

COMPARATIVE WELFARE STATES

HOUSING POLICY IN NORTH AMERICA AND EUROPE:

INSTITUTIONAL ANALYSIS AND WELFARE STATE REGIMES

United States, Canada Britain, Germany, France, Sweden, Netherlands, Denmark,
Italy and Greece

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Prepared by

**Lawrence A. Souza, CRE
Johnson/Souza Group, Inc.
Principal – Real Estate and Financial Economist
Santa Clara University/Golden Gate University
Adjunct Professor – Real Estate Finance
42 Jersey Street
San Francisco, CA 94114
Office: (415) 826-2216
Direct: (415) 713 – 0213
Lsoua@JohnsonSouzaGroup.com
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COMPARATIVE WELFARE STATES HOUSING POLICY IN NORTH AMERICA AND EUROPE: INSTITUTIONAL ANALYSIS AND WELFARE STATE REGIMES

INTRODUCTION

Housing is an essential factor in determining the quality of lives, the stability of communities, and the health of national economies. Its importance to society is underscored by the fact that housing accounts for a significant portion of personal-public consumption expenditures and gross private domestic investment in most North American and European countries. The housing sector is a leading indicator of economic activity, and a lagging indicator of social welfare. The public and private housing sectors are extremely sensitive to changes in monetary and fiscal conditions, and social, political and welfare policies.

In most industrialized countries housing quality is high; however, affordability and access have become a major issue. In developing countries, longstanding problems of low quality and high relative cost have been exacerbated by high rates of population growth and country-to-city migration, and by urban infrastructures that are ill equipped to accommodate residential growth.

Direct government assistance for housing in both industrialized and developing countries generally has been more extensive than in the United States. With the adoption of housing acts (Housing Act of 1949), the United States and other North American and European countries have formally pledged itself to the goal of providing "a decent home and a suitable living environment for every family." Nevertheless, the definition of what is "decent" has varied according to economic conditions, political climate, and prevailing tastes. Furthermore, *in most European countries the responsibility for producing housing and delivering housing services relies on both the public and private sectors; while in the United States, the responsibility for producing housing and delivering housing services remains almost exclusively in the private sector.*

This first section of this paper will discuss housing policy and institutions under various theories: functionalism and stratification, modernization, neo Marxian, and institutionalism. The second section of this paper will categorize and explore similarities and differences between housing policy and performance under various welfare regimes: social democratic (Netherlands, Denmark, Sweden, and Norway), liberal (United States, Canada, and United Kingdom), conservative-corporatist (Germany and France), and Latin-conservative-corporatist (Italy and Greece) regimes.

The last section of this report analyzes economic, demographic and housing statistics for each regime. The goal is to identify structural and fundamental differences between housing policies in various welfare state regimes. Discussion of results, conclusions and recommendations, and anticipated usefulness of results also follow.

STATEMENT OF PURPOSE

The purpose of this study is to discuss urban housing policy and performance across various countries, categorized by welfare state regime. The goal is to identify significant housing institutions, policies and programs that affect housing supply, demand, quality, access, etc.

Statement of Specific Research Objectives

Cross-sectional-country analysis to find out and analyze:

- Institutional factors affecting housing policy and production: Institutions, policies and politics.
- Housing policy goals, objectives and performance: social democratic, liberal, and conservative - corporatist.
- The chronology and evolution of significant housing policy: politics and policy.
- The drivers of housing demand: policy, demographics, economics, etc.
- The drivers of housing supply: policy, production, industry, firms, etc.

METHODOLOGY

The methodology used in this study has been separated into seven parts: 1) data collection, 2) identification of research questions and hypotheses, 3) institutional analysis, 4) definition of welfare state regimes, 5) analysis and reasons for housing policy and institutions, 6) housing policy comparative analysis and 7) comparative data analysis.

- Explanations for the creation of housing institutions, policy and production utilize functionalism and stratification, modernization, neo-marxian regulation and institutionalism for theoretical analysis and application.
- Definition of welfare state regimes utilizes Gosta Esping-Andersen's analysis and categorization to identify the three worlds of welfare capitalism: social democratic, liberal and corporatist.
- Analysis and reasons for housing policy and institutions utilizes the logic of welfare policies and welfare states.
- Housing policy comparative analysis actually looks at specific country housing institutions, policies and production biases.
- Comparative data analysis utilizes social, demographic, economic and housing statistics categorized by welfare state regimes.

Historical analysis is utilized in the collection, chronology and categorization of significant historical events and policies. Particularly historical events and policies that have impacted supply, demand, quality and access for housing.

This categorization by welfare state regime makes the case for housing policy bias over time. Historical, qualitative and quantitative analysis takes collected articles, books, and data, and applies techniques to assess the relationship between dependent variable (housing production) and independent variables (policy, demographics, economics, etc.):

- | | |
|---|---|
| <ul style="list-style-type: none"> ▪ Housing Construction (Units/Permits) ▪ Housing Construction Per Capita ▪ Housing Construction % of Total Stock ▪ Average Age of Housing Stock ▪ Housing Affordability (Index) ▪ New and Existing Home Prices | <ul style="list-style-type: none"> ▪ Rental Vacancy and Rental Rates ▪ Mortgage Institutions-Capital Markets ▪ Mortgage Interest Rates ▪ Public-to-Private Housing Stock Ratio ▪ Public-Private Housing Production ▪ Developable Land & Land-Use Controls ▪ Local-State-Federal Land Use Plans |
| <ul style="list-style-type: none"> ▪ Homeownership/Renter Housing Ratios | |

DATA COLLECTION

Data collection for this study involves secondary sources. Sources of information are mainly government agencies, private research institutions, public and private universities, industry groups, websites and online data and article sources. Sources of information used in the historical and data analysis come from:

- U.S. Department of Commerce, Bureau of the Census
- Federal Reserve System
- U.S. Department of Labor
- National Association of Realtors
- Construction Industry Board
- Department of Housing and Urban Development (HUD)
- World Bank
- International Monetary Fund (IMF)
- Organization for Economic Cooperation and Development (OECD)
- Eurostat
- International Centre for Research and Information on the Public and Cooperative Economy (CIRIEC)
- The European Liaison Committee for Social Housing (CECODHAS)
- The European Federation of National Organizations working with Homeless People (FEANTSA)
- United Nations
- Confederation of Family Organizations in the European Community (COFACE)

RESEARCH QUESTIONS & HYPOTHESES

Research Questions

Based on review of the economic literature and housing policy history, this study tries to answer basic research questions relating to urban housing policy and factors driving supply and demand for housing in North America and Europe.

Answers to these questions put North American and European urban housing policy in a historical context; and reveals legislative, psychological, economic, demographic, financial and institutional drivers of institutional and policy development, drivers of supply and demand, and ability to meet policy objectives and outcomes.

Housing Policy Questions

- How did housing policy in North America and Europe arise?
- Were institutions and policies a response to an immediate crisis widely perceived by the general public?
- What body of the government and agency or agencies is (are) charged with developing and administering housing policies and programs?
- Do different welfare regimes produce different housing policy outputs: production, affordability, access, etc. What are the impacts on the general public and social welfare?
- What types of regimes and countries produce the best policy outcomes in regards to: production, affordability, access, and social welfare-satisfaction?

Housing Economics Questions

- What are the legislative policy (Monetary/Fiscal) drivers of housing supply and demand?
- What are the economic (GDP/Employment/Income) drivers of housing supply and demand?
- What are the psychological (Consumer and Business Confidence) drivers of housing supply and demand?
- What are the market (Home Prices/Affordability) drivers of housing supply and demand?
- What are the demographic (Households/Population) drivers of housing supply and demand?
- What are the institutional (Financial/Lending System) drivers of housing supply and demand?

Hypotheses

Hypotheses tests of data specifically address urban housing policy issues: regimes, institutions, and policy; and the economics of housing supply and demand. Limits to the number of hypotheses tested are determined by the scope of research, data availability and analysis plan. These hypotheses are tested for significance using observational techniques, and if possible, correlation analysis and OLS regression analysis. A comprehensive list of hypotheses are given below, the actual number hypotheses tested will be limited based on time, data availability and scope of the research.

Housing Policy Hypotheses

H1: Housing policy grew out of social, cultural, economic, and housing crises.

H2: Lack of quality housing and rising health concerns lead to legislative action.

Housing Economic Hypotheses

H1: Housing demand is positively correlated with economic development -- Gross Domestic Product (GDP).

H2: Housing demand is positively/negatively correlated with employment growth/unemployment rate.

H3: Housing demand is positively correlated with housing preferences and public choice.

H4: Housing demand negatively correlated with home price appreciation, and positively correlated with housing affordability.

H5: Housing demand is positively correlated with growth in homebuyer demographic cohorts.

H6: Housing demand is negatively correlated with number of persons per household.

H7: Housing demand is positively correlated with income growth (standards of living).

H8: Housing supply is positively correlated with Gross Domestic Product (GDP).

H9: Housing supply is positively correlated with housing preferences-public choice.

H10: Housing supply positively correlated with employment growth, and negatively correlated to unemployment rates.

H11: Housing supply is positively correlated with home price appreciation.

H12: Housing supply is positively correlated to growth in homebuyer demographic cohorts.

INSTITUTIONAL ANALYSIS

Institutionalism

Housing institutions and policies can be analyzed through the use of institutional analysis. Lane and Errson view institutionalism as an innovation in social science and analysis of institutions. An institutional approach to analyzing social behavior compared, contrasted and integrated with other social science disciplines: behaviouralism rational choice, structuralism, economics, etc.

Institutions can be defined in many different ways: rules, norms, sanctions, socially organized activities, order. Neo-institutionalism is defined as a norm or a system of organs or offices. Other definitions of institutions are:

- 1) an established law, custom, usage, practice, organization or other element in the political or social life of a people;
- 2) a law pointing toward norm interpretation, an organization or organ, a regulative principle or convention subservient to the needs of an organized community or the general ends of civilization;
- 3) an established, organization or association, instituted for the promotion of some object, especially one of public or general utility;
- 4) verbal symbol which describes a cluster of social usages, a way of thought or action of some prevalence and permanence, embedded in the habits of a group or customs of a people;
- 5) codified into a set of rules such as a written constitution, declaration of rights, majority rule, separation of powers, or public education;
- 6) constitutional norms, subject to controls, use of sanctions against behavior that violates rules, codes of conduct, shape behavior of particular groups,

Rational choice institutionalism sees institutions through rule interpretation, while sociological institutionalism sees institutions through organizational interpretation. ***Neo-institutionalism*** analyzes institutions within a game framework, where actors participate, negotiate, and strategize to maximize individual welfare by following, utilizing, and being constrained by, the rules of the game and structure of the playing field. Institutions can also be seen as social institutions, providing stable, valued and recurring patterns of behavior or outcomes. Economic benefits, social order, morality, ethical behavior, distributional justice, etc can measure actions and outcomes of institutions.

Institutions can come in many different social, organizational, cultural, economic, and rule based forms (maxims): family units, class, national assemblies and legislatures, political parties, economy, religion, corporation, unions, police-military, private property, legal system and codes, state administration and agencies, etc. Political institutions can be bureaucratic agencies, legislative committees and appellate courts, all contending with social forces; but they also can be collections of standard operating procedures and structures that define and defend values, norms, interests, identities and beliefs.

Sociological neo-institutionalism looks at the physical structure, demographic structure, historical development, personal networks and temporal structures of institutions. Depending on the institutional structure of the organization -- connections between other institutions or its members, rules of the game, participants, administrative procedures, external events, etc. -- may provide opportunities for institutional innovation, change and growth. ***Rational choice***

institutionalism challenges holistic and sociological approaches by analyzing how decision rules affect outcomes when groups come together and aggregate individual preferences. Rational choice institutionalism is influenced by information economic theories (Coase, Stigler, Arrow, etc.), and how institutions affect economic outcomes: liability, private property rights, search costs, agency, asymmetric information costs, etc.

WELFARE STATE REGIMES

The Three Worlds of Welfare Capitalism

Welfare states-capitalism are/is characterized by distinct systematic development and organization of policy programs, policies and outcomes: housing, woman labor force participation, population growth, education, welfare income distribution, public pensions, education, healthcare, etc. Welfare regimes are a larger constellation of socio-economic institutions, policies and transfer-oriented programs: tax, consumption, production, etc.

Esping-Andersen believes these welfare state regimes are organized around its own logic or organization, stratification and social integration; and are defined as the ways in which welfare production is allocated between state, market and households.

- **Liberal Regimes:** *United States, United Kingdom, Australia, Canada, Japan and Switzerland.*
- **Corporatist Regimes:** *Germany, France, Austria and Belgium.*
 - **Latin Conservative-Corporatist Regimes:** *Spain, Portugal, Italy, Greece*
- **Social Democratic Regimes:** *Netherlands, Sweden, Denmark, Norway.*

SUMMARY OVERVIEW OF REGIME CHARACTERISTICS			
	LIBERAL	SOCIAL DEMOCRATIC	CONSERVATIVE
Role of:			
Family	Marginal	Marginal	Central
Market	Central	Marginal	Marginal
State	Marginal	Central	Subsidiary
Welfare State:			
Dominant mode of Solidarity	Individual	Universal	Kinship Corporatism Etatism
Dominant locus Of solidarity	Market	State	Family

Degree of Decommodification	Minimal	Maximum	High (bread-winner)
Examples	USA	Sweden	Germany/Italy

It has been argued that a comparative history of housing policy is worthwhile, with a focus on policy borrowing, and political bargaining between housing and other matters of policy intervention. Across Europe, there are different mixes of housing allocation, clustering in different ways than welfare regimes do (Matznetter, 2001).

Social Democratic Regimes

Esping-Andersen, Goodin, Headey, Muffels and Dirven identify Social Democratic Regimes as being institutional redistributive models of the social welfare state. This type of welfare regime values:

- Values economic efficiency and attaches importance to equality.
- Assigns the state and active role in being responsible for promoting welfare of citizens.
- Is rooted in socialist economics where the state has a powerful redistributive role.
- Is characterized by: class politics, socialist economics, and redistributive social policies.
- Is a reaction to social consequences of free market economics and liberal politics.
- Its fundamental value is social equality, where it transforms political equality, via democratic class struggle, into economic-social equality.
- Ranks highly the elimination of poverty and reduction in class-cast distinctions.
- Promotes the ideal of social citizenship, full participation, equal worth, equal opportunities, equal access, and equal resources.
- It neutralizes-weakens the power of private capital in: wage bargaining (regulation-nationalization), labor exploitation, systematic advantage through rules of property, structure of competition to pay less, and relations of production.
- It strengthens labor, implements full employment policies, legislative training and labor exchanges, education, and public employment.
- The majority support narrower welfare-state interventions, soft social democrats committed to social equality, redistributive goals, decommodification, equal distribution

of income and wealth, allocation of goods and services, egalitarian, progressive taxation, redistribution of resources, deep social equality, equal worth, full participation in community, enhance economic equality and personal autonomy.

- Old age pensions, child benefits and family allowance, are universal entitlements: state subsidies, universal flat-rate benefits.
- Incurs free rider problem and principal agent problems.
- Believes in trust of people's character and motive through social reinforcement.

Liberal Regimes

Esping-Andersen, Goodin, Headey, Muffels and Dirven identify Liberal Welfare Regimes as residual welfare models of social policy and positive state intervention. This type of welfare regime values:

- Places high importance on economic efficiency.
- Assigns individuals primary responsibility for economic and social well-being, the state has a passive role.
- Is rooted in capitalist economic premises where the state has a residual social welfare role.
- Is characterized by liberal politics, capitalist economics, and residualist social policies.
- Fundamental value is of government being neutral, not crusading, not promoting basic values; and freedom from interference.
- Endorses capitalist acts, promotes relations of free exchange, and mutual benefits.
- Strives for maximum benefit of social welfare, high disposable income and low tax rates.
- Leaves as much to free market.
- Macro policy response (fiscal-monetary) to labor market failure.
- Tightly targeted income and social service benefits.
- Employment-categorical program and qualifications to sort out unwilling-unable workers.
- Tries to facilitate labor exchanges and avoid welfare dependency through punitive welfare state, a response to undeserving human distress.

- Operational goal to alleviate poverty, provide social minimum, utilization of mean tests, screening, and forced work.

Conservative-Corporatist Regimes

Esping-Andersen, Goodin, Headey, Muffels and Dirven identify Corporatist – Conservative Welfare Regimes as industrial achievement or performance based models to create a Social Security State. This type of welfare regime values:

- Economic efficiency, placing more importance on social integration and social stability.
- State is active or passive according to responsibilities, assigns primary responsibility for welfare to individuals and social units: families, guilds, corporations, etc.
- Is rooted in communitarian social market economics.
- Welfare regime is facilitator of group-based mutual aid and risk pooling.
- Is characterized by group politics, communitarian economics, and mutualist social policies.
- Residual of pre-industrial feudal forms, teaching of Catholic Church. Fundamental value of social cohesion and integration, station and duty, fraternity and brotherhood, solidarity and belonging, attachment to community.
- Groupings: primary social group (family), patriarchal, breadwinner model, labor force attachments.
- Family policy, allowances, child benefits.
- New communitarianism, soft corporatism.
- Social cooperation and collaboration between capital and labor, mutual recognition, division of labor, specialization, social market economy, peak associations, interest group intermediation, unanimity, no one left out, and every group has a veto.
- Policy responses: ensure people properly integrated into groups, take care of their own, mutualist approach, aid across groups to promote growth.
- Subsidiarity: local church, voluntary associations, professional-occupational associations, municipality, etc. Charitable duties, mutual aid, insurance and reciprocal charity.
- Risk pooling, insurance, assurance; primary role of state is to underwrite and facilitate private-self governing groups, residual risk pools.

- Basic goal of security and stability, no surprises, everyone taken care of, preserve existing social order, patterns of distribution, threat from individualism, adverse selection.

ANALYSIS OF HOUSING INSTITUTIONS

Introduction

In the 19th century, industrialization, improved transportation, and large-scale immigration led to the rapid expansion of urban areas. In the mid-to-late 1800s, urban populations around the world doubled to meet labor needs of both public and private sectors centralizing and concentrating in urban cores. In major industrial cities much of this growth was accommodated in government and industry sponsored tenement-common flats (Fish, 1979).

Despite widespread public recognition of worsening urban housing problems and frequent calls for reform, government efforts were undertaken to improve housing conditions. In some countries, continued influx of immigrants and changing demographics resulted in the proliferation of overcrowded tenements and deplorable health conditions.

Attempts to improve housing were spurred by the writings from reformers and reports commissioned by federal housing agencies to gauge housing conditions and set new standards. During times of economic crisis, home building came to a standstill and the rate of mortgage defaults and foreclosures became intolerably high. Emergency programs and policies were enacted to establish housing institutions focused on curing and preventing mortgage market failures, underwriting and supporting housing production, and providing access and affordability for citizens.

Reasons for Housing Policy

Robert E. Goodin, Bruce Headey, Ruud Muffels and Henk-Jan Dirven give reasons for states to provide welfare (housing services) are: governments-incumbents wanting to stay in power, government legitimization and credibility, improving human capital investment-productive services, provide poor with consumption capabilities, promotion of nationalism-patriotism, social-economic harmonization, morality-ethics, etc. Different countries internalize their values and act in different ethical and ideological ways, operationalizing, weighting and ranking them in different priorities, representing social consensus and external standards of assessment:

- 1) Promotion of *Economic Efficiency*: constraint on social action that result in inefficiencies and hinder economic growth, equity vs. efficiency; however, welfare policy cures temporary labor market failure. Welfare policies risk upsetting instruments and institutions working to promote welfare, incentives. The value of efficiency is morally agnostic, but is not the ultimate value, only relative.
- 2) Reduction, Prevention and *Relief of Poverty*: dependent on the relative (moral) definition of adequate, needs, poverty; and determined by society: minimalist position,

basic requirements for physical function, food, clothing, shelter, staying alive, nutritional minimum, social-physical functioning, necessities, material resources, to participate in ordinary life, etc.

- 3) Promotion of *Social Equality and Redistribution*: distribution under different rules, equal under law, equal concern and respect, equal status, equal opportunity, equal outcomes, equal welfare, social equality: specific egalitarianism, local justice. Food, housing and healthcare, money income, in-kind services, unemployment benefit, old age pension, full employment policies. Determined under theory of local-distributional justice, rights of social citizenship, right to work, etc. Derivation of social status, self-respect, satisfaction, self-realization.
- 4) Promotion of *Social Integration-Cohesion* and Avoidance of Social Exclusion: Community, fraternity and solidarity, social idealism. Family welfare policies, taking care of members. Distributional justice: dividing, exchanging, sharing goods and power, mutual aid, social capital. Protect, nurture, complement and strengthen intermediary institutions (family), communitarianism, provide social safety net, etc. Avoid social exclusion, marginalization, particularly those culturally and racially distinct.
- 5) Promotion of *Social and Family Stability and Protection*: Integration into communities, promote security and stability of overarching social structures, stability in personal lives. Stabilize income, prevent sickness and industrial injury, provide social insurance against lost wages, disability benefits, support people in retirement close to working wage, less effective in achieving social equality, preservation of pension, social status (earnings-related benefits), provide social arrangements to promote sense of self, identity.
- 6) Promotion of *Personal Autonomy, Individualism and Independence*: Unlock those trapped in poverty, prevent those from falling into poverty, avoid exploitation and manipulation. Provide welfare rights, basic income without conditions, social assistance, underwrites autonomy and independence, help women escape domination and become economically independent, avoid exacerbating inequalities and enforcing dependency (male breadwinner model), encourage female labor market participation, give equal entitlements, unconditional state support, enhance freedom and independence (positive freedom), avoid welfare dependency.

Reasons for Government Intervention in Housing Market

Across North America and Europe, housing policy has been developed to motivate both supply and demand sides of the equation. These policies are intended to alleviate chronic shortages of housing and the ability of lower income groups to afford housing services. It is estimated that up to 33% of the population in Europe can not afford the full cost of occupied-housing, indicating market failure and a reason for government intervention in the housing market (Balchin, 1996).

Demand can be motivated through fiscal and monetary accommodation: lower interest rates and mortgage underwriting standards, and increased housing expenditures, tax advantages (capital gains and interest deductions) and supports, subsidies and allowances. Supply can also be

motivated by fiscal and monetary accommodation: increased public investment in public housing construction, lower interest rates and mortgage underwriting standards for construction loans, accelerated cost recovery and depreciation allowances for housing, tax advantages (capital gains and interest deductions) for apartment loans, low-no interest new construction and renovation loan supports, grant subsidies and tax allowances (Balchin, 1996).

Factors Driving Supply and Demand for Housing

Demand Factors

Housing demand is a preference for housing services subject to constraints of income and price. The household is the basic unit of housing demand, and as defined by the U.S. Census, a household is the person or group of people who jointly occupy a dwelling unit and who constitute a single economic unit. Determinants of household formations are the number of total households, economic and demographic characteristics, tastes and preferences, prices of substitute and complementary goods, and expectations (Carn, 1988).

The passage of the baby boomers, Gen X, and the emerging Echo Boomers will be especially important in determining the number and type of housing units required in the next 25 years, because household formations and the demand for second homes vary systematically with the age of individuals. Differences in housing demand remain fairly stable over long periods of time due to regular patterns of income, income expectations, assets, family status and preferences of the life cycle. Demographic factors affecting housing demand are: rate of household formations, size and age-mix of population, and household size. Other factors affecting housing demand are inflation and deterioration (Marcin, 1975).

The demand for housing is similar to any other commodity. The demand function is negative; therefore, if home prices rise rapidly, demand at some point declines. The price elasticity of housing is affected by tax treatments, interest rates, cost of construction and maintenance and repairs. If any of these cost factors drive up the price of homes, demand is affected negatively (Harrington, 1989). Other factors important to determining demand for housing services are: permanent income, marginal tax rate, income growth, expected rate of return on housing, family size and location of home (Haurin, 1989).

Increasing demand for housing is also reflected in rates of home price appreciation. Factors contributing to home price appreciation rates are: cost inflation, employment growth, real income growth, and change in interest rates (Abraham and Hendershott, 1996). Housing demand is the quantity of housing desired by households individually and in aggregate. Housing demand is negatively related to the price of housing, and positively related to household income. As the price of housing falls due to lower interest rates, construction costs or real tax burdens, the demand for housing, or household formations, increase (Pozdena, 1988).

Demand-Side Policy Tools

During the late 1970s, rapidly rising housing costs due to hyper-inflation replaced poor conditions as the major housing problem, and vouchers were considered less expensive than

building new units. During the 1980s and 1990s, under the U.S. Republican administrations, federal government involvement in housing production virtually stopped (Vliet, 1998).

Demand-side subsidies go to housing consumers and lower the cost of consuming housing services. Subsidies make it more affordable for households to purchase or rent a home. Subsidies come in many forms: direct cash payments, housing allowances or vouchers, or preferential homeownership tax treatment. In the U.S., the largest subsidy comes in the form of preferential tax treatment of mortgage interest payments, as opposed to Section 8 vouchers.

Housing allowances involve cash payments to households, but in many cases, money is paid directly to landlords. The value of the voucher is directly related to local rent levels, household size and income. Payments are restricted and determined by maximum income levels.

The acceptance and use of vouchers in America reflect the perception that housing problems are a question of affordability. By giving vouchers to low-income households, they receive more buying power and are able to meet housing costs and compete for housing in the market. This policy tool is favored over other forms of subsidies because it allows for targeting specific socio-economic groups; therefore, is superior to production subsidies. However, these vouchers may also push rents higher in a given market due to rising effective demand, thereby, benefiting housing suppliers and developers without addressing the problem of housing shortages.

Preferential tax treatments for homeowners come in the form of paying less tax. Tax expenditures are reduced through tax deductibility of interest payments on home mortgages. This program is inequitable in the sense that it benefits those with high incomes and expensive houses, is inefficient in allocating scarce resources, increases the value of homes above their economic value, and distorts housing choice. This policy tool is fiscal and political in nature and not a good housing policy rule.

Housing subsidies in the form of vouchers and allowances and reduction in tax expenditures are appropriate policy tools in periods of slack demand, and should be used only when increasing demand brings about benefits without creating economic inefficiencies or social injustices.

Supply Factors

Housing supply can be thought of as stock of units, flow of services or quality of accommodations from the stock. The census, estimates that there are over 102.3 million dwelling units in the U.S.

Housing supply is not easy to determine due to the difficulty of assessing and measuring the supply of available land for development. But it is assumed that in the long run housing supply is infinite, and that developers will find a higher and better use of the land, and if that means building up or tearing down an existing structure, they will.

It has been found that housing construction is determined by roughly six factors: level of historical housing starts, rate of household formations, rate of removals, number of vacant units, rent growth, and interest rates (Smith, 1970).

Rapid home price appreciation, above construction costs, give developers incentive to produce more housing, but before developers will develop, they must be convinced that consumers are confident enough in the current employment and economic environment to consume housing services (Weber and Devaney, 1996). The market for new homes depends partly on consumer attitudes and perceptions embodied in consumer confidence indices.

The true relationship between private housing starts and the economy is a function of the money supply and overall performance of national output measured by GDP. Historically, it has been shown that growth of deposits at savings and loans was a significant determinant of housing starts in 1966 and 1971 in the U.S., but not in other years (Johnson, 1982).

Supply-Side Policy Tools

Supply-side subsidies go to suppliers of housing and reduce the costs of provision. These subsidies reduce the cost of providing housing by builders and landlords. Subsidies can take the form of direct cash payments, fiscal concessions on taxes, reductions in loan payments, subsidized mortgage interest rates, loan underwriting warranties, or land grants for development (Vliet, 1998).

Supply-side programs in the U.S. are limited in nature. Supply-side programs seek to increase the supply of housing through construction or support for housing providers. The U.S. 1937 and 1956 Housing Acts provided for government involvement of slum clearance and construction of affordable housing units.

Two U.S. government supply-side program programs are Section 202 and Section 221(d)(3). These programs are designed to provide new housing for seniors through non-profit community development corporations. By the 1990s, production of new Section 202 projects had dwindled to 6,000 units per year, compared to 20,000 units in the late 1970s.

The principle purpose of supply-side housing policies is to reduce housing shortages, reduce unemployment, and promote economic growth. Over the years policy makers have been criticized by the large-scale poorly planned housing developments produced in the public sector, reducing support for supply-side programs. Supply-side programs allow the government to influence the design, location, occupancy and rent levels of housing. Critics see government involvement as lacking in degree of decentralized control and individual choice; therefore, advocating demand-side subsidies as a preferred alternative.

HOUSING POLICY COMPARATIVE ANALYSIS

Global

Housing provision is a major component of most social welfare programs across the globe. Housing is recognized as a basic right that all citizens are entitled to; however, housing can also be seen as form of social stratification, a means of segregating, separating and maintaining social

ordering. Different countries have used different institutional forms and policy choices to produce and provide housing services: public (government) vs. private (market) sector provisions.

Some believe that the only way to provide housing for the world's population is through liberal-private market solutions, and policies that enable protections of property rights, develops and regulates housing finance institutions, administers subsidies efficiently, provides infrastructure, and regulates land and housing development. Shlomo Angel, in his book, *Housing Policy Matters: A Global Analysis*, analyzed the housing sector in 53 countries, and measured housing quality, quantity and price. Angel concluded that those ***housing markets that are well regulated but free to within these regulations, provide better, more and lower priced housing.*** (McClure, 2002).

Variables found to have a positive association with housing performance, after controlling for income, are: a freely operating market for housing, the land is supported by a system of property rights and title registration, land and improvements can be used as collateral to borrow money for purchase of land and construction, lenders are free to adjust interest rates and loan terms to reflect risk and market conditions, properties can be sold or rented without price controls (McClure, 2002).

European

The destruction of two wars and the rise and fall of fascist and communist regimes has led Europe through periods of economic and social volatility. However, over the past 59 years Europe has experience relative stability, proving an environment for political and social policy innovation and experimentation. ***To address mass destruction and immigration, European countries looked to mass scale and heavily subsidized social housing production to alleviate chronic shortages of housing of all types,*** particularly through the development of social-rental housing and later through the development and encouragement of owner occupied housing (Blachin, 1996).

By the 1960s, housing shortages were being alleviated; but by 1970s, oil shocks and stagflation gripped Europe, moving economic management toward restrictive (neoclassical) monetarist tools to control inflation, conservative fiscal policies and privatization, right-of-center liberal governments, and a continued bias toward owner-occupied housing subsidies. It was only the social welfare states of the Netherlands and Sweden that maintained their focus on social housing allocations (Blachin, 1996).

Housing in northern and western Europe are characterized by active housing policies, reflected in 1%-to-4% of GDP going to housing expenditures, high average quality of housing stock, and the poorest neighborhoods are neither intolerable or socially divisive. The over-riding policy objective is that affordable housing should be available to all; however, the reality is that European governments fail to achieve this objective. This is due to public spending constraints, socio-demographic-economic shocks, mass immigration-social exclusion, land constraints, etc. (European Parliament, 1996).

European Union (EU) members are responsible for their own housing policies. Many countries have realized that planned housing investment and social rental management can contribute to active citizenship, community participation and social-economic cohesion; and that fragmented housing policies and market instabilities inhibit cross-national labor mobility, promote social segregation (ethnic, age and income), and erode regional and neighborhood comparative advantages. In many countries, *housing has become increasingly integrating with social security systems, environmental protection, and grass roots mobilization* (European Parliament, 1996).

European housing is relatively expensive, absorbing 15%-to-20% of average European incomes, and without subsidies, would be 30%-to-40% of average income for the lowest income households. Most European housing policies focus on three broad areas (European Parliament, 1996):

- **Accessibility**: access to adequate housing, management and maintenance services for low-income households.
- **Affordability**: restricting the burden of housing payments for low-income households.
- **Quality**: raising quality standards of new construction, promoting maintenance and rehabilitation to ensure adequate housing for the poor.

Most social welfare states in Europe realize and understand how housing design and management interact with health care and social service provision; and how large-scale, multi-sector, integrated policies can revitalize whole neighborhoods and cities (European Parliament, 1996).

By the end of the 1800s, Western Europe has introduced housing policies focused on demolition and slum clearance, and building quality standard, programs; however, these programs did little to improve access and affordability. Rent controls became the standard policy option from 1916 through the 1960s; however, controls were slowly removed as it became evident that these policies were producing inferior accessibility and quality outcomes. The suspension of rental market mechanisms led to the displacement of market provision by the non-market (social) housing sector (European Parliament, 1996).

Social housing by not-for-profit providers started in Sweden, Denmark, Austria, Germany, France, Netherlands and Britain in the early 1900s; and became the dominant form of housing provision in Denmark, Germany and France. In the UK and Netherlands, municipalities had key roles in housing provision. This sector grew rapidly, except in Mediterranean regimes, along with welfare state provisions from 1950 – 1980. Key policy mechanisms used were dwelling construction subsidies (30%-to-50% of cost), rent controls, standardized building codes, and access for low-income households. This was not the case in Mediterranean regimes, such as Greece, where state support through loans and tax-breaks were the sole provisions for low-income households (European Parliament, 1996).

Corporatist regimes, such as Germany, when developing social housing, were more tenure-neutral, but supported low-income home-ownership since the 1950s through housing rehabilitation and area regeneration. Market provision of subsidized housing has become a policy priority in Europe over the past ten years by providing capital subsidies to enhance supply and restrict rents, and by subsidizing income relative to housing payments. Since the 1970s, European housing policies have shifted from building supports to household supports (European Parliament, 1996).

Housing Stratification

This *liberal-market-capitalist* approach to housing policy is limited in that it does not take into consideration market failures or discuss the importance and significance of social housing, and housing production for the poor. Different groupings of people living in different parts of the housing stock are called *housing classes*. Housing classes can also be seen as groupings of people abiding by three different systems of housing allocation: 1) ability to pay, 2) need, and 3) informal rules (Matznetter, 2001).

It is particularly clear what influence the housing system has on the degree of segregation, *the larger the public housing stock, the lesser the degree of segregation*. The larger social housing sector in Europe facilitates dispersion and leads to lower segregation. Institutional racism is an important factor in explaining the high level of segregation in U.S. cities (Musterd, 1998).

Welfare state regimes push cities toward weak segregation and weak inequality, while globalization and liberal economic restructuring push cities toward strong inequality and segregation. Dismantling of the welfare state in the U.K. resulted in increased socio-economic segregation. Different policies have resulted in different special segregation in Europe, in France, the City of Paris is a good example where the central city is a wealthy core, and the suburbs segregate the poor and lead to social exclusion of immigrants and unemployed youth (Musterd, 1998).

Size and location of affordable housing stock is important in explaining locational deprivation. There is a direct relationship between economic restructuring and the changing nature of welfare states, and social-spatial segregation and social exclusion. This leads to a counterculture where jobs and education are no longer the prevailing system of values. Functionalists would argue that segregation creates community formation and supporting institutions (Musterd, 1998).

Over the last 50 years, Europe has experience similar histories and patterns of social, political and economic events. Left of center governments tended to adopt social-democratic welfare policies, and right of center government tended to adopt liberal welfare policies. Housing policy development in Europe since WWII has gone through four distinct phases (Balchin, 1996):

- **Phase I (Post WWII):** Left-and-right of center governments united over eradication of large-scale housing shortages.
- **Phase II (1970 – 1982):** Left of center (social democratic) governments in Western Europe employed object subsidies to promote large-scale housing in the social sectors: Sweden

(through 1976), Denmark (through 1982), W. Germany (1970–1982), Belgium (1970–1974, 1977–1980), Netherlands (1973-1977), United Kingdom (1974-1979).

- **Phase III (1976 – 1986):** Right of center governments cut social expenditures, social-rental construction superseded, existing social housing stock privatized, rent controls lifted, subject benefits increased for middle- and upper-middle classes: Sweden (from 1976), Netherlands (from 1977), United Kingdom (from 1979), Belgium (from 1981), Denmark (from 1982), Germany (from 1982); and left of center governments: France (1981 – 1986).
- **Phase IV:** Continuation of right of center governments, except for Sweden.

Housing policy development in Europe has been overlapping across time, country and political party; however, housing policy goals-objectives and political party consensus have been consistent in only a few countries (Sweden and the Netherlands) (Balchin, 1996).

Social Democratic Regimes

Netherlands

Like other countries after WWII, the Netherlands experienced rapid population growth. Housing policy responded by providing incentives to produce the maximum number of dwelling units through rationalized construction, economical design, and equipment. This was done at the local level by keeping land costs low through land-use controls (rationing) requiring certain construction densities and cost-covering land prices. Mass migration to central cities was mitigated by restricting mobility through the use of local residence permits (Donner, 2000).

Rental housing was subsidized by public loans and capital market loan interest subsidies. Housing production responsibility was given to limited-profit housing associations and larger local authorities. By the early 1990s, subsidized housing represented over 40% of all housing stock. Private and public sector rental rates were determined on a utility-value system, adjusted on an annual basis (Donner, 2000).

Pressures associated with rapidly escalating housing operating supports pushed the Dutch to restructure its housing policies in the 1990s, making limited-profit housing associations independent, utilizing capital markets as the primary source of mortgage finance, aligning rents with costs, privatizing significant portions of the public housing stock, and maintaining 100% deductibility of mortgage interest. The housing benefit system in Denmark is universal; it is available to all tenants, and accounts for over half of all direct housing policy expenditures (Donner, 2000).

In Netherlands household choice is real and there is more balance between tenures, with tenure-neutral policies resulting in an adequate supply of both social and private rental housing in comparatively effective competition with owner-occupation (Blachin, 1996).

Denmark

Under the broader definition of social welfare policy, Denmark gave policy preferences to limited-profit housing organization controlled by local authorities. Comprehensive social infrastructure was complemented with large-partially pre-fabricated housing estates of high construction quality. Due to negative experiences, the movement was toward high-density low-rise estates (Donner, 2000).

In Denmark, limited-profit housing is available to all strata of society, and has well-developed tenant participation in operating the tenements. Rent in high-standard limited-profit housing is high, satisfying demand and incurring prolonged vacancy rates. Private sector housing is older and of lower quality. The private housing stock is subject to rent controls, and there is a two-tier housing benefit system limited to tenants (Donner, 2000).

The preference toward owner-occupied housing in Denmark is reflected in the use of mortgage supports through marginal income tax allowances (deductions); however, this incentive has been reduced through the introduction of a flat rate. Denmark uses special long-term mortgages financed through long-term fixed interest bonds. Denmark has also implemented high land taxes to mitigate land speculation (Donner, 2000).

Sweden

Housing policy has played a significant role in the general framework of Sweden's welfare policies. The policy goal has been to "provide every household with a modern, comfortably equipped, dwelling." Housing production was amplified through the "Million Programme" of the 1960s, consisting of mass demolition, and large repetitive housing estate construction through municipal housing companies (Donner, 2000). In Sweden, household choice is real and there is more balance between tenures, with tenure-neutral policies resulting in an adequate supply of both social and private rental housing in comparatively effective competition with owner-occupation (Blachin, 1996).

Municipal housing is universal and open to everyone, it is not considered social housing. Municipal land policy instruments have not been employed widely, giving landowners significant ability to be flexible and free to react to the market. Rental rates determined by corporate negotiated, and help to set private sector market rents. Tenants have far-reaching participation rights. Mass migration to urban centers has caused vacancy rates in high-cost municipal housing local in suburban centers to rise rapidly and stay high (Donner, 2000).

Co-op housing has become more progressive and market oriented, and is a substitute for owner-occupied condominium flats, condos are not permitted. Subsidization of new housing units follows the principal of *tenure neutrality*, and is implemented through subsidized loans and capital market loan interest subsidies. In the 1990s, these subsidies were reduced and eliminated for owner-occupied housing; however, homeowners continue to receive a 30% flat rate deduction off their mortgage interest expenses, and imputed rents have been eliminated. Under a means test, if income does not meet rental payments, residents are entitled to housing subsidies regardless of tenure (Donner, 2000).

Liberal Regimes

United States

In the 19th century, industrialization, improved transportation, and large-scale immigration led to the rapid expansion of urban areas. Between 1840 and 1850 alone, the urban population of the United States almost doubled. In major industrial cities much of this growth was accommodated in tenement flats and other multistory structures (Fish, 1979).

Despite widespread public recognition of worsening urban housing problems and frequent calls for reform, only after the Civil War were government efforts undertaken to improve housing conditions. *In 1867 the New York state legislature enacted the first tenement-housing legislation, which regulated the construction of railroad flats by establishing minimum construction standards.* The continued influx of immigrants, however, resulted in the proliferation of overcrowded tenements and deplorable health conditions.

Attempts to improve housing were spurred by the writings of such reformers as Jacob Riis and Lawrence Veiller in the 1890s, as well as by the first federal report on housing conditions, issued in 1894. Nevertheless, it was not until 1901 that a law permitting enforcement of housing standards was enacted. The landmark New York City "New Law" required building permits and inspections, prescribed penalties for noncompliance, and created a permanent city housing department. Subsequently, the New Law was copied in other U.S. cities and provided an impetus for housing legislation at the state level in the early 1900s.

During the depression home building was at a standstill and the rate of foreclosures was intolerably high, emergency programs were enacted by Hoover and Roosevelt administrations to provide jobs in the construction industry, improve housing conditions, and extend financial assistance to people threatened with the loss of their homes.

The first major step toward a national housing policy was the creation in 1932 of the Federal Home Loan Bank System. This system of 12 regional banks, supervised by the Federal Home Loan Bank Board, provided short-term credit to member savings and loan associations. In 1934, the Federal Savings and Loan Insurance Corporation began offering depositors in both federal- and state-chartered associations insurance against the loss of their savings.

In 1934, the Federal Housing Administration (FHA) was created as a U.S. government agency whose function was to insure mortgages, providing banks and other lending institutions with a guarantee that their housing loans would be adequately secured, and the housing industry with a new stimulus during a time when almost no new homes were being built. Because FHA-insured mortgages, and the houses they buy, must conform to certain standards, the agency has had a great influence on the housing and mortgage-lending industries.

By 1937, the federal role in housing was further broadened under the Housing Act of 1937, establishing the U.S. Housing Authority (renamed the Federal Public Housing Administration in 1942 and the Public Housing Administration in 1947) as a permanent agency charged with

building and subsidizing local low-income housing projects. This created the basic structure for the nation's system of public housing. More than 1.5 million dwelling units have been erected under this act (Fish, 1979).

The era of the 1930s was one of collapse and depression (1930 – 1933) and rescue and recovery (1933 – 1939). The construction industry was paralyzed, there were housing bond scandals, the disappearance of credit and rampant foreclosures. The New Deal and Congress focused on creating jobs and housing and to rescue middle-class homeowners and lenders through the FHA. At this time housing professionals and the real estate lobby emerged to fight over public housing and the Housing Act of 1937 (Nathaniel, 1973).

By World War II the federal role in promoting housing construction and stable housing markets had been established, and a burgeoning commitment to low-income housing was evolving.

During World War II, private housing production had virtually stopped, as U.S. raw materials were diverted to the war. At the end of the war, extreme pent-up demand from over 15 years of marginal construction, and the needs from returning military personnel, created a severe of housing (Jacobs, 1986). From 1940 to 1945, population immigration and growth was impacting the Administration, Congress and localities. During this time there emerged local power centers through city halls, housing authorities and labor unions (Keith, 1973).

In 1948, the Federal National Mortgage Association (FNMA, or "Fannie Mae") was created and became a private organization in 1968. This institution provides a secondary market (liquidity) for FHA and Veterans Administration (VA) home mortgages by standing ready to purchase such loans from financial institutions.

The federal government responded to post-WWII urban concerns with the passage of the Housing Act of 1949. This act created the Urban Redevelopment Agency and gave it the authority to subsidize three fourths of the cost of local slum clearance and urban renewal. Under the act, "primarily residential" and "blighted" urban areas could be condemned, cleared of buildings, and sold for private redevelopment. This legislation established the goal of providing decent homes for all U.S. households (Fish, 1979). This act resulted in relocation problems giving rise to much criticism of urban renewal, particularly where luxury housing or office buildings were built on the cleared land.

The mortgage insurance programs of the FHA and the guaranteed home loans provided by the Veteran's Administration helped reduce the shortage, and by 1950 new construction exceeded the levels of home building achieved in the 1920s, the majority of these new dwelling units being single-family in the suburbs. This suburban development was heavily influenced by FHA's subdivision guidelines.

The 1940s started out being distracted by demobilization, the veterans' housing crisis and a premature attempt to industrialize the housing industry. The public at this time expressed revulsion against war-time controls and the political spectrum swung to the Republicans in 1946 (Keith, 1973). This crystallized the right-wing opposition to housing programs and the emergence of new Democratic leadership in Congress. During this time there was a rural-urban

split in Congress and established the role of mayors, labor and Northern Negroes in the housing policy debate.

The struggle over the Housing Act of 1949 was largely due to the political impact of Harry Truman's upset victory in 1948 and the strength of the real estate lobby. There was demagoguery by opponents of housing legislation on racial segregation issues. The proponents from public interest lobbies and the president struck against the real estate lobby for final victory.

The 1950s were when the first steps to meet the housing crisis in the cities really took hold. This was a time of establishing urban coalitions for housing, while the real estate lobby was exploiting neighborhood racial biases to block public housing locally.

The Housing Act of 1954 modified urban redevelopment and renewal activities by requiring communities to adopt code enforcement, relocation, and other measures that would prevent the further spread of urban blight. It also established new FHA mortgage insurance programs to help relocate slum residents and to encourage new urban construction (Fish, 1979).

During the 1960s, postwar federal involvement in housing had grown so large and complex that it became necessary to create a new federal body to administer the various housing programs. The time period from 1953 to 1957 was one of gradualism and stalemate. President Eisenhower was trying to seek a republican-business consensus on housing. This was a time of triumphs for the real estate lobby and is reflected in the moderate proposals put forward in the Housing Act of 1954 and the growing participation of private enterprise in housing (Keith, 1973).

From 1957 to 1961, Eisenhower moved to the right and the monetary climate was one of restraint and tight money, causing a recession in the home-building industry. The Democrats were swept into power in 1958, thus having great implications for housing, although Eisenhower vetoes housing legislation. From 1961 to 1963, there seemed to be more promise and direction. The Housing Act of 1961 was the first major appeal to the cities and the lower middle class regarding housing issues.

The Housing Act of 1964 liberalized FHA procedures to speed the processing of FHA-insured mortgages, setting up a low-interest housing-rehabilitation loan program, and provision land for public or nonprofit housing (Fish, 1979). The Housing Act of 1965 established the Cabinet-level Department of Housing and Urban Development (HUD), formed from the Housing and Home Finance Agency (HHFA) and incorporated the Federal Housing Administration, the Federal National Mortgage Association, the Public Housing Administration, the Urban Renewal Administration, and the Community Facilities Administration (Mitchell, 1985).

The Demonstration Cities and Metropolitan Development Act of 1966 created The Model Cities Program which sought to solve housing, education, employment, welfare, and health problems of slum dwellers. The program sought to coordinate health, education, welfare, housing, and employment programs for revitalizing urban communities.

From 1963 to 1966, Great Society programs were shadowed by the Vietnam War and transition from J.F. Kennedy to Lyndon Johnson. The Great Society programs were aggressive programs

confronting civil rights, the suburbs and their impact on housing. There were greater promises to the poor, cities, housing and community development. These programs were eventually faced with the financial dilemma of the Vietnam War (Keith, 1973).

A principal objective of the Housing and Urban Development Act of 1968 was to encourage the creation of "New Communities." But developers did not have sufficient financial resources for projects of such size. Under the act, the federal government undertook to guarantee bonds marketed to raise funds for these new communities (Fish, 1979). In return, the developers were to agree to certain economic and planning standards, providing housing for nearly all income groups and family sizes. This act set up new programs allowing FHA to insure mortgages for houses and apartment buildings on which interest was paid by the occupant or developer, as low as 1 percent, and a Rent Supplement program

The FNMA and the Government National Mortgage Association ("Ginnie Mae"), created in 1968 as a counterpart to "Fannie Mae," assist the housing industry by purchasing FHA-VA mortgages whenever lenders need funds. This encourages lenders to make mortgage loans and provides them with a means to expand their lending power (Jacobs, 1986).

In the 1960s, housing needs of the elderly and those with moderate incomes were added as target groups for housing subsidies. Attempts to improve housing for racial minorities culminated with the passage of the 1968 Civil Rights Act and subsequent Supreme Court decisions. These actions have substantially reduced, but by no means eliminated, racial discrimination in housing markets.

The 1966 to 1968 period was one of urban crisis. The war forced the home-building industry into recession. Congress took the initiative to build 26 million homes in 10 years under the 1968 Act. The Housing and Urban Development Act of 1970 authorized greater outlays for housing subsidy programs and additional funds for rent supplements to moderate-income households; and created a Community Development Corporations to encourage "new towns." The Emergency Home Finance Act of 1970 authorized the Home Loan Bank System to reduce interest rates on home mortgages by means of a federal subsidy, establishing mechanisms for a secondary market in conventional mortgages through the creation of Federal Home Loan Mortgage Corporation (FHLMC).

The Housing and Community Development Act of 1974 sharply reduced new construction subsidies and shifted the emphasis for low-income housing to the use of (Section 8) leased-housing allowances and vouchers on rental units, and block grants to states for housing. Although there have been several shifts in policy since 1974--most recently a severe curtailment of federal programs to meet housing goals set out in the 1974 act--the broad outlines of the legislation remain intact. The 1970s reflected an era of uncertainty under the Nixon Administration and the eventual dissatisfaction of U.S. housing policy among mayors, labor leaders and liberal organizations (Keith, 1973).

By the 1980s, federal spending on housing was dramatically reduced under President Reagan; the budget for public housing and subsidized rentals dropped from \$28 billion in 1980 to \$9 billion in 1989, despite an increase in poverty. During the same period the Department of

Housing and Urban Development (HUD) was wracked by political favoritism, fraud, and misuse of funds. Trends reversed starting in 1989 under HUD secretary Jack Kemp, leading to 1990 legislation funding construction, rehabilitation, and tenant ownership of public housing (Bratt-Rachel, 1993).

Starting in the 1980s, because of decreased federal funds, many United States cities were forced to increase their roles in providing housing. Among the provisions of the National Affordable Housing Act of 1990 are funds to help tenants of public housing buy their own units, increasing their pride of ownership as well as their economic prospects. Funded Homeownership and Opportunity for People Everywhere (HOPE) programs were created to help poor residents buy their public housing units. This act also allows the federal government to authorize block grants to state and local governments for construction and rehabilitation of public housing.

Canada

Over the past 50 years, Canadian housing policy has experimented with various housing policy initiatives: limited dividend, public housing, home ownership, co-ops, municipal and voluntary non-profits, pilot programs, home conversion and improvement loans, rent control, savings plans, rent supplements, aid, neighborhood improvement programs and land banks, etc. (Wolfe, 1998).

There is not a single housing policy in Canada; it is a fragmented collection of policies and institutions. Housing policy in Canada has shifted dramatically over the past twelve years due to fiscal constraints, moving away from social democratic housing provisions toward market oriented neo-liberal solutions. The focus is on providing affordable housing through policies directed to lower construction costs, speed up approval processes, legalize secondary apartments, increasing housing density, first-time home buyer incentives, insuring mortgage and securities, etc. (Wolfe, 1998).

Canada has 10 provinces, two territories and a population over 30 million. Eighty-three percent live in urban areas; 33% of the population lives in Toronto, Montreal and Vancouver; and the housing stock consists of over 10 million units, 7% social housing, 62% owner-occupied, and 30% private market rental. Over 80% of the housing stock has been build since 1945, 57% single-family housing, 9% is large apartments. There are roughly 661,000 units in 48,000 projects of social housing in Canada. New construction is targeted toward seniors and special needs groups (Wolfe, 1998).

Housing policy in Canada is administered by the Canada Mortgage and Housing Corporation (CMHC), with \$14 billion of assets; crated in 1945 as a Crown Corporation. Under the National Housing Act (HHA), the CMHC has powers in housing finance, social housing, housing research and development, and advisory to government. Since the 1960s, the government has distributed authority and responsibility from the national level to regional-municipal governments (Provision Housing Corporations) and agencies, becoming major players in social, renovation and renewal of housing (Wolfe, 1998).

In the 1970s, there were over 1,000 public housing agencies in Canada, there is currently 42 Community Resources Organizations (CRO) working to develop social housing.

United Kingdom

The first thirty years after WWII, Britain embarked on large-scale slum clearance to build housing to meet decades of pent-up demand. Slum residents were relocated to satellite towns. The responsibility for large-scale housing construction was initially given to local authorities, resulting in large stocks of council housing, roughly 33% of all housing in the 1980s. Mismanagement and operating deficits led the Thatcher administration to restrict local government controls over housing production and management, and gave a significant share of authority to limited-profit (non-market) housing associations. Generous discounts were given to sitting tenants to purchase over 2.0 million council dwellings (Donner, 2000).

Private sector rent controls were replaced by “fair rents,” resulting in landlords offering tenements on a furnished, short-term, and vacation oriented basis; incurring high turnover in the units; and changing of demographics to a younger mobile tenant base. Housing benefits are provided to both public and private housing sectors; however, a *poverty trap* is created due to income and asset based means tests (Donner, 2000).

In the United Kingdom, household choice is very limited by subsidy and tax policies, discriminating in favor of owner-occupation at the expense of the social-rental sector (Blachin, 1996). Owner-occupancy receives a housing policy bias through 100% deductibility of mortgage interest against individual marginal income tax liabilities; however, mortgage interest deductibility was reduced in the 1990s and completely phased out by 2000. The lack of liberal housing supports has led to falling volumes of housing completions in the 1990s, increasing functional and physical obsolescence of the housing stock (Donner, 2000).

Conservative-Corporatist Regimes

Germany

During the 1920s, the revolution in housing was a logical and inevitable result of a revolution in social politics. Berlin was the hotbed of reform activity socially and architecturally. A severe housing crisis emerged after WWI. This led to housing policies focused on revising building codes, and building corporations, design of minimal standards to achieve hygienic conditions, the discovery of means to reduce costs and eliminate speculation, and apply the necessary mechanisms to carry out publicly supported worker housing. These were important factors deserving careful consideration that eventually led to a revolution in German housing (Wiedenhoeft, 1985).

Housing in the 1920s emphasized the combination of a decent low-cost quality dwelling in a healthy, natural environment with the advantages of city living: education, transportation and work. However, mass immigration into the cities continued to create a crisis in housing. The state responded to this market failure by establishing public service building corporations

(GEHAG) to construct housing for low-income residents. This was a system of government support and supervision for large-scale, non-profit public housing programs. Worker housing was a public enterprise, transforming the industry from speculation to long-term investment (Wiedenhoeft, 1985).

During the 1930s, housing policy change radically away from those of the Social Democrats, de-emphasizing the construction of modern housing developments in modern cities in favor of emphasizing “inner colonization.” The settling of underdeveloped rural areas was an old answer to a housing shortage (Wiedenhoeft, 1985).

During the WWII, the bombing attacks on Berlin destroyed a significant portion of the housing stock, 35% of all housing had been totally destroyed and 35% seriously damaged. After the war, there were major efforts to clear the rubble and house the homeless and a steady stream of refugees. Housing development in Berlin was delayed until after the 1948-1949 airlift and blockade, most housing in the suburbs had been spared and rebuilt after the war (Wiedenhoeft, 1985).

German housing policy is predicated on co-operation at the legislative level between the German state, the *Lander* (local) and federalist implementation. Post-war housing subsidies concentrated on rental housing, later expanded to owner-occupied housing, and now to more flexible arrangement. Rental subsidies were available for limited-profit (abolished in 1990 repeal of Limited-profit Housing Act) and private sector developers. Tenants in subsidized housing with incomes exceeding income levels had to pay supplementary rent. However, regionally differentiated housing benefits are indispensable elements of housing policy (Donner, 2000).

In the owner-occupied sector, tax allowances were based on degressive depreciation, balanced by imputed rent, but abolished, when housing reclassified as a commodity. Regressive tax benefits were replaced by non-income related subsidies. The integration of East Germany produced problems due to conflicts in legal systems, severe deficits in the housing stock, and historical claims on property and validity of property rights (Donner, 2000). In Germany household choice is real and there is more balance between tenures, with tenure-neutral policies resulting in an adequate supply of both social and private rental housing in comparatively effective competition with owner-occupation (Blachin, 1996).

France

From 1850 to 1902, France's housing policy, particularly in the Paris city-state, focused on achieving public health and order; this was due to rapid population growth, mass immigration, over crowding, and unsanitary urban conditions. Public housing policy was influenced by the intellectual legacy of the Enlightenment, revolutionary, reformist and public health movements, realizing the connection between the mind, body and physical environment. However, the government tried to resolve the problems of urbanization by diverting the flow of population through administrative decentralization and the development of suburban and rural settlements (Shapiro, 1985).

The Melun Law of 1850 was the first public health measure focused on improving the interior conditions of private dwellings. The main provisions of the legislation were to establish a commission (Paris Health Council/Paris Commission on Unhealthful Dwellings) to inspect the conditions of building and make recommendation for remediation; this enlarged the scope public responsibility for housing conditions and health policy. From 1860 to 1870, rapid industrialization and population growth, annexation of the Paris suburbs, influx of migrant workers, slum clearance and demolitions programs, political unrest, and a significant downturn in new housing construction for the poor pushed the scope of the poverty problem beyond the abilities of the commission (Shapiro, 1985).

From 1878 through 1889, the supply of luxury housing increased faster than the rate of population growth, while working-class housing continued to see severe housing shortages. This led to deteriorating housing conditions, overcrowding, high mortality rates, and a collapse of the public sewer systems. By the 1890s the government identified the health of the population with that of national security; therefore, getting more involved in sanitary regulation by clearing out slum dwellings through condemnation (Shapiro, 1985).

Housing regulation from the 1940s to the 1960s, led to under investment in the housing stock, producing a private rental housing stock that is below quality standards, having high rates of functional and physical obsolescence, requiring demolition, and is populated by low-income households. In the 1950s, France's public housing construction system was well developed, building from 70,000 units in 1950 to 310,000 units by 1959, it had negative consequences on the private sector, a crowding out and lowering quality standards by HLM and grand ensembles housing projects. Policy focused the reduction in private housing expenditure, and the benefits flow mainly to the landlord (Donner, 2000).

Housing regulation from the 1960s to the 1970s, led to a liberalization of housing policy, a policy of disengagement, a slowing of new housing starts and a shift toward rehabilitation of existing dwellings through financial assistance to encourage investment by private property owners (1962 Malraux Law). France also embarked on policies oriented towards increasing home ownership at all income levels through privatization, establishment of home savings banks (1965) and establishing a secondary mortgage market (1967), the result was increased household and private sector participation rates in the housing sector (Langley, 2002).

The 1977 Housing Reform Act was critical in pushing forward liberal housing policy options by laying out financial assistance packages for the private sector, and recognizing the need for various housing types and needs. Key policy provisions were subsidies such as: Aid for Personal Logging (APL), rental assistance; Prime Amelioration Habitat (PAH), low-income homeownership grant for improvements; and Preferred Loan Aid (PLA), subsidized loans for new construction and rehabilitation of rental units.; and Pret Accession Property (PAP), subsidized loans for low-income households to purchase a new home (Langley, 2002).

In the 1980s, decentralization laws opened public sector participation and required land-use planning at the local municipal and departmental levels, placing housing into a larger urban context, and weaving it into broader social and health issues (Langley, 2002). In 1989 and 1990,

France enacted legislation that considered housing to be a national responsibility, priority and solidarity, guaranteeing every citizen the basic right to a home by setting up local Housing Solidarity Funds to provide support for those in need of housing and facing exclusion; and to reform social housing allocation by providing greater transparency, attention to meeting needs of the disadvantaged, and greater social mix of housing options administered through a single departmental registration system (Embassy of France and Zambia and Malawi, 2001).

Currently, the private housing sector, the government provides incentives to private landlords to rent to tenants with middle incomes. Tax-breaks are given to landlords that ask moderate rents for a minimum of 9 years. The “private landlord’s charter” is a trade-off between tax-breaks and rental restrictions. Tax levies are imposed on units left vacant for more than two years (Embassy of France and Zambia and Malawi, 2001).

Support for home ownership is given to modest-income households through special (zero interest) loans granted on the condition of income limits, and building cost limits, allowing the recipient to benefit from lower interest rates and housing grants to cover monthly payments. A home ownership savings system has been established to set up home ownership savings accounts and plans on a universal basis, providing tax relief on interest earned and state bonuses when withdrawn from home purchase (Embassy of France and Zambia and Malawi, 2001).

The social housing stock in France consists of over 4.7 million dwellings and grows at roughly 60,000 dwellings per year. More than 75% of the 300,000 total dwellings built in France every year benefit from State aid, particularly through a reduced VAT rate of 5.5%. The goal is to develop a stock of social housing. Instruments used are allowances to tenants (6.3 million households costing 79 billion francs), income limits for rental payments, rental ceilings imposed on landlords, specialist operators, and State-aided building loans (Embassy of France in Zambia and Malawi, 2001).

Today, 73% of French households are satisfied with their living conditions, 96% of all units have a private bath (Langley, 2002). In 2000, France spent up to 126 billion francs in housing finance expenditures, 14 billion francs for construction subsidies, 35 billion francs in aid to individuals, 62 billion francs in tax relief, 16 billion francs for other housing related expenditures, and spending by employers and unions to 66 billion francs (Embassy of France and Zambia and Malawi, 2001).

The current population of France is 61 million with a total housing stock of 29 million dwellings, 24 million dwellings are main residents, 3 million second homes and 2 million are vacant. Over the last ten years the housing stock has grown by 11%. Fifty-five percent of French people own their homes, compared to 51% in 1984; 58% of dwellings are detached; 3% of dwellings lack minimum modern conveniences, compared to 11% in 1984; and 65% of dwellings were built after 1948. In 1998, households spent 22% of disposable income on current expenses for their homes, 44% of gross savings were on property investment (Embassy of France and Zambia and Malawi, 2001).

Latin Conservative-Corporatist Regimes

Italy

People in Italy are housed differently compared to other countries in North America and Europe. Differences emanate from the unique and historical development of settlements across the Italian peninsula, and the political economy, administrative, and planning context of the state. The housing system in Italy is similar to those of other capitalist countries: lending institutions provide mortgage capital; developers provide land, labor and coordination; public authorities regulate and approve developments; consumers rent and buy homes with savings or mortgage capital (Angotti, 1977).

Most land and housing is private, and there are slums and luxury housing district close to each other, and blatant contradictions of segregation and imbalanced of urban growth and development. The rate of construction is determined and motivated by money markets, developer profits, and is biased toward upper class housing development. Public housing provided an insignificant share of housing needed to meet increasing demand by the working classes and those living in poverty (Angotti, 1977).

Housing is different and unique in Italy compared to other countries in that it provides a critical role for tenants and mass housing organizations, rent control, extensive unregulated and illegal private housing development, extremely fragmented structure of the building industry, leading role of housing sector investment in many cities, and sharp regional difference in housing characteristics (Angotti, 1977).

After WWII, mass migration from the mezzogiorno to northern cities of Italy exacerbated housing demand. Since the war, one fourth of the population of the south migrated from depressed areas. In the 1970s, there was an estimated shortage of 3-to-8 million units, and the need for new housing ranged from 260,000-to-850,000 units per year. Forty percent of the existing housing stock needed to be rehabilitated or replaced. The extent of poverty in Italy was incredible considering it was classified as an advanced industrialized country (Angotti, 1977).

This, along with a lack of official housing production due to the recession, tight monetary and fiscal policies, and excessive housing regulation and requirements, created large numbers of illegal self-help communities, and subsequent ecological disasters. These tenements were initially tolerated but were later targeted by authorities. To address the housing shortage and quality issues, the government embarked on an ambitious multi-year suburban construction program, distinguishing between fully subsidized rental housing, partially subsidized owner-occupied housing and flexible subsidization for private developers (Donner, 2000).

Public rental housing is produced and operated by limited-profit housing corporations, where rents are income means tested, restrict household mobility, do not cover operating costs. This is an insignificant sector and has limited impact on the housing sector, and the state has yet to develop a general housing benefit system (Donner, 2000).

Long-term market intervention has caused the private rental sector to lose importance; however, illegal arrangements have allowed owners and developers to circumvent restrictions to produce housing. The dominant policy instrument to motivate housing production and ownership is owner-occupied deductibility of mortgage interest rates and low property taxation.

Greece

Housing policy in Greece was driven by mass migration to city-states (Athens) after WWII, where 33% of the total population now lives. Greek settlements were developed based on small-scale land ownership with a lack of central urban planning. This, along with low incomes, leads to illegal tenements and self-help structures similar to other developing third world countries. The lack of centralized planning and local coordination and implementation has led to a housing stock dominated by owner-occupied dwellings, requiring large down payments (equity) and pooling of savings within the family unit. High internal migration, turnover, and structural vacancy rates, has led to high construction levels of transient occupied housing (Donner, 2000).

Over two million people migrated from Asia Minor to Greece in the early 1920s, the private housing sector responded, motivated by indirect government support, and encouraged urbanization. From 1950 to 1970, the cities of Athens and Thessaloniki doubled in size, settlers bought land and built-supervised construction of dwellings, ignored planning-building regulations, and were encouraged and annexed by municipal governments. Home ownership was motivated by insecurities in the capital markets, hedge against inflation, and ability to produce real rates of return over the long run (Sapounakis, 1998).

Housing policy in Greece has been characterized by its lack of comprehensive planning, scope and effectiveness. This is reflected particularly in the quality of the housing stock. Subsidized loans are available for specific employment classes, but these subsidies are highly rationed. The primary policy supports are 100% deductibility for mortgage interest, and exemptions on imputed rental income. However, to make up for an inefficient property tax system, owner-occupied transaction costs are fairly high (Donner, 2000).

The housing sector has become an important sector of the Greek economy. From 1991 to 2000, the housing stock grew by 11%, compared to 10% from 1981 to 1990. Sixty-one percent of all homes in Greece are located in urban areas, 78% of these homes are privately owned, only 18% are rented. Fourteen percent of Greek households, the highest in the EU, own a second home. Due to the lack of capital market development, Greeks look to home ownership as one of the only investment options (Apergis, 2001).

Due to the important role of private housing construction in the economics, its political significance, and its role in economic policy, it is used to boost incomes, employment and domestic demand. The construction sector receives tax advances, large public works projects, etc. (Curtis, 1994).

Over the past few years, the housing industry in Greece has change rapidly due to liberalization of financial markets, falling interest rates, rapid obsolescence of the existing housing stock, and changing consumer preferences toward housing services. The housing sector has been targeted

by government monetary and fiscal policies to promote an environment conducive to low mortgage interest rates, lower unemployment rates and balance economic development and growth (Apergis, 2001).

The housing shortage in Greece is estimated at over 500,000 units, 40,000 people per year illegally settle in the outskirts of the central city of Athens (Dicks, 1971). Enactment and enforcement of Greek housing policy has been incoherent historically, resulting in fragmented outcomes inconsistent with demographic trends. Greek housing policy is neo-liberal in its approach, enforcing functional stratification of the population by class: workers, low income employees, other means tested groups, and excludes specific categories of homeless people (Sapounakis, 1998).

Housing policy in Greece is plagued by two main obstacles (Sapounakis, 1998):

1. No coherent housing policy and not national policy on homelessness.
2. No link between emergency housing and permanent housing (continuum of care), and no public or non-profit sectors that can provide economies of scale in housing services.

Housing programs are administered by the Ministry of Health and Welfare, and output has been limited, particularly for those with the greatest need of support. Most homeless lack the criteria (citizenship) necessary to receive benefits from welfare organizations, entitlement criteria are inconsistent with current social, economic, health and housing needs (Sapounakis, 1998).

These needs are driven by underdevelopment, demographic trends, and mass foreign immigration (Albania, South-east Europe, and Middle East). There is no direct policy link between homelessness and unemployment; therefore, housing policy in Greece cannot address its housing problem adequately. Even if Greece could produce relatively affordable-quality housing, foreigners would rather save on housing and export earnings to family in home countries (Sapounakis, 1998).

Housing problems in Greece are addressed institutionally through the family unit, filling the lack of state produced welfare provision. The unemployed and without family homeless are not targeted, housing assistance (subsidized loans) is directly targeted toward low-income workers. Poverty in combination with unemployment has caused housing conditions to continue to deteriorate. There is no government coherent housing or foreign integration policy, although they have been initiated by new European Union (EU) initiatives, they are not considered mainstream social welfare policy (Sapounakis, 1998).

Most of the housing programs in Greece focus on: a) social support, b) amount of support, c) providers of funding, d) building standards and zoning, e) tenancy rights, f) degree of control, and g) degree of permanent-temporary housing. Housing is allocated by means test but also by lottery. (Sapounakis, 1998).

COMPARATIVE DATA ANALYSIS

Cross Country Comparative Analysis

Political, Economic, Demographic and Housing Statistics

Socio-political systems in various countries helps to determine the relationship between housing policy and housing production. Esping-Andersen (1990) categorized countries by distinct socio-political-economic welfare regimes: ***social-democratic, corporatist and liberal welfare states***. These regimes are the dominant political forces behind housing policies advocating universalism and decommodification of classes (Balchin, 1996).

Social-democratic regimes provide a one-nation system of welfare based on equality and quality for all (Sweden/Scandinavian countries); corporatist regimes promote free market capitalism and privatization to enforce rights for specific classes and occupations, replacing social provision with private provision of welfare benefits (Germany, Austria, Netherlands, France); and liberal regimes provide minimum means-tested benefits for low-income and working class stakeholders (United States, Canada, United Kingdom, Ireland). Barlow and Duncan (1994) identify a fourth regime of rudimentary welfare states, these countries are similar to liberal regimes with limited or non-existent welfare provisions, have an agricultural economic and rural poverty bias, and a history of authoritarian-militaristic governments (Greece, Portugal, Spain, Italy) (Balchin, 1996).

Kemeny (1995) breaks down the rental market by tenure and importance of rental housing, identifying ***unitary*** rental systems where private and public rental markets are integrated, and ***dualist*** rental systems where private and public rental market are segmented. The segmentation of tenure types are instrumental in understanding the provision of housing, subsidization, access, affordability, degree of tenure-neutrality, safety net for the poor, and preferences for home-ownership. In dualist systems, marginal rental revenue is pushed down to marginal rental costs by the state controlling supply in the rental market; and depending on the degree of cost-rental housing stock and production, influences the degree to which the private rental market can develop and obtain monopoly profits (Balchin, 1996).

SOCIAL WELFARE REGIMES AND RENTAL MARKETS, WESTERN EUROPE		
SOCIAL WELFARE REGIMES	RENTAL MARKETS	COUNTRIES
Social Democratic	Unitary Unitary Unitary Unitary	Sweden Denmark Norway Finland
Transitional	Unitary	Netherlands
Corporatist	Unitary Unitary Unitary	Germany Austria Switzerland
Transitional	Unitary	France

Liberal Welfare	Dualist	United States
	Dualist	Ireland
	Dualist	United Kingdom
Rudimentary Welfare	Dualist	Italy
	Dualist	Spain
	Dualist	Portugal
	Dualist	Greece

Source: Esping-Andersen, 1995.

Notes: (SD) Social Democratic; (C) Corporatist-Conservative; and (L) Liberal Regimes.

Unitary: social and private renting integrated into single market; Dualist: state controls and residualises social-rental sector to protect private rental market.

Esping-Andersen did not include housing in his analysis; however, the following tables have identified and matched housing metrics with countries by regime type. Doing this indicates social-democratic bias towards rental and co-op housing; corporatist bias towards both social and private rental sectors, looking to them as temporary solutions to housing problems with out disruptions in social stratification; and liberal bias towards owner-occupied housing and social stigmatism (Balchin, 1996).

POPULATION GROWTH, WESTERN EUROPE, 1945 - 1991		
COUNTRY	POPULATION 1991 (000's)	POPULATION % 1945
Netherlands (SD)	15,060	161.3
Spain (D)	38,872	145.5
Belgium (C)	10,022	144.5
France (C)	56,634	144.3
Germany (C)	79,984	143.9
Luxembourg (C)	384	135.7
Finland (SD)	5,029	130.0
Sweden (SD)	8,644	129.0
Denmark (SD)	5,129	126.8
Greece (D)	10,200	126.7
Italy (D)	57,746	122.6
Ireland (L)	3,526	119.4
Portugal (D)	10,400	118.4
United Kingdom (L)	57,800	116.4
Austria (C)	7,796	114.7

Source: CEC, Demographic Statistics.

Notes: (SD) Social Democratic; (C) Corporatist-Conservative; (L) Liberal Regimes, (D) Dualist Rudimentary Liberal/Corporatist.

HOUSING INVESTMENT, WESTERN EUROPE		
COUNTRY	% TOT. INVEST AV. 70'-89'	% TOT. INVEST 1992
France (C)	29	27
Sweden (SD)	NA	27
Germany (C)	28	26
Italy (D)	27	26
Greece (D)	27	23
Netherlands (SD)	27	23
Spain (D)	26	20
Denmark (SD)	26	20
Luxembourg (C)	NA	20
Belgium (C)	25	21
Ireland (L)	23	22
Austria (C)	NA	19
United Kingdom (L)	20	18
Portugal (D)	19	17

Source: U.N. Annual Bulletin of Housing and Building Statistics.
Notes: (SD) Social Democratic; (C) Corporatist-Conservative; (L) Liberal Regimes, (D) Dualist Rudimentary Liberal/Corporatist.

HOUSING INVESTMENT: AVERAGE PER ANNUM, 1970 - 1989		
RANK	COUNTRY	% GDP
1	Greece (D)	6.34
2	France (C)	6.20
3	Germany (C)	5.98
4	Spain (D)	5.82
5	Ireland (L)	5.67
6	Netherlands (SD)	5.52
7	Italy (D)	5.51
8	Denmark (SD)	5.22
9	Belgium (C)	4.52
10	Portugal (D)	4.22
11	United Kingdom (L)	3.59

Source: United Nations Annual Bulletin of Housing and Building Statistics.
Notes: (SD) Social Democratic; (C) Corporatist-Conservative; (L) Liberal Regimes, (D) Dualist Rudimentary Liberal/Corporatist.

HOUSING SURPLUSES AND DEFICITS, EU 1991			
COUNTRY	# DWELLINGS (000's)	# HHLDS (000's)	SURPLUS/DEFICIT
Spain (D)	17,173	12,040	5,133
France (C)	26,237	21,535	4,702
Italy (D)	23,232	20,646	2,586
Greece (D)	4,690	3,344	1,346
Portugal (D)	4,181	3,176	1,005
United Kingdom (L)	23,622	22,800	822
Germany (C)	7,017	6,652	365
Belgium (C)	3,805	3,610	295
Denmark (SD)	2,375	2,251	124
Ireland (L)	1,039	1,029	10
Luxembourg (C)	135	145	-10
Netherlands (SD)	5,965	6,135	-170

Source: Netherlands Ministry of Housing, Physical Planning and Environment, 1992.
Notes: (SD) Social Democratic; (C) Corporatist-Conservative; (L) Liberal Regimes, (D) Dualist Rudimentary Liberal/Corporatist.

The Netherlands, Sweden and the United Kingdom have large social not-for-profit sectors and policy costs exceed 3% of GDP. These countries have significantly changed their traditional social welfare roles and approaches to housing policy since the 1980s. Due to rent controls and slum clearance programs, the Netherlands and U.K. have small private rental markets, promoting home-ownership instead; and Sweden has pursued tenure neutral approaches (European Parliament, 1996).

Corporatist regimes such as Austria, France, and Germany – along with Denmark – have seen less market displacement, and private rental sector policies have allow for the private landlord sector to remain, facilitating and upgrading the sector, and allowing the private sector to met more of the low income housing needs (European Parliament, 1996).

Ireland, Italy, Belgium, Finland and Luxembourg have high shares of home-ownership and small social housing sectors, with policy costs at 1% of GDP. Belgium and Luxembourg have de-emphasized the pursuit of social housing provision; and Italy has a decentralized policy based on regional income differences. Mediterranean conservative states such as Portugal, Spain and Greece focus on home-ownership, support for owners, minimum social provision, and large-but-declining low-quality private rental sectors. Policy costs fall well below 1% of GDP (European Parliament, 1996).

TENURE AND SPENDING IN HOUSING				
Country	Owner Occupied	Social Rented	Private Rented	Housing Costs %GDP
Social Democratic Regime				
Denmark	50%	18%	24%	1%
Netherlands	47%	36%	17%	3%
Sweden	43%	22%	18%	4%
Average	47%	25%	20%	3%
Corporatist Regime				
Belgium	62%	6%	30%	0.24%
Germany	38%	26%	36%	1.4%
France	54%	17%	21%	2%
Austria	41%	23%	22%	NA
Average	49%	18%	27%	1.2%
Mediterranean/Latin Corporatist/Dualist Rudimentary Liberal Regime				
Greece	70%	0%	26%	NA
Spain	76%	2%	16%	1.0%
Italy	67%	6%	8%	NA
Portugal	66%	4%	28%	NA
Average	70%	3%	20%	1%
Liberal Regime				
United Kingdom	66%	24%	10%	3.3%
European Union	56%	18%	21%	NA
Source: Tenure, ECODHAS; European Parliament, 1996.				
HOUSING TENURE, WESTERN EUROPE, 1995				
Country	Owner Occupied	Private Rental	Social Rental	Total Rental
Private Rented Sector Above EU Average				
Switzerland (C)	31%	60%	3%	63%
Germany (C)	38%	36%	26%	62%
Luxembourg (C)	67%	31%	2%	33%
Belgium (C)	62%	30%	7%	37%
Social-Rented Sector Above or Broadly at EU Average				
Netherlands (SD)	47%	17%	36%	53%
Austria (C)	41%	22%	23%	45%
Sweden (SD)	43%	16%	22%	38%
Denmark (SD)	50%	24%	18%	42%
France (C)	54%	21%	17%	38%
Owner-Occupied Above EU Average				
Ireland (L)	80%	9%	11%	20%

Spain (D)	76%	16%	2%	18%
Finland (SD)	72%	11%	14%	25%
Greece (D)	70%	26%	0%	26%
Italy (D)	67%	8%	6%	14%
United Kingdom (L)	66%	10%	24%	34%
Portugal (D)	65%	28%	4%	32%
Norway (SD)	60%	18%	4%	22%
European Union	56%	21%	18%	39%

Source: CECODHAS (European Liaison Committee for Social Housing, 1995; Economist Publications, 1994, The World in 1995.

Notes: (SD) Social Democratic; (C) Corporatist-Conservative; (L) Liberal Regimes, (D) Dualist Rudimentary Liberal/Corporatist.

DWELLING COMPLETED PER 1,000 INHABITANTS IN SELECTED EUROPEAN COUNTRIES, 1972

RANK	COUNTRY	DWELLINGS
1	Sweden (SD)	12.8
2	France (C)	12.3
3	Netherlands (SD)	12.2
4	Switzerland (C)	11.6
5	Norway (SD)	11.1
6	Federal Republic of Germany (C)	10.7
7	Denmark (SD)	10.0
8	Spain (D)	9.6
9	Hungary (C)	8.5
10	Czechoslovakia (C)	8.3
11	Ireland (L)	6.8
12	Romania (C)	6.8
13	Austria (C)	6.5
14	Yugoslavia (C)	6.4
15	Poland (C)	6.1
16	United Kingdom (L)	5.9
17	Bulgaria (C)	5.4
18	Italy (D)	4.8
19	German Democratic Republic (C)	4.1

Source: United Nations, Department of Economic and Social Affairs, 1976.

Notes: (SD) Social Democratic; (C) Corporatist-Conservative; (L) Liberal Regimes, (D) Dualist Rudimentary Liberal/Corporatist.

DISCUSSION OF RESULTS

All EU countries have large private or social rented sectors, and most countries have moved from one regime type to another. Since the 1980s, the UK has moved toward a central-liberal form of social welfare regime; in the 1990s, by France; and the Netherlands from corporatist to social-democratic (Barlow and Duncan, 1994). This makes the application of Esping-Andersen's analysis to housing policy theoretically challenging, thus leading to a case-by-case approach to analysis (Balchin, 1996).

Housing policy in North American and Europe over the decades has aimed to draw a tight connection between public health, the material setting, and the physical, moral and social well-being of the population. A.A. Tardieu believed that "the material conditions of life exercise so direct and so evident an influence on the moral dispositions of man that a well-organized society must constantly extend its efforts to improve the physical condition of the largest numbers of its citizens." The endemic pathology of the urban environment and its relationship between disorder and disease is obvious (Shapiro, 1985).

Housing reform through out the decades has promised nothing less than to reduce social tensions, moralize the working classes, promote public health, and create a more acceptable alignment between social space and geographic space. It is believed that if governments can create an environment that promotes homeownership, then workers and dangerous classes would settle down and focus on family life, assimilate bourgeois values, restoring stability, and eliminate disruptions and conflicts inherent in urbanizing societies: inadequate services, overcrowding, polarities of wealth and poverty, health and disease. These would have to ultimately be negotiated in the context of mass political (plural) democracy (Shapiro, 1985).

Housing policies all promise to guarantee public order, health and social peace, but raise issues such as the role of government, degree of worker housing, balancing of public and private individual and property rights, claims on these rights, etc. (Shapiro, 1985).

In liberal regimes, the federal government has acted to make mortgage funds more readily available, and its direct role in housing finance has diminished markedly. In the past, federal policy actions have been of four different types:

- 1) those which provide the framework and support for housing finance markets;
- 2) those aimed at under housed segments of the population;
- 3) those which respond to crisis situations;
- 4) those that encourage housing production generally--such as the mortgage interest and real-estate tax deductions allowed to homeowners.

Furthermore, some federal legislation aimed at non-housing problems, such as programs to improve urban transportation and environmental quality have had substantial impact on the cost, location, and quality of residential structures.

Together with general economic growth, federal supply-side housing policies have been successful in nearly eradicating the worst housing problems of previous decades.

CONCLUSIONS AND POLICY RECOMMENDATIONS

Conclusions

Housing policy in North American and Europe over the decades has aimed to draw a tight connection between public health, the material setting, and the physical, moral and social well-being of the population. A.A. Tardieu believed that “the material conditions of life exercise so direct and so evident an influence on the moral dispositions of man that a well-organized society must constantly extend its efforts to improve the physical condition of the largest numbers of its citizens.” The endemic pathology of the urban environment and its relationship between disorder and disease is obvious (Shapiro, 1985).

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Together with general economic growth, federal supply-side housing policies have been successful in nearly eradicating the worst housing problems of previous decades.

In the future, private sector housing supply in liberal regimes will continue to outstrip housing demand; however, affordability will continue to be a problem. Housing supply will continue to

exceed housing demand due to a federal housing policy bias toward private sector supply-side legislation.

Factors showing strong correlation with housing supply over the years are:

- Single and multi-family housing starts
- CPI growth
- Consumer confidence
- Absolute change in GDP
- Change in home prices
- Change in housing inventory
- Interest Rates
- Affordability

Policy Recommendations

The downside to supply-side policies is environmental degradation and urban sprawl. To take environmental conditions into consideration, the federal government should look at including “smart growth” incentives. These incentives would channel housing development to existing infill or central city locations.

Other policy recommendations are to eliminate or reduce mortgage interest deductions, reduce subsidized mortgage finance operations and scale back on government warranties. Due to current policies in place, the housing market in some countries could create oversupply conditions in the future. Although, market oversupply is a risk to governments, mortgage institutions, developers and property owners, it is a benefit to consumers of housing services due to lower prices and higher levels of affordability.

- **Land**: general land tax, effective capital gains tax, general municipal pre-emptive purchase right.
- **Housing Construction**: acquisition of local authority housing stock.
- **Housing finance**: establishment of a Housing Financing Fund, refinancing by a pension fund.
- **Housing stock**: operational of local authority housing stock, reduction of market intervention in the private rental market.
- **Housing expenditure and income**: general but limited housing benefit.
- **Taxation**: abolishment of real property transfer tax.

My feeling is that federal housing policy in liberal regimes is supply-side biased, and produces supply bubbles, that eventually benefits the general public. Overall, North American and European housing policy is effective in increasing homeownership, housing supply, construction quality, and better living conditions.

ANTICIPATED USEFULNESS OF RESULTS

Academic Value of Research

The academic value from the research is to understand federal housing policy across various welfare state regimes, its outcome on overall supply and its outcome on overall social well-being of the population.

By looking at housing policy in a historical context provides academics the opportunity to see what programs and legislation were enacted at what periods of time, and under what political and economic conditions.

This research will provide academics the opportunity to analyze the history of housing policy in North America and Europe and rationalize what regimes and policies have been affective in solving the housing crisis, and what regimes and policies have made mistakes followed by there outcomes.

The academic value from the research is also to continue to test the significance of institutional arrangements and welfare state regimes on supply and demand variables identified in previous research, and to introduce new variables that may not have been available or thought of in prior research studies.

The real academic value from this research will be in the final institutional analysis and development of supply and demand forecast models. These models will be able to help guide other forecasters in building housing forecast models, and depending on the results of the analysis, help policy makers in identifying effective supply side or demand side policies that work to bring national housing markets into equilibrium with long run demand.

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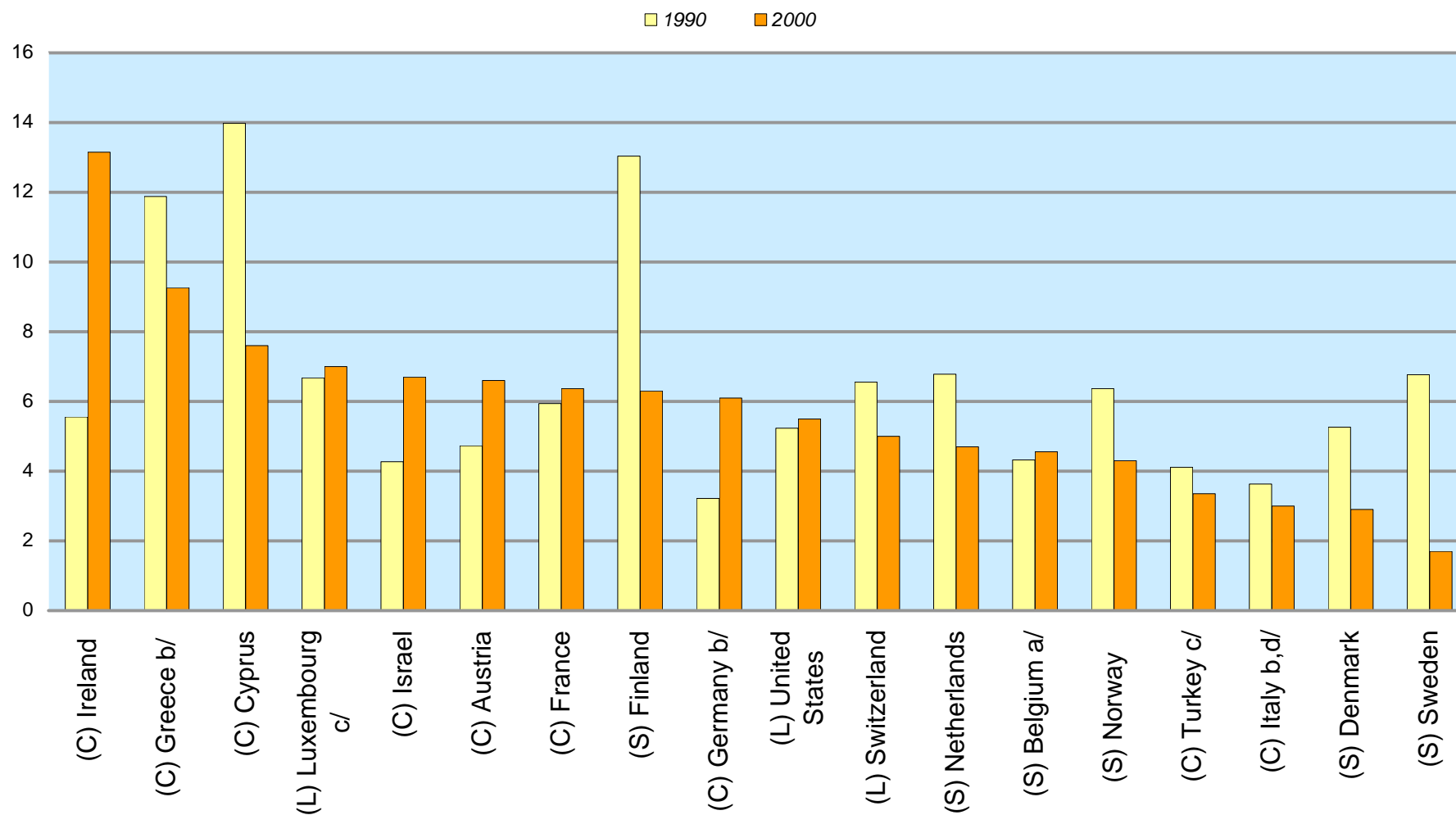
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Dwellings completed per 1000 population, 1990 and 2000

Western countries



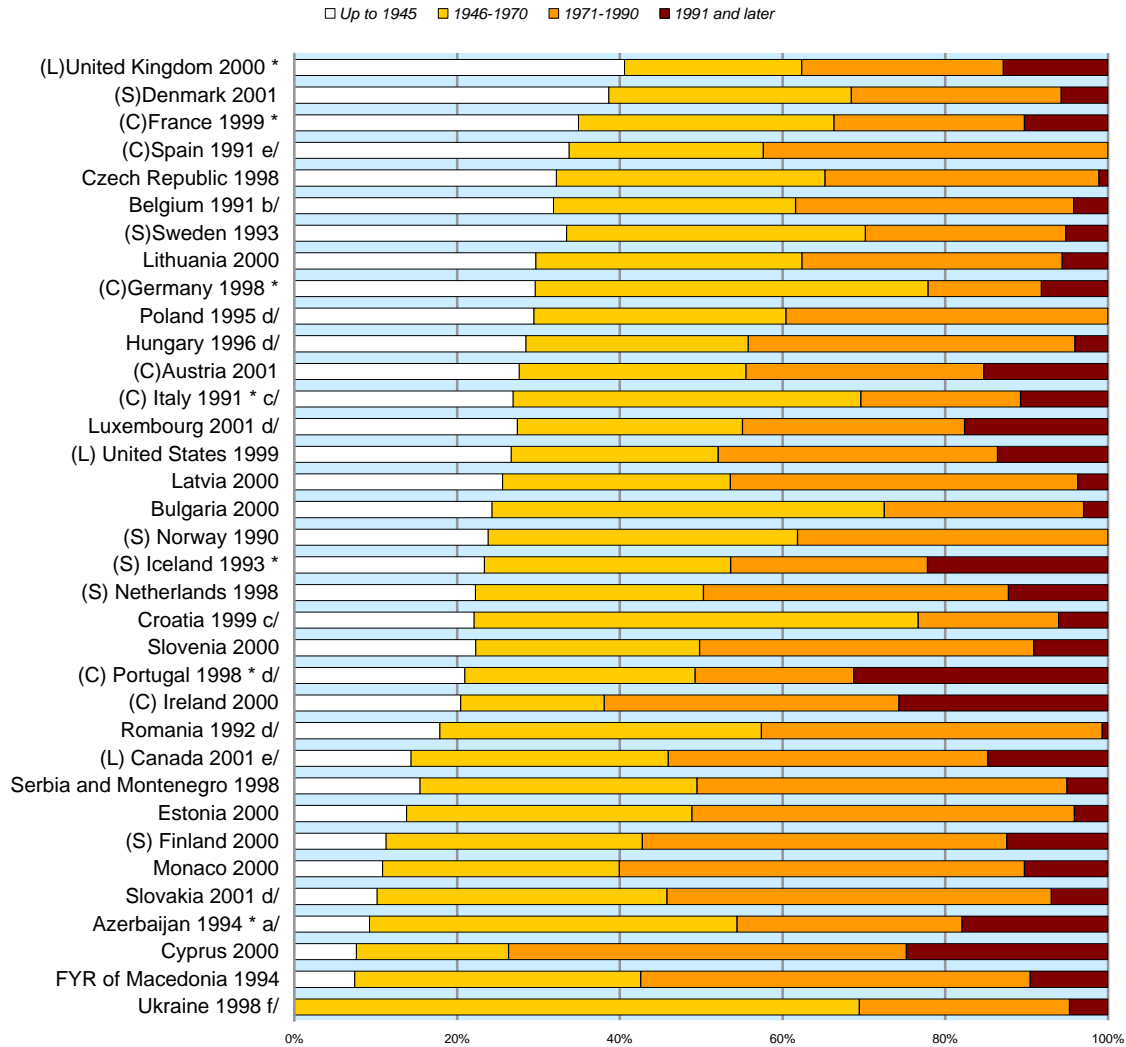
Source: UNECE Environment and Human Settlements Division, Housing database.

Dwellings completed per 1000 population in 1990 and 2000

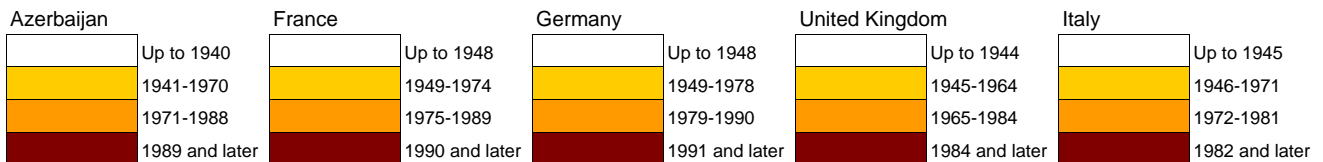
Sorted by 2000	1990	2000	Sorted by 1990	1990	2000
(C) Ireland	5.6	13.2	(C) Cyprus	14.0	7.6
(C) Greece b/	11.9	9.3	(S) Finland	13.0	6.3
(C) Cyprus	14.0	7.6	(C) Greece b/	11.9	9.3
(L) Luxembourg c/	6.7	7.0	(S) Netherlands	6.8	4.7
(C) Israel	4.3	6.7	(S) Sweden	6.8	1.7
(C) Austria	4.7	6.6	(L) Luxembourg c/	6.7	7.0
(C) France	5.9	6.4	(L) Switzerland	6.6	5.0
(S) Finland	13.0	6.3	(S) Norway	6.4	4.3
(C) Germany b/	3.2	6.1	(C) France	5.9	6.4
(L) United States	5.2	5.5	(C) Ireland	5.6	13.2
(L) Switzerland	6.6	5.0	(S) Denmark	5.3	2.9
(S) Netherlands	6.8	4.7	(L) United States	5.2	5.5
(S) Belgium a/	4.3	4.6	(C) Austria	4.7	6.6
(S) Norway	6.4	4.3	(S) Belgium a/	4.3	4.6
(C) Turkey c/	4.1	3.4	(C) Israel	4.3	6.7
(C) Italy b,d/	3.6	3.0	(C) Turkey c/	4.1	3.4
(S) Denmark	5.3	2.9	(C) Italy b,d/	3.6	3.0
(S) Sweden	6.8	1.7	(C) Germany b/	3.2	6.1

Source: UNECE Environment and Human Settlements Division, Housing database.

Dwellings by construction period, in selected countries



* Changes in construction periods:



a/ In million square meters.

b/ Data refer to dwellings started.

c/ Data refer to owner-occupied dwellings.

d/ Data refer to occupied dwellings only.

e/ Data refer to main residences only.

f/ Data refer to owner-occupied dwellings in private sector, and housing cooperatives.

Dwellings by construction period, in selected countries

	Year	Up to 1945	1946-1970	1971-1990	1991 and later	Unknown
Ukraine 1998 f/	1998	0.0	69.4	25.8	4.7	0.0
FYR of Macedonia 1994	1994	7.0	33.3	45.3	9.0	5.4
Cyprus 2000	2000	7.6	18.7	48.9	24.8	0.0
Azerbaijan 1994 * a/	1994	9.2	45.2	27.7	17.9	0.0
Slovakia 2001 d/	2001	10.0	35.1	46.5	6.8	1.5
Monaco 2000	2000	10.6	28.6	48.8	10.1	1.9
(S) Finland 2000	2000	11.1	31.2	44.3	12.3	1.1
Estonia 2000	2000	11.3	28.7	38.5	3.4	18.1
Serbia and Montenegro 1998	1998	13.9	30.7	41.0	4.6	9.8
(L) Canada 2001 e/	2001	14.4	31.6	39.3	14.8	0.0
Romania 1992 d/	1992	17.9	39.5	41.9	0.7	0.0
(C) Ireland 2000	2000	20.5	17.6	36.2	25.7	0.0
(C) Portugal 1998 * d/	1998	20.9	28.3	19.5	31.2	0.0
Slovenia 2000	2000	22.0	27.1	40.5	9.0	1.5
Croatia 1999 c/	1999	22.0	54.4	17.2	6.0	0.4
(S) Netherlands 1998	1998	22.3	28.0	37.5	12.2	0.0
(S) Iceland 1993 *	1993	23.2	30.1	24.0	22.1	0.0
(S) Norway 1990	1990	23.8	38.0	38.1	0.0	0.0
Bulgaria 2000	2000	24.3	48.2	24.5	3.0	0.0
Latvia 2000	2000	25.6	28.0	42.7	3.7	0.0
(L) United States 1999	1999	26.6	25.4	34.4	13.5	0.0
Luxembourg 2001 d/	2001	26.7	27.0	26.6	17.2	2.6
(C) Italy 1991 * c/	1991	26.9	42.8	19.6	10.8	0.0
(C) Austria 2001	2001	27.6	27.9	29.2	15.3	0.0
Hungary 1996 d/	1996	28.5	27.3	40.1	4.0	0.0
Poland 1995 d/	1995	29.3	30.8	39.3	0.0	0.6
(C) Germany 1998 *	1998	29.6	48.3	13.9	8.2	0.0
Lithuania 2000	2000	29.7	32.7	32.0	5.6	0.0
(S) Sweden 1993	1993	31.5	34.6	23.2	4.9	5.8
Belgium 1991 b/	1991	31.8	29.7	34.1	4.2	0.0
Czech Republic 1998	1998	32.2	33.0	33.6	1.1	0.0
(C) Spain 1991 e/	1991	33.8	23.9	42.3	0.0	46.7
(C) France 1999 *	1999	34.9	31.4	23.4	10.3	0.0
(S) Denmark 2001	2001	38.6	29.8	25.8	5.7	0.0
(L) United Kingdom 2000 *	2000	41.0	22.0	25.0	13.0	0.0

TFYROM - The Former Yugoslav Republic of Macedonia

* Changes in the construction's periods:

Azerbaijan: Before 1918, 1918-1940, 1941-1960, 1961-1970, 1971-1988, 1989 and later

France: Before 1949, 1949-1974, 1975-1989, 1990 and later

Germany: Before 1919, 1919-1948, 1949-1978, 1979-1986, 1987-1990, 1991 and later

United Kingdom: Before 1945, 1945-1964, 1965-1984, 1985 and later

Italy: Before 1919, ..., 1961-1971, 1972-1981, 1982 and later

Iceland, Portugal: last group 1981 and later

No data on dwellings constructed after: Spain (after 1986), Ukraine and Serbia and Montenegro (after 1996), Norway (after 1991); Ukraine (before 1946)

Notes:

1/ In million square meters

2/ Data refer to dwellings begun

3/ Data refer to owner-occupied dwellings

4/ Data refer to occupied dwellings only

5/ Data refer to main residences only

6/ Data refer to owner-occupied dwellings in private sector, and housing cooperatives

Annual number of dwellings completed, 1990-2000

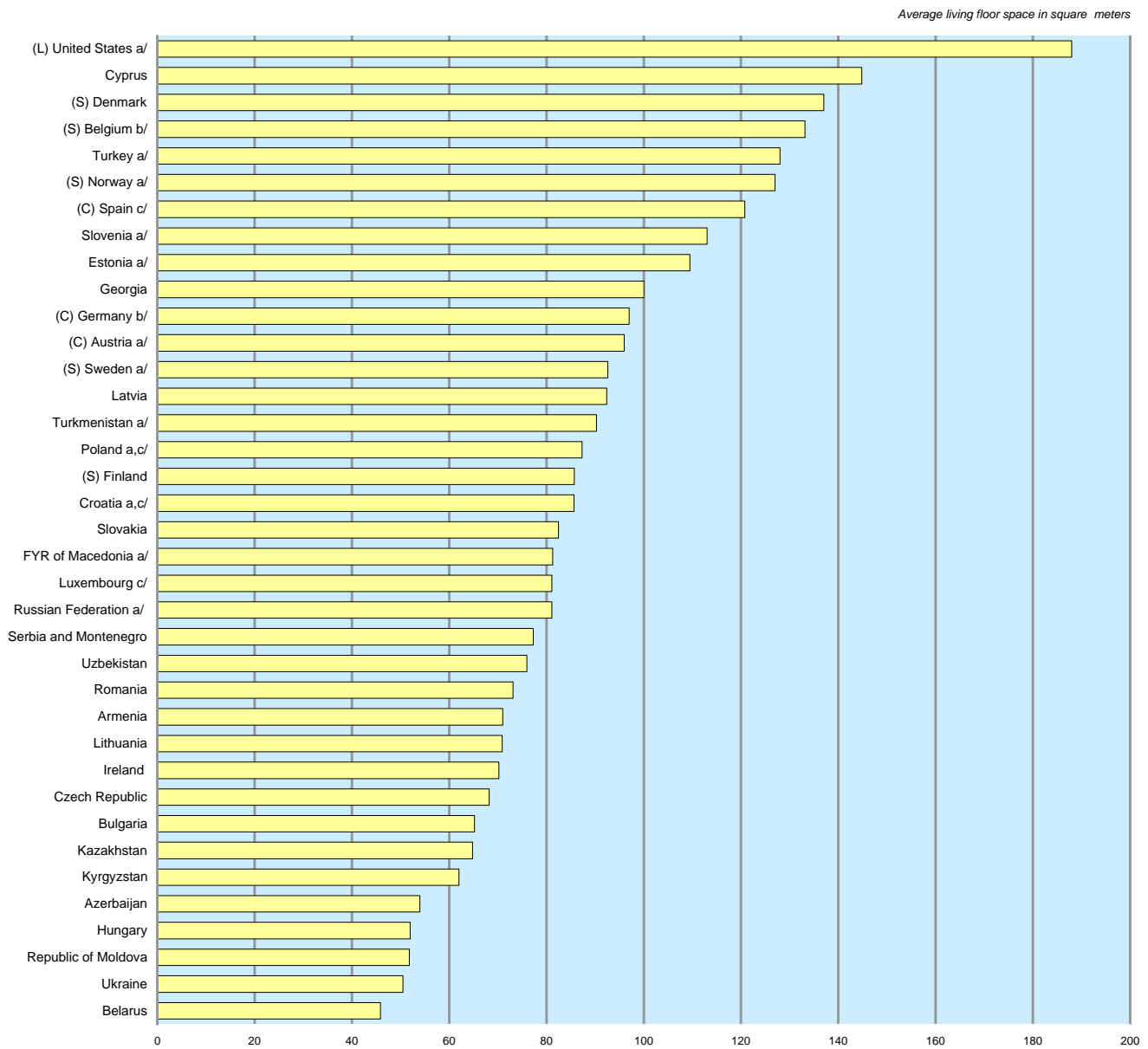
	Notes	Total dwellings (1 000)					
		1990	1992	1994	1996	1998	2000
European Union:							
(C)Austria		41.8	40.9	48.9	58.0	57.5	53.8
(S)Belgium		43.1	49.7	56.4	46.3
(S)Denmark		27.0	16.4	13.8	14.2	17.1	15.6
(S)Finland		65.0	37.0	27.0	21.0	30.0	33.0
(C)France		336.0	299.0	399.0	356.0	337.0	...
(C)Germany		256.5	374.6	572.9	559.5	500.7	...
(C)Greece		120.2	85.1	80.6	86.7	97.4	89.4
(C)Ireland		19.5	22.5	26.9	33.7	42.4	49.8
(C)Italy		...	211.5	194.0	172.0	150.0	...
(C)Luxembourg		2.5	3.0	2.7	2.2	2.6	...
(S)Netherlands		101.4	90.5	92.3	95.0	95.5	74.8
(C)Portugal		...	55.0	62.0
(C)Spain		...	227.3	237.2	266.0	364.1	457.7
(S)Sweden		58.0	57.0	21.6	17.9	14.1	15.9
(L) United Kingdom	a	203.4	179.4	193.4	188.9	179.7	179.2
Other Western Europe:							
(C)Cyprus		8.1	7.8	8.4	7.2	6.6	5.1
(S)Iceland		1.8	1.6	1.7
(S)Norway		27.1	17.8	17.8	17.9	20.7	19.5
(L)Switzerland		42.5	39.2	52.0	44.2	35.2	32.9
(C)Turkey		232.0	268.9	245.6	267.0	238.6	245.2
Central and Eastern Europe:							
Bulgaria		26.0	18.0	8.7	8.1	4.9	8.8
Croatia		18.6	8.1	9.7	12.6	12.6	...
Czech Republic		45.2	36.5	18.2	14.9	22.6	25.4
Estonia		7.6	3.4	2.0	0.9	0.9	0.7
Hungary		43.8	25.8	20.9	28.3	20.3	21.6
Latvia		13.3	4.9	3.4	1.5	1.4	0.9
Lithuania		22.1	12.7	6.9	5.6	4.2	4.5
Poland		134.2	133.0	76.1	62.1	80.6	87.0
Romania		49.1	27.7	38.1	32.5	30.2	28.1
Serbia and Montenegro		45.0	25.2	17.4	15.2	13.1	12.7
Slovakia		...	16.4	6.7	6.3	8.2	12.9
Slovenia		7.8	6.5	5.5	6.2	6.5	6.5
The former Yugoslav Republic of Macedonia		10.2	6.6	4.8	5.3	3.2	5.3
Commonwealth of Independent States:							
Armenia	b	1,460.0	360.0	305.0	174.0	302.0	194.0
Azerbaijan		34.3	24.5	9.4	5.6	5.5	4.8
Belarus		86.1	71.0	50.9	38.2	47.7	39.4
Georgia		11.5	5.8	0.9	1.1	0.8	1.4
Kazakhstan		114.0	67.0	28.8	15.7	10.5	10.9
Kyrgyzstan		22.4	13.5	5.0	4.2	6.6	5.0
Republic of Moldova		23.7	14.5	7.5	4.0	3.8	2.3
Russian Federation		1 044.0	682.4	610.9	481.5	387.7	373.4
Tajikistan		28.3	10.2	3.3	3.4
Turkmenistan		21.3	20.4	16.5	7.7	5.5	5.2
Ukraine		289.0	227.0	147.0	88.8	70.0	62.9
Uzbekistan		125.5	85.6	66.3	74.5	79.7	76.1
North America:							
(L)United States		1 308.0	1 157.5	1 346.9	1 412.9	1 474.2	1573.7
Other member countries:							
Israel		19.9	70.1	33.9	52.7	53.5	42.7

Source: UNECE Environment and Human Settlements Division, Housing database

a/ Permanent dwellings completed.

b/ In thousand square meters.

Average estimated size of dwellings, 2000



Source: UNECE Environment and Human Settlements Division, Housing database.

a/ Refers to average useful floor space per dwelling completed (m²).

b/ Data for 1998.

c/ Data for 1999.

Average estimated size of dwellings, 2000

Sorted from Small to Large Year 2000

Belarus	45.9 c
Ukraine	50.5
Republic of Moldova	51.8
Hungary	52.0
Azerbaijan	54.0
Kyrgyzstan	62.0
Kazakhstan	64.8

Bulgaria	65.2
Czech Republic	68.2
Ireland	70.2
Lithuania	70.9
Armenia	71.0
Romania	73.1
Uzbekistan	76.0
Serbia and Montenegro	77.3
Russian Federation a/	81.1 a
Luxembourg c/	81.1 c

FYR of Macedonia a/	81.3 a
Slovakia	82.5
Croatia a,c/	85.7 a,c
(S) Finland	85.7
Poland a,c/	87.3 a,c
Turkmenistan a/	90.3 a
Latvia	92.4
(S) Sweden a/	92.6 a
(C) Austria a/	96.0 a
(C) Germany b/	97.0 b

Georgia	100.0
Estonia a/	109.5 a
Slovenia a/	113.0 a
(C) Spain c/	120.8 c
(S) Norway a/	127.0 a
Turkey a/	128.0 a
(S) Belgium b/	133.1 b
(S) Denmark	137.0
Cyprus	144.8
(L) United States a/	188.0 a

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9.25

Explanatory Notes

a Refers to Average useful floor space per dwelling completed (M2)

b Refers to year 1998

c Refers to year 1999

Housing stock by size and tenure						
Year	Notes	Total dwellings	% of dwellings with			% of owner occupied dwellings
		1 000	less than 3 rooms	3-5 rooms	6 rooms or more	
European Union:						
(C) Austria	2000	3 261	30.7	60.0	9.3	56.4
(S) Belgium	1991	3 742	11.2	69.3	19.6	64.6
(S) Denmark	2000	2 509	24.7	62.1	13.2	51.1
(S) Finland	2000	2 512	24.5	62.7	11.8	58.1
(C) France	1999	a 23 810	19.1	67.8	13.0	54.7
(C) Germany	1998	37 050	8.4	71.6	19.9	37.8
(C) Ireland	2001	1 337	5.0	52.3	42.7	80.0
(C) Italy	1991	19 736	8.5	76.2	15.3	68.0
(S) Netherlands	2000	6 762	11.5	76.6	11.9	50.4
(C) Portugal	1991	3 056	8.9	71.9	19.2	64.7
(S) Sweden	1990	b 4 044	33.5	55.3	8.8	37.8
(L) United Kingdom	1996	b 24 495	2.1	60.3	36.1	68.2
Other Western Europe:						
Cyprus	1992	b 184	5.2	53.2	41.5	64.4
Monaco	2000	16
Norway	1990	j 1 751	20.3	60.9	18.8	78.2
(L) Switzerland	1990	3 575	21.0	54.0	25.0	31.0
Turkey	1994	c 13 341	14.1	82.5	2.8	70.9
Central and Eastern Europe:						
Albania	1998	733	67.6	30.6	1.7	94.8
Bulgaria	1998	c 3 438	41.7	58.3	...	92.5
Croatia	1999	c,d,g 1 645	50.0	40.6	9.5	61.3
Czech Republic	1998	3 731	33.9	61.5	4.6	46.2
Estonia	2000	c 623	42.3	25.2	0.2	94.8
Hungary	1996	3 767	17.6	78.9	3.5	89.3
Latvia	1998	e 955	62.6	37.4	-	49.0
Lithuania	2000	1 356	55.2	44.8	0.0	97.6
Poland	1996	11 547	18.8	71.8	9.4	56.4
Romania	1999	e,g 7 883	56.7	40.2	3.1	72.4
Serbia and Montenegro	1997	e 3 152	52.1	47.8	-	-
Slovakia	1991	e 1 618	38.4	53.1	8.6	50.2
Slovenia	1996	e,g 712	47.5	43.3	9.2	58.2
The former Yugoslav Republic of Macedonia	1994	548	27.7	72.3	...	95.1
Commonwealth of Independent States:						
Armenia	1998	c,f 516	47.9	57.4	...	96.3
Azerbaijan	1998	e 1 526	57.9	42.1	...	73.8
Belarus	1999	3 800	61.7	34.0	0.2	63.0
Georgia	1997	e 793	51.9	48.1
Kazakhstan	1997	e 4 479	43.0	57.0
Kyrgyzstan	2000	f 1 062	39.9	60.2	0.0	100.0
Republic of Moldova	1996	1 227
Russian Federation	1995	e 52 681	63.3	33.6	...	41.0
Turkmenistan	1998	e ...	17.0	83.0	...	85.3
Ukraine	1998	1 008
Uzbekistan	1995	e ...	34.1	65.9
North America:						
(L) Canada	1999	h 11 553	3.1	41.2	55.8	63.7
(L) United States	1999	i 102 803	1.4	50.7	47.9	61.3
Other member countries:						
Israel	2000	1 737	70.8

Source: UNECE Environment and Human Settlements Division, Housing database

- a/ Permanent dwellings only.
b/ Sum of percentages by number of rooms does not equal 100% due to dwellings with unknown number of rooms.
c/ Data refer to total dwelling stock.
d/ Number of rooms: less than 3 rooms, 3-4 rooms, 4 rooms and more.
e/ % of dwellings with 3-5 rooms includes dwellings with more than 5 rooms.
f/ In thousand square meters.
g/ % of owner occupied dwellings based on 1991 data.
h/ Data refer to private households in occupied private dwellings.
i/ Excludes seasonal dwellings.
j/ Data refer to private households.

Dwelling facilities						
Notes	Year	Total dwellings*	% of dwellings equipped with:			
		(1 000)	Piped water	Fixed shower or bath	Flush toilet	Central heating
European Union:						
(C) Austria	2001	3 284	99.9	97.9	98.9	77.1
(S) Belgium	1996	3 974
(S) Denmark	2000	2 509	...	93.6	97.9	98.3
(S) Finland	1998	2 450	96.7	90.9	94.9	91.5
(C) France	1999	28 702	...	99.2	...	82.8
(C) Germany	a 1998	37 050	86.9
(C) Ireland	2000	1 293	97.0	90.9	96.0	59.0
(C) Italy	a 1991	19 736	99.1	95.9	98.8	26.4
(C) Luxembourg	1991	139	100.0	100.0	100.0	99.1
(S) Netherlands	1998	6 522	...	96.1	...	86.3
(C) Portugal	a 1999	3 056	87.2	82.2	88.8	...
(C) Spain	b 1991	17 220	99.3	95.5	97.2	9.1
(D) Sweden	2000	4 294	100.0	100.0	100.0	100.0
(L) United Kingdom	2001	21 266
Other Western Europe:						
Cyprus	2000	287	98.3	91.6	92.0	25.4
Iceland	1993	97	100.0	100.0	...	100.0
Monaco	2000	16
(S) Norway	1990	1 751	...	95.8	96.1	...
(L) Switzerland	2000	3 575
(C) Turkey	1994	13 383	85.6	83.6	69.6	8.3
Central and Eastern Europe						
Bulgaria	2001	3 686	87.5	71.3	67.0	12.7
Croatia	1999	1 645	87.1	77.0	81.6	25.4
Czech Republic	1998	3 731	98.2	97.4	97.0	79.8
Estonia	c 2000	623	83.9	66.9	74.0	67.9
Hungary	1999	4 061	84.8	79.2	76.2	47.6
Latvia	2000	941	83.2	67.0	77.8	64.9
Lithuania	d 2000	1 356	75.6	68.8	74.0	71.8
Poland	a 2001	11 946	93.3	82.2	82.3	72.9
Romania	1992	7 682	51.4	46.1	44.9	38.9
Serbia and Montenegro	2000	3 189	79.8	68.6	...	21.2
Slovakia	2001	1 712
Slovenia	2000	712	97.6	88.1	90.9	65.4
The former Yugoslav Republic of Macedonia	1994	583	82.8	67.8	59.5	12.0
Commonwealth of Independent States:						
Armenia	f 2000	66 728	98.0	86.0	...	81.0
Azerbaijan	g 1996	1 504	54.4	25.2	39.4	27.9
Belarus	i 2000	3 819	60.9	52.7	58.4	59.6
Georgia	a 1997	793	89.7	51.6	88.4	51.8
Kazakhstan	1997	4 479	51.1	40.9	...	47.0
Kyrgyzstan	a 1999	1 054	37.8	24.4	...	30.4
Republic of Moldova	e 2000	1 286	36.3	31.3	31.6	30.7
Russian Federation	j 2000	2 779	73.0	64.0	...	73.0
Turkmenistan	1999	...	53.8	30.0	...	30.5
Ukraine	h 1998	6 584	98.6	86.1	91.4	95.5
North America:						
(L) Canada	1990	10 013	96.0	94.0	...	94.6
(L) United States	1999	112 292	99.2	99.4	99.4	88.1

a/ Occupied dwellings only. Sources: UNECE Environment and Human Settlements Division, Housing database.
b/ Data refer to main residences only.
c/ Excluding private detached houses.
d/ Urban dwelling stock.
e/ % of occupied dwellings with facilities refers to urban dwellings in 1998.
f/ In thousand square meters.
g/ % of dwellings classified by equipment refers to occupied dwellings only.
h/ Data refer to private sector and housing cooperatives.
i/ In thousand apartments.
j/ In million square meters.

* The data on total dwellings refers to the same year as the % of dwellings equipped with facilities, therefore in some cases it is provided for a different year than in Table 7.1.

Rent indices*		1995=100						
Notes		1995	1996	1997	1998	1999	2000	2001
European Union:								
(C) Austria		100	104	107	109	114	116	...
(C) Belgium		100	102	104	105	107	108	111
(S) Denmark		100	102	105	107	110	113	117
(S) Finland		100	103	105	109	112	115	...
(C) France		100	102	104	106	107	107	108
(C) Germany		100	103	106	107	108	109	111
(C) Greece		100	110	118	126	132	137	142
(C) Ireland		100	100	103	104	93	101	118
(C) Italy		100	108	115	121	126	129	131
Luxembourg	a	...	100	103	106	109	112	115
(S) Netherlands		100	104	108	112	116	119	122
(C) Portugal		100	103	107	111	114	118	123
(C) Spain		100	108	115	121	125	130	...
(S) Sweden		100	102	101	100	98	99	102
(L) United Kingdom		100	105	108	111	115	119	123
Other Western Europe:								
Cyprus		100	105	110	114	117	123	125
Iceland		100	100	103	108	119	135	142
Malta		100	103	108	111	111	114	119
(S) Norway		100	102	104	106	109	114	119
San Marino		100	104	105	106	113
Switzerland		100	101	102	102	103	104	107
Turkey	a	...	100	182	346	646
Central and Eastern Europe:								
Albania		100	113
Bulgaria		100	240	3211	3227	3243	4490	...
Croatia		100	104	108	132	138	144	146
Czech Republic		100	114	135	169	189	201	223
Estonia	b	100	119	125	111	121	124	136
Hungary		100	139	161	189	215	249	292
Latvia		100	108	145	193	197	201	206
Lithuania		100	131	161	183	199	203	208
Poland	c	100	130	166	206	120	144	164
Romania		100	127	208	319	9586	15188	17175
Serbia and Montenegro		100	124	196	283	643
Slovakia		100	105	112	119	155	205	240
Slovenia		100	191	215	220	231	244	277
The former Yugoslav Republic of Macedonia		100	106	106	106	106	116	...
Commonwealth of Independent States:								
Armenia		100	289	377	638	639	641	643
Belarus		100	186	216	280	431	1660	3426
Georgia		100	102	117	118	129	136	140
Kazakhstan		100	202	279	309	320
Kyrgyzstan		100	181	246	283	390	357	546
Russian Federation	d	100	151
North America:								
(L) Canada		100	101	103	104	105	106	108
(L) United States		100	103	106	109	113	117	122
Other member countries of the ECE:								
Israel		100	116	128	136	139	136	142

Source: ILO LABORSTA database.

a/ 1996=100.

b/ Since 1998, 1997=100.

c/ Since 1999, 1998=100.

d/ Rent for municipal housing.

* Note: Some of the rent indices relate to rent, both in new and old dwellings; others are limited to rents in old dwellings only; others refer to rents including rates and water charges or even fuel and light and charges for repair and maintenance, i.e. sometimes the rent indices comprise what is generally termed as "Housing" costs.