the amenities are of a quite different character than suburban developments. Rather than the focus being on individual yards and perhaps a neighborhood pool, urban residential developments are large multifamily buildings where amenities include retail and cultural opportunities conveniently located within walking distance or available by mass transit. Such urban residential amenities may differ substantially by climate and culture. For example, the shared open courtyards of the Mediterranean may be less functional in the colder climates of Scandinavia.

While various cultural and climactic circumstances can impact the design and function of housing, many characteristics are consistently important for housing satisfaction across regions, nations, and cultures. In studies of residential satisfaction in Japan, Western Europe, and the United States, the presence of noise from traffic or neighbors has a dramatically negative effect on residential satisfaction. Although greater size is typically associated with higher residential satisfaction, the characteristics of the space, especially the inclusion of areas such as multiple bathrooms that allow for zones of privacy, are more important in determining residential satisfaction. However, many of the factors that drive residential satisfaction do not relate to the physical structure of the home itself. For example, a variety of studies have shown that perceived neighborhood safety and security is a driving characteristic of residential satisfaction.

Individual housing choice may be driven by specific characteristics, but almost inevitably, broad location choices are based on available employment. In nations where public school availability is based on housing location, such extra-housing characteristics can also drive housing choice for families with children. As with many issues within urban studies, the goal of residential satisfaction can be achieved only with a combination of successes at the individual, neighborhood, community, city, and regional levels.

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See also Affordable Housing; Housing Policy; Housing Tenure; Social Housing; Suburbanization

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Housing Policy

Housing policy may be defined as government action to achieve housing objectives. These objectives could include the improvement of the quality of the housing stock of dwellings or dealing with homelessness. Another definition of housing policy would be government intervention in the housing field. The difference is that some interventions in the housing field may be directed at objectives outside the field. Examples could be the regulation of housing finance markets to influence activity in the national economy or restrictions on the amount paid in subsidy to low-income households to encourage incentives to

work. Research shows that increasingly more housing policy is directed at economic objectives of efficiency in the national economy with the result that housing policy is increasingly becoming intervention in the housing field to achieve economic objectives.

This entry seeks to examine the objectives and mechanisms that are used by governments in their housing policies; look at categorizations of countries constructed according to their housing policy; consider the forces that shape the similarities and differences in housing policy in individual countries; and examine the scope of individual governments to define their own national policy.

Government Objectives

Governments may have a number of objectives in the housing field. One set may relate to the supply and condition of the housing stock. For example, many countries have policies to ensure that new housing is built to stipulated standards. Also, many countries will intervene to improve the condition of existing housing, such as through slum clearance or upgrading. Policy may also be directed at the quantity or location of new production.

Another set of objectives may relate to the consumption of housing. Intervention may be directed at the legal structures of tenure that determine the rights and obligations of the parties involved. Another area of intervention is access to housing, usually for low-income groups. Thus housing finance and subsidy systems may be designed to enable households with low incomes to access housing that otherwise they could not afford and may be related to policies on income distribution and the alleviation of poverty.

Policies may also be aimed at the functioning of housing markets. Governments set the framework within which markets operate and may intervene to stabilize or change the level of activity.

To achieve these aims governments may use a variety of forms of intervention. One may be the direct provision of housing, as in forms of state housing such as council housing in the United Kingdom. Regulation is another form where the state will influence the actions of other parties by setting standards or frameworks. An example would be building codes or regulations. Another common form is a system for the regulation of new development through a land use planning system. Subsidies may be used to influence the behavior of either housing developers or consumers. Intervention may take the form of the provision of information or guidance to the relevant parties. An example could be the provision of information on the legal rights of tenants. Government also sets the framework of accountability that can make parties respond to the needs of particular groups. An example may be the institutional structure of public housing, which may be run by local councils with tenants having rights to be consulted.

Categorizing Housing Policy

Individual countries will vary in their mix of housing objectives and forms of interventions. There is a substantial literature on the categorization of these differences and the factors that explain them.

Much work has followed the welfare state regimes approach of Esping-Anderson. He was not specifically concerned with housing but with the identification of three categories or regimes of welfare state as a whole. The first category is the liberal regime in which can be included Britain, Ireland, and the United States. The second category is the conservative regime—and the examples used are Germany and France. His third category is social democratic, and examples are Sweden and Denmark. Housing researchers have used his categorization and have sought to identify the housing models that relate to each type.

For example, in the liberal regime, housing is dominated by market provision, primarily owner occupation but also private rental. Direct government provision is usually small scale and limited to the poorest of the population, which means it is usually stigmatized and unpopular. State help for the poorest is often directed through housing elements of income support programs such as housing allowances or vouchers. The emphasis is on choice through participation in markets. Help for the poorest may also be reflected in support for homeless people, either through the state or voluntary organizations. Further state intervention is in the form of regulation of the market, for example

by setting frameworks for financial institutions or for land use planning.

In contrast, the social democratic regime is characterized by substantial direct state provision of housing aimed not just at the poorest. Housing is viewed as a right for citizens, and state responsibility for homeless people may reflect this. Housing finance mechanisms may be designed not only to help the poorest but to achieve egalitarian aims. State intervention in the housing market may be extensive and designed to change market outcomes to reflect social aims.

The conservative regime is characterized as corporatist in nature with partnerships between government and long-standing social institutions such as churches or professional or trade groups. Provision of housing is often through these institutions and vehicles such as housing associations that serve the interests of their members. The state may protect these institutions from market competition. The access of households to housing may depend on their relationship to these institutions rather than on market participation or state conferred rights.

Other categories of housing regime have been considered. For example, there was been much debate in the 1990s about whether or not there is an Eastern European model. Clapham and others have argued for the existence of an East European model based on state ownership and distribution, centrally planned production; housing was all but free at the point of use, and market mechanisms were excluded. It is argued that this model never really existed in a pure form because of a shortage of resources and the costs and difficulties of achieving state control. Political changes in the late 1990s meant that democratically elected governments pursued policies of privatization and market freedom and most moved quickly to a liberal regime.

Others have argued for a separate category for southern Europe, where there is generally a reliance on extended family structures for the provision of housing through self-build. Housing policy in many of these countries is undeveloped compared to northern European countries. Eastern countries such as Japan or China also have very different housing systems and policies that do not seem to fit the three regimes.

Convergence or Divergence

The second major area of debate and academic research has been on the movement over time of these models and the scope for individual countries to vary their systems. The major schools of thought have been divided into the convergence and divergence approaches.

Convergence Approaches

The convergence approach stresses the similarities in the movement of housing policies over time, usually based on the economic sphere. This is sometimes called the "logic of industrialism" approach and is associated with "end of ideology" theories. There are a number of different examples of this approach. One idea is that welfare states change as the rights of citizenship develop, and one author suggested a move from a focus on civil rights to political rights and then social rights. Donnison adopted this perspective on the development of housing policy identifying embryonic, social, and comprehensive models, which bear more than a passing resemblance to Esping-Anderson's later classification.

Examples of embryonic states were given as southern European countries such as Portugal or Greece, which have more recently become industrialized states with the concomitant urbanization. In these countries, the states had only just begun to intervene in the housing system, partly because housing is seen as a consumption good and the priority has been given to economic development.

The second category of social states included countries such as United Kingdom and the United States, where the primary aim of government is to come to the aid of people who cannot secure housing for themselves through the market. Interventions are designed to rectify particular problems or deficiencies in the market and do not reflect a government responsibility for the housing of the whole population, which is the defining element of the third category—the comprehensive model. Examples given are Sweden and the former West Germany where governments have taken a long-term view of their involvement in housing. Donnison argued that states moved along the continuum from embryonic to comprehensive as they developed economically. However, the credibility

of this analysis has been hit in recent years by the retrenchment of many welfare states despite increasing affluence.

A very different example of a convergence approach is that used by Ball, Harloe, and Martens. They argued that common economic forces move housing policies in broadly similar directions, although the uneven spread and speed of economic development means that countries start from different places and move at different speeds. They highlighted the common trend across many countries of commodification that involves a reduction and restructuring of state involvement in housing and the growth of market provision. These common trends do not necessarily result in similar housing policies or systems because of what the authors term the *structures of provision* in each country. By this they mean the institutions and cultures that structure the housing field and through which policy is perceived and policy decisions made.

More recently, focus has been on the impact of globalizing economic trends. For example, Clapham has shown how the discourse of globalization has been adopted in the United Kingdom and has lead to constraints on the state that impact on the housing sector. For example, the perceived need to support entrepreneurship has resulted in constraints on the ability to fund government action through taxation on high earners. Also the deregulation of financial markets has reduced the ability of governments to intervene in housing markets by making ineffective traditional policy instruments such as credit controls. At the same time, the perceived need to increase the flexibility of labor markets to increase economic efficiency has changed the focus of housing policies. Geographic mobility is seen as being important in enabling people to follow employment opportunities, and so flexibility in housing with new-house production in growing areas and low mobility and transactions costs are given prominence in policy. Another key policy area is the need to design policy to avoid or minimize income disincentives and poverty and employment traps to reinforce incentives to work. Acceptance of the discourses of globalization and flexible labor markets seems to be associated with neoliberal housing policies that emphasize market processes and outcomes.

Divergence Approaches

The second major approach is the divergence approach. This sees countries as differing substantially in their housing systems despite similar levels of economic development and does not see them as necessarily converging. It is argued that political ideologies and cultural norms differ and profoundly influence the shape of housing structures. Kemeny and Lowe use the work of Esping-Anderson on different kinds of state welfare to point to the influence of political ideology in shaping state policy. In his own work, Kemeny examines the nature of cultures of homeownership in different societies, arguing that these are related to different political philosophies of individualism or collectivism. In homeowner societies, Kemeny argues, government housing policy is related to socially constructed ideologies and cultural myths that vary between different societies. These are used to justify special support for owner occupation and measures to prevent cost-renting from becoming too large and a competitive tenure.

Common measures are the stigmatization of tenants of cost-rental landlords or the forced sales of housing stock. In cost-rental societies, the state-subsidized sector dominates private rental provision, and government may intervene to create a unitary system in which the rights and obligations of tenants are similar and state institutions regulate access and conditions in the private sector. In these societies, cost-renting can compete with owner occupation for middle-class households and so will not be stigmatized.

The distinction between convergence and divergence approaches is increasingly questioned because it does not uncover the underlying bases of the different approaches but concentrates on and overemphasizes one of the outcomes of their application. In other words, the key issue is not whether different countries are converging or diverging. Rather, it is which factors are the key influences on policy. The approach of Ball and Harloe is loosely based on what may be termed a realist position, whereas Kemeny's approach is built on social constructionism. Clearly, this leads to different emphases and conclusions on the factors to be taken into account in examining housing policy. However, the two approaches have more in common than is immediately apparent. Convergence approaches reduce to a residual important factors that explain the evident

differences between countries. Furthermore, convergence approaches do not develop a theoretical position that can explain divergence or any differences in the direction or speed of social change. For example, Ball and Harloe identify structures of provision in each country, which they argue are at the core of differences between countries. However, this is seen as a sensitizing concept to alert researchers to recognize differences. The concept lacks a theoretical underpinning that would allow an analysis of why differences exist and why they may change over time.

The areas of agreement of the different approaches are great. Some common trends are driven by the globalizing forces of advanced capitalism. Globalization may be seen as a socially constructed discourse accepted and promulgated by governments and economic agents or as a real economic force. But, this difference of view does not necessarily hinder agreement on the impact of globalization on housing policy in different countries. General trends can be identified, such as marketization, liberalization, and the restructuring of state intervention from direct provision and subsidy toward forms of regulation. In addition, there has been a move by governments away from social objectives in housing policy and toward economic objectives.

However, there is not a clear and direct relationship between this level of change and institutional housing structures and state housing policy in particular countries. Some of the differences may be due to the position of different countries in the globalized economic world. Also, governments may differ in their acceptance of the globalization discourse or their openness to global economic forces. The scope for political choice in responding to globalizing trends is an important matter of debate. The degree of freedom of maneuver may be influenced by many factors including existing institutional structures and political discourses and ideologies.

The need for an effective housing policy is felt by governments in many different contexts. The problem may be the failure of housing markets in the declining parts of older cities in Western countries or the counterpart of the rapidly expanding need for new housing construction in economically thriving areas. In rapidly developing and urbanizing countries such as India or China, there is a need to ensure that housing standards are high and that cities expand in efficient and sustainable ways. An effective housing policy is a major instrument of urban policy, and the successes and failures of housing policies can explain the developing features of cities across the world.

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See also Affordable Housing; Homeownership; Housing; Housing Tenure; Social Housing

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Housing Tenure

Housing tenure refers to the possession of residential real estate. The term tenure stems from the Latin *tenere,* meaning "to hold." *Homeowner* and *renter* distinguish individuals with permanent or temporary possession of property. About 70 percent of Americans own their home, and 30 percent rent. Homeownership is the cornerstone of American conceptions of prosperity. High numbers of homeowners are equated with economic and social well-being. Increased numbers of renters are viewed as a sign of diminishing prosperity.