be asked: what is the nature of the problems which all this policy is seeking to address? In other words, are there, or have there been, practical difficulties which have stood in the way of individual citizens enjoying an acceptable level of housing? Burns and Grebler (1977) have suggested that **the problems can be described in terms of four types of disequilibrium,** a term which in this context they use, not in the usual economic sense of a disparity between supply and demand, but **as a disparity between the stock of dwellings, on the one hand, and the quantity which is deemed to be 'needed', on the other.** There can, under this definition, be an absolute shortage of adequate housing which cannot be closed in the short term by the price mechanism. One consequence is that some people may be without housing of a satisfactory standard or without housing at all.

**The distinction, therefore, is between the concept of demand,** which is one taken from economics and refers to the ability and willingness of the individual consumer to pay for housing, **and the concept of need,** which is a socially accepted aspiration describing that standard of adequacy which society as a whole adopts as **an expression of the collective interest.** Although they have been posed as alternatives they are not in fact independent. What societies adopt as an adequate standard will not be unrelated to the real economy, that is to the 'incomes

and prices prevailing in the country concerned' (Needleman, 1965, p. 18). Where there is a real commitment to ensure that needs are met, the concept of social demand can be useful. This describes the ability and willingness of society, as a collective, to pay for housing. Although it is not necessarily the case that all interventions in housing markets will result in a greater consumption of real resources or public finances, **nevertheless housing policy itself can be approximately equated with the concept of social demand.** On this view, **the decisions by governments to intervene in housing systems have the effect of replacing, or modifying, individual demand, as the principle governing housing outcomes, with social demand.**

The Burns-Grebler discussion of disequilibria can be presented in the light of the distinction between these concepts, with disequilibria being thought of as statements of need, which governments may choose to translate into statements of social demand. **Static disequilibrium refers to the overall disparity between the number of dwellings in a geographical unit such as a country and the number of households.** Of course, both sides of the disparity may be inter-related, for example because household formation may be constrained, or facilitated by, the availability of satisfactory housing, but, overall, **static disequilibrium provides a crude measure of the current adequacy of the national stock of housing.**

**Dynamic disequilibrium refers to the trends over time in static disequilibrium and thus to the combined trends in housing stock and households – as to whether the disparity is widening or narrowing.** **Spatial disequilibrium indicates the mismatch that may occur within the different parts of a country.** Over a country as a whole there could be a balance between houses and households, or even a housing surplus, but the houses are not necessarily located in those regions where the households want to live. **Spatial disparities can occur where there is rapid migration from rural to urban areas,** perhaps associated with processes of industrialization, or with a reduction in employment opportunities in those urban areas whose economies are heavily skewed towards declining industries combined with an increase in employment in growth industry areas. **In other words, there can be shortages in some locations and surpluses in others.** The final measure is qualitative disequilibrium which denotes that some households may be living in accommodation that falls short of a standard that would be acceptable to society at large. The accommodation may be deemed too small for the number of people living there, it may be missing facilities such as an internal WC, adequate heating arrangements or a fresh water

system, or it may have too limited an ability to protect those living there from the elements.

Given that the Burns-Grebler disequilibria represent a way of describing, in general terms, the housing problems with which governments of all advanced industrialized countries are faced, one question is whether they are actually the stimuli for policy making. There has been an assumption among many of those who have studied housing policy over the last 30 years that **policy can be interpreted unequivocally as part of a process whereby governments react to the housing problems facing its citizens** (perhaps, as here, described in terms of disequilibria) **such that the objective is to increase their wellbeing, welfare or quality of life.** On this view, therefore, policies start from the difficulties facing individual citizens – homelessness, overcrowding, insecurity of tenure, insanitary conditions – to which governments respond in the form of housing policy in order to improve these housing conditions.

But, as we shall explore in later chapters, the view that the welfare needs of the citizens of industrialized countries are an automatic trigger for the introduction of social policies is contestable. **The belief that humanitarian concerns constitute the sole, or even partial, basis or trigger for housing policy, overlooks other possibilities, for example that policy may fulfil a function in stabilizing the economic and political system as a whole.** Governments may intervene, in other words, in ways that improve the lot of those who would not otherwise be able to consume housing of a reasonable size and quality, but such an outcome is a consequence of an underlying motivation to preserve the social order. There may be a distinction, therefore, between what policies achieve in improving the housing system and what they are intended to achieve in providing a wider stability.

The argument here, then, is that whereas in all countries there are, or have been, circumstances that can be described in terms of need and disequilibria, and at the same time all industrialized countries have enacted housing policies, **the two cannot necessarily be seen as part of a stimulus response system.** The possibility of alternative links makes the understanding of the nature and origins of housing policy both a difficult and a fascinating task. It is further complicated because of both spatial and temporal variations. **Whereas all industrialized countries have enacted housing policies, there is nevertheless a very wide range of forms taken by those policies. Thus in some countries there is an emphasis on direct provision, in others on regulation, some concentrate more on production, others on consumption, and so on.** Equally, there may be changes in policy over time. In other words, there is an histor-

ical dimension to policy as from time to time governments repeal old legislation and enact new legislation. The stimulus for such change may be developments in the nature of housing problems, in changing perceptions of need, or perhaps in ideological developments which may lead governments to become more or less inclined to intervene in processes of supply and demand.

### The European paradigm

One way of exploring the spatial and temporal variations is by drawing on the presentation of what Bullock (1991) calls **'the European paradigm'**. In this he traces what he asserts to be the typical historical development of national experiences of housing and the associated housing policy. Since the paradigm constitutes a number of stages, which can be tied to historical periods or milestones, when the nature of problems, or the perception of them, changed, it usefully **emphasizes the historical dimension of national housing policy systems.** However, here, it is also used as an **ideal type or model** against which the developments in individual countries can be compared.

Bullock's starting point is the suggestion that whereas eighteenth century observers of housing had expressed **'objection to inadequate housing or overcrowding'** (Bullock, 1991, p. B004), the nineteenth century saw the linking of the phenomenon of urbanization with the **sanitary reform movement which was spurred by the widespread occurrences of typhoid and cholera.** Under this pressure the mid-century response was typically that governments took responsibility for imposing regulations which would ensure the greater healthiness of those living in the rapidly expanding urban areas. Housing problems were viewed as products of urbanization and industrialization arising from the dysfunctional consequences of free market solutions.

**In Bullock's view, a second, typical stage occurred from the 1880s on. Housing came to be seen less as a health issue and more as an economic one, with a recognition that the incomes of the great mass of national populations were too low to enable them to afford the market price for adequate housing.** In this growing awareness, the appropriate role of government was again re-assessed. The greater willingness to countenance intervention found expression in the **development of non-profit alternatives to the free market.** As Bullock recounts it:



In England, for example, enabling legislation is enacted so that cities like London may now build and manage their own municipal housing estates. In Germany, as in France, government is now for the first time prepared to sanction the use of funds at lower than market rates of interest as a source of capital for the housing co-operatives and associations of the fledgling non-profit sector. (1991, p. B004)

Both world wars marked turning points. The First World War was accompanied by a radical, two-pronged approach. Governments adopted regulatory frameworks aimed at rent levels and security of tenure in private rental housing. In addition, they embarked upon large-scale programmes of subsidized housing. The widespread destruction caused by the Second World War, the cessation of new building for half a decade or more and the large-scale movements of population, all contributed to a need to build quickly and in large numbers. The standard response was the mass building of social housing, a response which conformed with wider, welfare state developments. Since the mid 1970s a further turning point has been reached with the typical running down of social housing programmes, as part of a general pressure on welfare states.

So, overall, within the European paradigm the view is one in which housing problems were increasingly recognized from the end of the eighteenth century on, the interventions became more and more comprehensive with a growing emphasis, particularly in the post Second World War period, on social housing solutions, but with a retreat from government responsibility over the last twenty years. To what extent does this accurately describe the historical development of housing policy approaches in European countries? Most observers would undoubtedly recognize elements, particularly in those European countries in the middle latitudes, such as Britain, Germany, France, Belgium and the Netherlands, which experienced mass urbanization and industrialization in the nineteenth century. Actually, the British position fits very closely, as we describe here.

### *Britain*

The basic structure of the British solution to meeting housing needs was established during and shortly after the First World War. Until that time, consistent with what has been referred to above as the European paradigm, housing in Britain was a good produced and allocated according to rules which operated in a largely unregulated market.

Government legislation had, it is true, been having an impact in controlling some of the worst aspects of the market, such as excessive densities and inadequate sanitary arrangements, but market forces remained the dominant ones. However, the market-based approach was resulting in outcomes which were deemed unacceptable. A rent act in 1915 introduced both controls on rents, which tied them to historic rather than current market levels, and security of tenure. With the private rental sector at this time accounting for around 90 per cent of the housing stock, this legislation had the effect of fundamentally changing the balance between the collective and the private interest. In turn, this new balance contributed to the long-term decline of the sector. No longer able to charge rents that reflected market scarcity landlords chose to move out of the business, while tenants increasingly turned their aspirations to other housing opportunities.

The first of these alternatives was developed through further legislation in 1919 setting up arrangements which were to result in the rapid, and eventually extensive, development by local authorities of a public housing solution. Momentum had been growing for two or three years supporting the view 'that some sort of state aid would have to be made available' (Malpass and Murie, 1994, p. 51) and the issue by 1919 was rather more about the appropriate vehicle for doing so. Providing subsidies through private builders would have been a technical possibility, but was rejected. The government in the end built on the established tradition of local authority responsibility for the provision of local services. The remaining part of the housing system, the 10 per cent held in the form of home ownership, was also set at this time for an extended period of growth. Increasing national prosperity extending into higher real wages and greater job security, combined with the growing resources of the building society movement, facilitated the growth of demand.

The period of reconstruction immediately following the Second World War saw a policy shift even further towards a collective responsibility for housing. Indeed, the concept of public housing as a social service was consistent with the wider development of the welfare state in postwar Britain. At first, all new housing was provided by local authorities so that the size of the public housing stock grew rapidly. This period of mass building of council housing continued more or less unabated for two decades, at first making good the postwar shortage and later linked to slum clearance mostly in the major centres of population. With government support for home ownership being gradually re-asserted and then extended, for example through generous tax subsi-

dies, this sector also continued to grow. Through the 1960s and 70s, housing policy could be described as having two main strands: market provision for those who could afford it, and state provision for the rest. Home ownership was seen as the normal tenure, which those with the greatest command over resources would normally seek to attain. Subsidies to home owners facilitated the expansion of the sector so that by 1970 over half the population had achieved this form of tenure. For those who were unable to meet the financial commitments of home ownership the council sector, having grown to around one third of the stock by 1970, was the solution. But, as indicated by its size, it had more than a residualist role, and was a tenure aspired to by a wide range of working people. This two-sided policy could be seen as a reflection of the broadly balanced strengths of the two main political parties.

A major policy shift started to develop in the 1970s (see Forrest and Murie, 1988). As part of the breakdown of the postwar consensus around the welfare state, itself apparently tied to growing economic difficulties, support for the council housing solution was beginning to wane. With the election of a radical conservative government in 1979 pursuing ideals of state withdrawal and the re-assertion of markets in all areas of welfare, housing policy became focused narrowly on the extension of home ownership. The collective solution through state provision was to be dismantled through legislation which would encourage the transfer of council housing into the home ownership and private renting sectors. The 1980s' solution was thus more reliant upon the market as the appropriate institution through which housing needs would be met.

### *The Netherlands*

If we accept that Britain is archetypal, equally most observers would also recognize that the paradigm is not actually common throughout Europe. There are not only the exceptions of those countries whose capitalist trajectories were truncated by their annexation into the communist east, but also those European countries which experienced mass urbanization and industrialization much later than those of the industrial heartland. Thus Portugal, Spain and Greece to the south, while sharing many of the same responses, such as the public health concerns, have seen much of their housing policy developments confined to the second half of the twentieth century. But, even where the time frame was similar to that in Britain, the policies themselves

have often been very different in both detail and general philosophy. The case of the Netherlands, summarized in terms of tenure in Table 1.1, provides an example.

**Table 1.1** Tenure patterns, selected countries, 1990 (%)

	UK	Netherlands	USA	Japan
Owner occupation	68	44	64	62
Social renting	25	44	3	8
Private renting	7	12	33	24

Source: Hallett (1993); Hägred (1994).

The pre World War Two housing policy in the Netherlands was based on private investment with legislation authorizing the construction of social housing, dating back to 1901, being 'used only as a stopgap' (van Weesep and van Kempen, 1993, p. 185). The postwar era saw a major shift in direction, a direction which was heavily influenced by two factors. First was the shortage of housing, which had resulted from the combination of war damage and the lack of construction during the war years. However, for Dutch governments the housing problems took second place to the wider problem of reconstructing the country's economy, leading them to impose strict controls on prices, wages and investments. In housing terms this meant a continuation of the rent control imposed at the start of the war, and a relatively modest programme of new construction. The second factor was the Dutch political model which is based on wide representation which helps to ensure 'a fair degree of continuity in housing programmes, even when government coalitions change' (van Weesep and van Kempen, 1993, p. 184). The overall outcome of these factors has been that 'Dutch housing policy since 1945 has been one of the most comprehensively interventionist in western Europe' (McCrone and Stephens, 1995, p. 75).

The postwar solution was based on the construction of social housing. As in Britain, the early postwar years saw a dominance of this form of new provision with a gradual shift in favour of subsidized and non-subsidized housing. Unlike Britain, the local authorities were rather minor players in the production of social housing, this role being entrusted to housing associations. This orientation also had its roots in the act of 1901, which according to van Weesep and van Kempen (1993) had led to a heated debate from which the widespread suspicion of direct state provision was expressed by politicians as being too

strongly associated with state socialism. What developed was a sector founded on the philanthropic organizations that had developed in the previous century and that came to be organized largely along ethnic, religious and regional lines. Although the numbers increased in the inter-war period, after the war they first expanded rapidly in size and subsequently grew even larger through mergers.

However, local authorities were also significantly involved in the regulation of the social housing sector. Social housing received 'bricks and mortar' subsidies, with operating subsidies also being made available. The price to be paid was that landlords were faced with restrictions on rent levels, and access to housing was also determined by regulations which set down certain criteria that households needed to meet in order to qualify for a home.

Although production levels increased in the 1950s, the overall shortages remained. It took a large production boom in the 1970s to more or less close the gap. By this time the social and non-social rental sectors had expanded to around 60 per cent of the national housing stock. At this point there was a move to shift the burden away from state subsidized production and consumption of housing to the free market. However, the demand for home ownership weakened considerably with a widespread collapse of prices and confidence, and the government continued to support social housing programmes. Nevertheless, from the middle of the 1970s there have been changes as the Dutch government has sought to reform elements of its housing policy system. The shift away from 'bricks and mortar' subsidy was part of a recognition that the numbers problem had been solved. It was accompanied by a greater reliance on transfer payments to tenants to enable them to afford the higher rent levels, although a reaction to the resulting increase in public spending has been the capping of such payments. Likewise pressure on public spending has led the Dutch government to withdraw state loans for new production in an expectation that housing associations seek finance from the private sector. A White Paper published in 1989 has set out the principles for the 1990s and beyond. They herald an even greater targeting on the needs of the lowest income groups and more reliance on the market and private capital. As McCrone and Stephens conclude:

the Netherlands seems to have realized that, in the present fiscal climate, a policy on the scale of the past cannot be sustained. If the radical proposals for the social rented sector are implemented, together with the measures already in train, Dutch policy could become one of the least costly, instead of being one of the most expensive. (1995, p. 95)

### The USA

The European paradigm, then, disguises inter-country differences, but further it is precisely that: a model or paradigm which is confined to Europe. North America has travelled along a different route, not because its cities did not grow, or that their inhabitants did not experience many of the same sorts of problem as their European counterparts. In the USA, rather, the government was not prepared to develop a social housing sector on anything like the same scale as in many European countries.

In the United States the predominant ideology, throughout the present century, has been, much more than in Europe, centred upon the notion that the individual, and not the state, is responsible for his or her own destiny. Government has seen itself in the role of ensuring some measure of equality of opportunity rather than some measure of welfare. The ideological tradition has also included an emphasis on private ownership. The result, as Wolman suggests, is that social policy is:

largely designed to play a derivative and residual role. Americans are expected to provide for their needs themselves... social policy is 'selective' - that is, it applies only to the residual not able to provide for themselves and utilizes a means test to identify who those are. (1975, p. 4)

This observation may seem not to fit with the establishment in the Housing Act of 1949 (reaffirmed in 1968) of a national commitment towards the achievement of a decent home for everyone. But in practice the US government has placed little priority on housing, certainly if this is measured by the proportion of the federal budget expended on housing programmes. Wolman (1975) speculates about the causes of the schism between stated intention and outcome, between acceptance of a social services philosophy but not the approach. He suggests that there is both a lack of consensus about the goal as well as competition from other housing goals. In addition, the statement could be seen as an expression of a desirable outcome, but not one that the federal government bears the responsibility for achieving, not least because of the role of local and state governments in fulfilling social programmes.

American housing policy derives its roots, not as in Europe from the shortages and tensions resulting from each of the two world wars, but from the profound shock of the 1930s' Depression. The concern was not primarily about the acceptance of a state responsibility for ensuring that citizens' housing needs were adequately met, but with finding a



way out of the economic difficulties through planning at the macro level. Providing an impetus to the construction industry and maintaining confidence in the mortgage market were seen as significant steps in seeking to reinvigorate a depressed economy.

What developed was a housing policy regime strongly oriented towards the private sector in general and home ownership in particular. The promotion of home ownership had dated back at least until 1913 when the federal income tax code provided tax relief to be set against mortgage interest payments and local property taxes, an initiative which was 'conceived as an important incentive for promoting widespread home-ownership' (Howenstine, 1993, p. 25). The continuation of such tax breaks along with support to the mortgage industry in the wider context of a strong cultural predilection towards home ownership saw the achievement of this form of tenure by a large proportion of the population, in excess of 60 per cent, as early as 1960.

In contrast to Britain, the private rental sector was not so disadvantageously treated. On the one hand, rent control in the United States was not traditionally seen as 'an appropriate device, partly for ideological reasons and partly due to the widespread belief that it would not work' (Wolman, 1975, p. 42). On the other hand, tax policy gave sufficient incentives to investors in residential property to encourage the maintenance of a large presence.

Public housing had been part of the New Deal in the 1930s, but it has never been encouraged sufficiently for it to make a major impact on the challenge of meeting housing needs. Even in the 1930s there was powerful opposition to the concept of public housing, but after wider acceptance in the postwar era, its potential was even more limited, according to Howenstine, because housing authorities were 'required by law to evict families, when their income rose above original eligibility limits' (1993, p. 24). However understandable as a means of ensuring that public housing was reserved for the very poorest members of society, it had a consequence of producing a highly stigmatized sector which, in the long run, has lost its widespread support. Table 1.1 shows clearly the resulting insignificance of non-market forms of housing.

The election of President Reagan into his first term of office in 1981 heralded a shift even further towards market solutions and away from social objectives in general. Silver (1990) provides details of the changes with respect to housing. The administration cut spending on new construction with the annual output being reduced from 45 000 to 7 000 units. At the same time rents were raised by 30 per cent, and

subsidies increasingly took the form of vouchers which could be redeemed in the private sector. In addition, programmes were introduced that encouraged the sale of public housing units. Overall, then, the 1980s was a decade in which the federal government in North America saw even less need for its own involvement in meeting housing need.

### Japan

The case of Japan demonstrates yet further variation. Here, in 1941, the majority of the housing stock, around 75 per cent in the cities, was owned by private landlords (Hayakawa, 1990, p. 676). The great changes that have been brought about over the subsequent half century have been the result of intervention by Japanese governments. There have been a number of factors that have been important in steering these. With the exception of 1947, Japanese governments have been run by the conservative party. Much of the land area of Japan is not easily habitable having twice the population of the UK and West Germany, but only a quarter of their habitable land areas. The large scale urbanization, particularly after 1955, has squeezed the population into the densely packed cities. Numerically, the postwar period has witnessed an increase in the proportion of urban dwellers from under two-fifths in 1945 to almost four-fifths by 1990.

A rent control ordinance of 1946 undermined the economic viability of private renting and had the result that landlords sold their dwellings to tenants and the building of new owner-occupied housing increased. In short, this legislation marked the 'start of the increase in postwar home ownership' (Hayakawa, 1990, p. 676). The large-scale urbanization fuelled the demand for the building of additional housing. Between 1945 and 1985 34 million private dwellings were built, this figure representing about 85 per cent of the total. The Japanese housing solution has therefore been predominantly a private sector one, reflecting the ideological orientation of its ruling conservative party.

But, there has also been some housing built by the public sector. Over the same period about 2.6 million dwellings have been built by local authorities. Treasury subsidies are used to build houses which are let at low rents. Eligibility for the dwellings is limited to those with incomes below specified levels and living in unsuitable accommodation. Whereas in 1951 the income limits encompassed around 80 per cent of the population, by 1987 this had been reduced to 20 per cent

(Hayakawa, 1990). This has clearly acted to suppress the demand for this type of housing. Moreover, the consequence of a tenant's income rising above the prescribed limit may be that they are required to vacate the property. The Housing and Urban Development Corporation also receives public funds which it uses to meet housing objectives, including the provision of both rental and housing for sale.

Not only does the policy system as a whole contrast sharply with that in European countries, but the individual dwellings are very different. They are small in terms of floor area, with adjustable interior space and minimal furnishings, which reflect the traditional lifestyles in which men have worked long hours, entertainment has been carried out outside the home and cooking is minimal (Donnison and Hoshino, 1988). So, whereas residential street scenes in European cities as well as in many cities in the USA often have much in common, those in Japan can be very different.

## Conclusions

In all advanced industrialized countries governments have taken the view that they should have considerable presence in their housing systems. Although people will invariably find somewhere to live, no government has been willing to allow all their citizens to make provision for themselves within a framework that has been entirely unstructured by government. Nowhere, in other words, has there been a free market in housing in which outcomes have been solely determined by the unfettered actions of individual suppliers and consumers. In fact, in comparison with many other goods, perhaps reflecting the fact that housing is an essential item of consumption, the level and nature of intervention in housing has generally been considerable.

If intervention in the form of housing policy is common to all advanced industrialized countries, little else seems to be. Whereas Bullock's European paradigm may be useful as a reference point from which to start locating the development of national housing policy systems, few countries fit neatly. Britain with its transition from health to economic concerns, and the policy milestones being established at the times of the two world wars clearly fits very well. But, many countries, now industrialized, have become so according to a quite different time scale. Moreover, even those countries with a similar time scale have developed housing policies that are very different one from the other. Thus, whereas the Netherlands developed a policy system based

upon renting and private, non-profit landlords, Britain pursued a twin track of owning and public sector renting. Even these two countries do not represent the full spectrum of policy models, as the case studies of the USA and Japan indicate.

In addition to the variation from country to country, the paradigm also indicates the variation from time to time. Housing policy systems are organic so that they do not develop to some predetermined model. They grow in some ways and contract in others and they change direction. There may be many reasons underlying the developments – demographic, ideological, economic – with each country developing at different stages in time. One of the challenges facing the would-be comparativist, therefore, stems from the fact that there are variations in housing policies over both time and space.