Comparative Housing Research*

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ABSTRACT
The paper reviews major examples of comparative housing research which have been published in the last twenty years and suggests that the dominant approach — grounded in pluralism and convergence theory — which they exhibit is inadequate. Future studies need to be both more detailed and wider in scope, examining the dynamic of the interrelations between the institutions and the social forces involved in the provision of housing. Such a perspective is briefly developed and related to current developments in the housing markets and policies of some advanced capitalist societies. The paper concludes with a discussion of some of the practical problems of cross-national housing research.

This paper discusses the state of cross-national comparative housing research, focusing on Western Europe and the USA. Research into housing in Third World countries is characterized by some of the same theoretical perspectives discussed in this paper and there are even closer parallels between conditions in countries such as Australia and even Japan and those in Western Europe and the USA. But our own comparative housing research has concentrated on these latter countries and so it is mainly to these that we shall refer.¹ We shall have several criticisms to make of international housing studies, including their over-emphasis on policy analysis and relative lack of attention to housing market processes and their inadequate theoretical foundations. Nevertheless, we believe that comparative studies are of considerable intellectual and practical value, for example, in helping us to understand the current and future directions that housing markets and policies are moving in. We shall then consider some key issues for future comparative research;

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principally the increasingly sharp contradictions between the aims of
housing policy and actual housing market developments, more evident
in some countries than in others, but an issue of considerable academic
and political importance. But first we turn to a critical and necessarily
selective review of already published work.

THE LIMITATIONS OF EXISTING COMPARATIVE HOUSING
RESEARCH

Our concern in this paper is mainly with a number of recent comparative
housing studies published by those working within the disciplines of
political science and social administration. But we shall also refer briefly
to one or two of the more notable works written by economists. Although
of greater interest for our purposes, these academic studies only represent
a small proportion of the comparative literature. There is a considerable
mass of more immediately policy-oriented material produced by govern-
ments. A full review of this literature would require another paper —
here we will confine ourselves to a few comments on this work.

Policy makers have tended to be interested in comparative research (as
all research) because they hope that it will illuminate in some fairly direct
way the problems that they face, legitimate decisions already taken, or
even provide some solutions. The extent to which such research satisfies
the consumers' demands depends not only on the quality of the work
but on many other factors, some of which are not under the control of
the researchers or of those who commission them. But a commonly-found
fault is that much of this work has been too superficial or too diffuse
to make an impact. Many of the reports produced by the international
agencies are of this nature. A recent example is a report on major trends
in housing policy in ECE countries produced under the auspices of the
ECE Housing, Building and Planning Committee (Economic Commission
for Europe, 1980). While factually interesting, such reports tend to be
analytically anodyne — perhaps because of the political constraints
under which they are produced. Nevertheless, there are some faults
which could possibly be rectified. For instance, even the data in these
reports often leave much crucial detail unreported. To give just one
example, the UN provides data on housing tenure which only distinguishes
between the rented sector as a whole and owner occupation. The sort
of conclusions which can be drawn from such aggregated data are rarely
likely to be of much value; a country could change over time from having
half its housing stock in the private rented sector to having half in the
public rented sector — indicating a major change in housing policies and
the housing market — without it being apparent from these statistics.
In fact, the trends revealed by much of the internationally-collected data are often either so general as to be of little substantive interest or have a significance which is hard to assess. This is made worse because there is often very little attempt made to explain the meaning or causes of the changes which the data reveal.

Another approach has been to draw on the knowledge of a group of national experts to provide a more detailed account of aspects of housing markets and policies in their respective countries. This is often the basis for the reports produced by international agencies. In some cases, such exercises have also been sponsored by research foundations. The method has obvious advantages but, if the operation lacks a common framework and conception, it is likely to lead to little more than a rather diffuse collection of national snapshots, from which, again, only rather general conclusions can be drawn. A chapter on foreign housing finance policies contained in the appendices to the 1977 British Housing Policy Review illustrates this (Department of the Environment, 1977). Hastily conceived and executed, the report on which this chapter was based was prepared by commissioning eight foreign housing experts to write short reports on what they felt were the major features of the recent development of housing finance in their respective countries. Such a vague commission — limited because of the shortage of time and money available for the exercise — produced a series of reports which were individually often of considerable interest, but they reflected specific national and personal preoccupations and perspectives. There was only a limited degree of commonality in the matters described in each report and this meant that only very restricted and general conclusions could be drawn (and in the form in which the report was finally published none at all was attempted).

A final category of policy-oriented comparative housing research consists of work which concentrates not on major trends and developments but on policy innovations and the possibility of their transference. There are several, albeit rather minor, examples of recent British housing policy developments which seem to some degree to have been inspired by foreign experience. For example, information about tenant management in public housing and urban homesteading in the USA has had some influence on those who have advocated these developments in Britain, and the institution by the last Labour government of a subsidized savings scheme for owner occupation probably owed something to the existence of such schemes in France and West Germany. But often the ‘research’ into these foreign innovations has been little more than information gathering about their immediate details, with very little attempt to assess
whether or how they can be ‘transferred’ from one nation to another, given the considerable differences in the economic and political context which are likely to exist in the two countries concerned. (For a discussion of this problem in the context of US/UK housing policy comparisons see Harloe, 1979.)

This brief discussion of policy-oriented comparative studies has served to highlight one of the key considerations which any cross-national housing research has to confront; the necessity to provide a detailed yet broad examination of national housing markets and policies which explores not just interrelationships within the ‘housing system’ but the ways in which housing provision is moulded by the wider national economic and political context (and today, increasingly, the international context). With this in mind, we now examine some recent academic studies. Clearly, there are many constraints on the more policy-oriented comparative research which make problematic the achievement of the sort of work we feel to be necessary. We might expect both a broader and more detailed view to be provided by those who do not normally labour under such constraints.

Most of the academic studies to be discussed do make some attempts to view national housing developments in their socio-economic and political context. However, we shall argue that these attempts have been severely limited. A first point to note is that many of these studies have been concerned with discussing housing policies rather than housing markets and concentrate on the distribution and consumption of housing with only very limited references to its production. Such comparative studies have, on the whole, shared similar political and theoretical assumptions to those adopted by what has been the dominant approach to national housing studies. Politically they have fallen within the reformist perspective which, as Headey (1978) notes, is associated with social democracy in Europe and with the liberal wing of the Democratic Party in the USA. Theoretically, implicitly or explicitly, they have often adopted many of the perspectives and assumptions of the structural-functionalist sociology — especially of that variant which has been labelled convergence theory — and of the pluralist view of the political process associated with it. Studies which broadly fall into this category include those by Abrams (1965), Donnison (1967), Mandelker (1973), Fuerst (1974), Heidenheimer et al. (1976)(which has a chapter on housing policy), Headey (1978), Duclud-Williams (1978) and Donnison and Ungerson (1982).

There is, of course, an extensive critical literature on this formerly dominant political/theoretical stance. For example, Gouldner (1971) and
many others have attacked the limitations and political bias of functionalism and its conception of applied social science in relation to the welfare state; Lukes (1974) has provided a brief but penetrating critique of the limitations of the pluralist analysis of political power; Westergaard and Resler (1975) have examined the claims of the convergence theorists in the context of British social structure and policy, and so on. There is not space here to discuss this intellectual/political current or the extensive critique which it has generated. We can only hope to illustrate some of its limitations in the context of comparative housing studies. But among its assumptions (all of which have been challenged on empirical and theoretical grounds) were the following.

1. That industrialization acted as the main generator of social change, leading to a more complex and differentiated social structure.

2. That, as this process continued, there would be a convergence in the social and political structures of East and West with an 'end of ideology'. Social problems could be viewed as 'technical' questions — requiring a scientific not an ideologically-biased response — and were very similar in all societies at a given stage in industrial development.

3. That the end product of this process would be a 'mixed economy' with substantial state intervention to modify and regulate the operations of private enterprise.

4. That in this system most significant social interests were represented by pressure groups and political parties, with the state acting as a neutral arbiter, adjudicating in the 'public interest'.

5. That applied social science had a key role to play, helping government to arrive at the best solution to the problems it faced by providing a rational and factual analysis of social structure and policy impact.

6. That the basic values around which society was or should be organized concerned social equality, or at least equality of the conditions of access to life chances. Government policies were mainly concerned with ensuring that this version of equality was put into practice, or they ought to be. (We shall comment later on this 'is-ought' ambiguity.) Academic analyses of state policies tended to focus on assessing the extent to which 'equality' was being achieved. If it was not, typically this was held to be because of the persistence of inappropriate, 'unscientific' ideology and/or poor institutional arrangements and/or governmental ignorance. Solutions centred on the need to collect more information (the role of social science) or to change attitudes (the role of politicians and the liberal elite).
Some of the studies we have classified under this heading are more explicit about their assumptions than others and some are more theoretically or politically sophisticated. Headey’s book, for example, being written by a political scientist, clearly adopts a pluralist analysis of policies together with the assumptions and aspirations of social democratic/liberal reformism. In contrast, Fuerst’s book, as he acknowledges, ‘is not an academic exercise’ but nevertheless shares many of the same concerns as Headey, focusing on the relation between housing policy and inequality and stressing the need for increased government intervention to control and modify the workings of the private market in housing — without any discussion of how this could occur or whether increased intervention would necessarily bring about such an end. Mandelker’s book on housing subsidies in Britain and the USA is also concerned with whether policies are reducing housing inequality and with the need for increased government intervention (‘comprehensive’ housing policies, as Donnison called them). Abrams argues along very similar lines. Perhaps because he was American and wrote about housing in the Third World, his book is more explicit than the others about some of the political assumptions of liberalism — the need for expanded and more egalitarian housing policies as a bulwark against the spread of irrational ideologies (especially those coming from the east) and the unfreedom that they engender in newly-industrializing ‘modernizing’ nations.

The work by Heidenheimer and his associates, and the recent book by Duclaud-Williams which compares British and French housing policy, stand somewhat apart from the texts mentioned so far because they concentrate on analysis rather than analysis/prescription. But they take virtually the same approach grounded in pluralism and convergence theory. Both books reject some aspects of mainstream (mainly American) political science — such as an oversimplistic concentration on the decision-making process and the role of interest groups in policy formation, in favour of an examination of broader and longer-term patterns of policy development. Nevertheless, in practice much of their discussion centres on the politics of pressure groups and parties and the differing ideologies that these represent, in a way which shares the limitations of much mainstream political science. Thus the existence of different national ideologies, institutional arrangements and traditions of state intervention are taken as largely ‘given’. They fail to explore in any detail the ways in which these factors help to advance and maintain certain material interests. Also they assume that most state action is in the ‘public interest’ — a response to ‘housing needs’ or ‘problems’ expressed, above
all, by different groups of consumers and involving questions of access and cost for such individuals. Insofar as Heidenheimer et al. do recognize that social policies in the United States, especially in housing, may have served other goals less in the 'public interest', this is, they state, because of institutional and ideological factors, the reasons for whose existence remain unanalysed.

Donnison's *Government of Housing* is perhaps the best known and one of the most interesting studies which falls into the genre that we have been discussing. Indeed, in the new (1982) edition of this book, written by Donnison and Ungerson, they refer to the consensus which at the time of the first (1967) version of the book underlay the effects of the 'liberal minded researchers, journalists and civil servants' whose purpose was to keep 'opinion moving in humane directions' so to achieve, through sensitive and well-informed government policies, increased equality and the maintenance of full employment (Donnison and Ungerson, 1982, p.162). Moreover, Donnison and Ungerson recognize that the political and economic bases on which this 'liberal paradigm' (as Marris, 1982, has called it) rested no longer exist, although at the end of the new version of the book it only seems possible to set out what policies ought to be adopted to further the old reformist housing objectives and implicitly to appeal for the re-establishment of the political, economic and social consensus which might make their achievement possible. One problem with this appeal might be that, as they recognize earlier in the book, in the 1960s when the consensus existed 'Britain did not in fact grow significantly more equal' (Donnison and Ungerson, 1982, p.163).

Although some of the earlier features of the 'reformist' approach to housing policy are not repeated in Donnison and Ungerson's rewrite of the previous book, much remains the same in the two volumes. Donnison's analysis shares with the pluralist/convergence theorists (though he does not explicitly refer to any of these writers) the idea of a progression in the scope and nature of policy intervention as industrialization develops. Like them, he sees the state moving towards a comprehensive range of interventions in what will remain basically private enterprise economies, aiming to modify — in the direction of greater social equality — the workings of this system. Eastern Europe is converging with the West, with a state-run social system being increasingly modified by market or quasi-market processes. Even the end of ideology thesis is explicitly espoused in the first book — 'as the dogmas of capitalism and communism recede, the fundamental problems of housing policy emerge more clearly' (Donnison, 1967, p.113) — although, interestingly, this
phrase is omitted from the second book. But the convergence thesis remains, with housing problems being principally determined by the stage of economic development, regardless of the type of society concerned or its past history. ‘It could be argued that there is a convergence of policies between East and West which shows that certain kinds of housing problems are universal in economies at particular stages of development’ (Donnison and Ungerson, 1982, p.93).

Of course, Donnison and Ungerson recognize that detailed housing policies may vary a good deal from country to country. However, despite a certain ambiguity on this point, they suggest that housing policies can be classified according to whether they, more or less, embody the concept of ‘residual’ or of ‘institutional’ welfare (to borrow terms which have been applied to the development of social policy more generally — although they use a different terminology). Policies in Eastern Europe provide, in the earlier years of these communist regimes at least, a further ‘normative’ variant.

But this classification, together with its evolutionary assumptions, seems to be a typology with little explanatory power. They suggest, for example, that countries which follow ‘social’ housing policies (policies whose aid is mainly limited to the poor) do so because they have a longish industrial history plus ‘other characteristics’ (Donnison and Ungerson, 1982, p.74). So important questions about how and why a particular mix of policies come about, what interests they serve and how these interests operate to maintain or change such policies are passed over. Moreover, the tendency to focus on housing policies rather than arrangements for the production and distribution of housing and the role that state policies as a whole play within these, means that many of the ‘contextual’ factors which structure housing policies are ignored or given very limited attention. Also, if some evolutionary pattern is evident (and the authors — while at some points denying this — more generally write as if it is or ought to be true) there is very little detailed consideration of why this is the case beyond general references to the problems generated by industrialization and the presumption of the necessity for a governmental response to them. The reasons for such a necessity, if it exists, do not receive much attention. As Taylor-Gooby and Dale (1981) have written, this approach to social policy tends to analyse the state’s performance within the limits it sets itself. Broader questions about what determines where these limits are set are largely ignored. Insofar as any explanation is given of, for example, the trend to comprehensive housing policies, this is seen as a response to urgent needs which is then maintained and developed, in part as a consequence
of the new problems which this intervention generates. Policies are formed by the interaction of political parties and pressure groups conceived within a pluralist framework. Of course, at a certain level much of this is true, but such general statements provide little insight into important questions such as which urgent needs are responded to and why.

Headey's book shares the same general approach as Donnison and Ungerson, but is considerably less sophisticated and factually interesting or even accurate. Marcuse (1982) has, in a recent review of this book, pointed to some of the lacunae of such analyses. He refers to Headey's analytical framework as 'warmed over mainstream political science ... "political actors" make decisions ... the key actors are political parties, interest groups, bureaucracies and public opinion. Just as "public opinion" somehow acts, so do policies have objectives, without any person or group having to be named ("the objective of economic policy is to improve living standards"). Differences in national housing policies are thought to be satisfactorily explained by reference to factors such as, in the case of the USA, 'social conservatism' or 'inadequate incentives to private enterprise'. The purpose of policy is — it is assumed — mainly to promote greater equality in housing, with the state (the 'benevolent state' as Marcuse has called it) seen as an instrument which responds — or aims to respond — to social needs, i.e. the needs of the housing consumer. Headey finds that this objective — measured by indices of housing inequality such as the distribution of subsidies with respect to income — is far from being achieved. Given this, it is perhaps surprising that he does not consider whether redistribution in favour of less advantaged housing consumers is really what state housing policies are mainly about. Instead he is content with suggesting that a reference to problems of 'operational and political feasibility' adequately explains why this objective is not achieved (Headey, 1978, pp.234-6).

As in other studies, because of the limitations of this approach — the focus on policy alone, the assumptions about the role of the state, the reluctance to explore the political, economic and ideological determinants of the forms in which housing is provided (what Ball, 1982a, has recently called the social relations of housing provision) — Headey ends up by explaining national differences in housing policy by means of abstract concepts and categories. Reference has already been made to 'political and operational feasibility', but, in a manner which is reminiscent of Donnison and Ungerson, Headey also has a typology into which he fits the three countries with which he is concerned (though he uses this typology in a considerably cruder and more rigid way than
Donnison and Ungerson). Thus housing policy in the USA represents a ‘private enterprise’ approach, in Sweden it represents the ‘socialist market’ approach, and in Britain the ‘welfare approach’. Such typologies provide little more than classificatory labels. Moreover, it proves in practice particularly difficult to force three housing systems, all based on private enterprise provision which is to a considerable extent supported by the state (often for reasons which have more to do with producer than consumer interests), into three distinct and neatly-defined ‘types’. The intrinsic value of such an attempt, really little more than a fairly arbitrary way of constructing some basis for making comparisons, is dubious.

As we have stated, there have been many criticisms of the theoretical adequacy and the political assumptions of the ‘liberal paradigm’. We do not intend to repeat their details here but will merely summarize a few of the key points as they apply to the body of comparative housing research that we have been discussing. These studies, in varying degrees, have certain common features.

1. They embody a narrow and empirically valid conception of what housing policy is, or is mainly, about; with a focus on policy as a response, adequate or inadequate, to housing consumers’ needs. (They also embody a sociologically and politically naive concept of need; this could be the topic for a whole paper in itself.)

2. They fail to examine systematically the ways in which housing policy relates to, and is structured by, the arrangements for housing provision as a whole and more general social, economic and political developments. This is perhaps a consequence of, and helps to maintain, this narrow focus on housing policy and the concentration on assessing its impact on consumer equality (or, more accurately, certain measures of equality of access). Instead of an attempt to describe and analyse differing national social relations of housing provision, there is recourse to essentially artificial typologies and concepts to classify different housing policy approaches.

3. Ultimately, national differences in housing are thought to be sufficiently explained by rather general references to differences in factors such as ideology, institutions or level of industrialization. There is no adequate examination of how and why these differences arise and are maintained, whose material interests they sustain and how they structure national housing provision. While the existence of ideological and other differences is an important feature of different national housing systems, they should not be regarded as ‘givens’ requiring no further explanation but as factors whose
existence and detailed effects it should be the task of research to explain. They should be among the objects, rather than among the conclusions, of comparative housing analysis.

Marris (1982) has suggested that the liberal paradigm lacks a theoretical approach which recognizes that inequality is a structural feature of capitalist economies, and that the state and the political system reflect this fact. The belief that government will, in principle at least, respond to rational informed, reformist pressure and opinion, prevents a more adequate perspective being developed. A clear recognition that government might not play this role would allow the problem of why the outcomes of policy are often so far from the liberal ideal to be analysed. But the dilemma is that this would also destroy the basic reliance on, or hope for, government action in the ‘public interest’ by the ‘benevolent state’. Marris writes: ‘So, despite their critical insight ... (such) works tend to end on a note of moral exhortation as if, after all, government could transcend politics, once peoples’ consciences were aroused to the shortcomings of their societies’ achievements’ (p.98). He refers here to liberal social policy analysis as a whole, but the point also applies to many of the comparative housing studies we have referred to. Such studies tend to have rather similar final chapters, a list of policies which should be implemented to bring about the desired (but so far unachieved) ends plus appeals to the need for public opinion to be roused to support them and government to have the political will to put them into practice. (See, for example, Mandelker, Headey and Donnison and Ungerson.) It is this dilemma which is responsible for the ‘is-ought’ ambiguity mentioned earlier.

We have concentrated on what seems to us to have been the dominant approach to comparative housing research. But not all housing studies have been of this type. In particular, there have been several works by economists, for example Wendt’s (1962) study of housing policy in the UK, Sweden, the USA and West Germany and Hallett’s (1977) account of housing and land policies in Britain and West Germany which have not shared the main perspectives and assumptions which we have discussed. Indeed, Hallett is explicitly and strongly critical of what he refers to as the ‘anti economic approach’ of those associated with the ‘Titmuss School’.

In common with many discussions by economists of social policy which adhere to the tenets of neo-classical economics, Wendt and Hallett conclude that housing systems which appear to rely to a considerable degree on market-based provision and allocation, and where the state plays (according to them) a more limited role, are to be preferred on the
grounds of efficiency. There is not the space here to discuss the weaknesses of these studies but they tend, even more than those approaches which we have discussed, to ignore or underplay the significance of other than narrowly-conceived economic issues and operate with a set of explanatory models which are even less empirically grounded than those adopted by the liberal/social democratic approach.

Recently, with the emergence of what has been variously labelled the 'political economy' of urbanization, the 'new urban sociology' and so on, the study of the development of housing in capitalist societies has moved in new directions and many of the assumptions of the approaches that we have been discussing have been rejected (this work is reviewed in Lebas, 1982). As yet, there are few comparative studies in this literature although Kemeny’s (1981) recent analysis of home-ownership in Sweden, Australia and Britain begins by discussing the inadequacy of the orthodox approach. In particular, he criticizes this work for having accepted as a generality the way in which housing consumption is organized (the tenure system) in certain English-speaking countries. He concludes:

The narrow empiricism and the general inability to conceptualize problems outside of traditional and politically conservative frameworks is reflected in the sociological weakness of the housing literature ... to date there has failed to emerge a body of literature which relates housing to the wider social structure ... Housing becomes a narrow specialism ... of little relevance or application to wider sociological issues (p.17).

Unfortunately, in the examination of the ‘myth’ of the superiority and inevitability of home-ownership in advanced capitalist societies which follows, Kemeny does not manage to avoid falling into some of the traps that he so clearly indentifies at the start of his book. He finds it hard, and indeed it is not easy, to follow through his own injunction to recognize that the means of provision — the content and organization of housing tenures — is socially constructed and can be seen in each country to be the product of a specific interrelationship of political, economic and ideological factors. Ultimately, he falls back on explaining differences between countries in terms which are not so dissimilar from those adopted by many of the writers whom he has earlier criticized. For example, he states that some countries have housing arrangements which tend to favour home-ownership because ‘privatism’ is well established in the wider social structure. In other societies where this is not so, ‘collectivism’ is more strongly present. Yet this tells us little more about why such differences exist (if indeed they do) than, for example,
references to ‘political and operational feasibility’. Also, as Ball (1982b) has commented:

Kemeny sees tenures as immutable in terms of their finance and their effects. Yet tenure is only an aspect of the social relations involved in forms of housing provision. Distinct types of finance, construction and land acquisition, for example, are found associated with different tenures and these combinations vary between countries. Moreover, the place of these tenure-related forms of provision within the wider social structure varies over time and also between countries. Surely, such developments and inter-country differences must be central to an analysis of the growth of specific tenures in different countries (p.293).

So Kemeny’s study seems to suffer from a rather incoherent theoretical perspective. But the ‘political economy’ of urbanization does involve the abandonment of some of the limitations of the approaches already discussed and seeks to provide explanations of urban development and policies which relate them to material interests and their political and ideological manifestations. In theory, at least this approach accepts the structural determination of inequality and involves the examination of the ways in which capitalist accumulation differentially structures market developments and policies according to specific national histories of class struggle, using concepts such as uneven development (occurring both nationally and internationally). The focus is on housing as a commodity and a basic means of reproduction — with the conflicts this gives rise to — and there is a rejection of the myth of the ‘benevolent state’. Such a perspective should be able to provide comparative analyses of housing policy which are more penetrating than most of those which have appeared so far and which do not ultimately resort to ‘explaining’ national differences in terms of unreal, abstract categories. But so far many of these new urban studies have shown a distressing tendency to fall into some of the traps which they have criticized others for failing to avoid. Just as a ‘logic of industrialism’ pervaded the pluralist/convergence approach, all too often a ‘logic of capitalism’ has pervaded this Marxist approach. A good deal of writing on the political economy of housing has been characterized by faults which are similar to those found in the conventional studies, namely the imposition of categories derived from a pre-conceived and abstract ‘theory’ on the data. Often there has been a resort to a form of radical functionalism which ‘proves’ — without the possibility of disproof — that the development of the housing market and of housing policies is only in the interest of capital, so denying the importance of a careful historically-based examination
of the varying ways in which the housing question has been ‘solved’ in different social formations.

To summarize, the current state of comparative housing research is not encouraging. Much of the literature is superficial, often it is simply inaccurate or misleading, and abstracts housing policy developments from their broader economic and political context, and even from the workings of the housing system as a whole. The more theoretically informed studies, which do make some attempts to explain national differences and similarities, suffer, to greater or lesser degree, from the limitations which accompany the more general sociological and social policy perspectives from which they derive. We have indicated that recent work on the political economy of housing, in principle if not very often yet in practice, aims to avoid some of the difficulties of the other approaches, but this is not to claim any automatic superiority for this perspective. In fact, it is worth noting that one of the most interesting and important analyses of the comparative development of social policy yet published is Rimlinger’s *Welfare Policy and Industrialization in Europe and the USA* (1971) — the work of a conventional economist. Rimlinger reveals more than other writers about the differential development of welfare policies, as well as their similarities, because he avoids the construction of *a priori* typologies and concepts in favour of a detailed and historically sensitive analysis of how economic development, together with the associated changes in the class structure, politics and dominant ideologies, structured these policies in different societies.

**Frameworks for future research**

We have devoted a considerable part of this paper to a criticism of existing work because we believe that this provides us with some important conclusions about how future comparative housing research should be constituted. If future studies are to be of much value to policy makers or to improving our understanding of the determinants of housing markets and policies and the significance of these in social development as a whole, they will have to be both more detailed and wider in scope. Housing policies cannot be understood without locating them in the working of the housing sector as a whole and the housing sector itself cannot be understood as something which develops according to a purely internal dynamic, in isolation from broader social developments and struggles. Nor can the state’s position and the scope for its activities be viewed as matters which are unconnected with these factors.

When considering the theoretical problems of comparative housing research, it is important to stress that structures of housing provision
In different countries there are different institutional frameworks of housing provision: for example, regarding social housing and mortgage finance institutions, the house-building industry and its sub-sectors, and land-ownership and the role of the state. But in order to understand structures of housing provision it is necessary to consider more than a descriptive and static account of institutional differences. It is necessary to examine the dynamic of the interrelations between the institutions and the social forces involved in the provision of housing. This involves a concern with historical development, as structures of housing provision change over time.

There is a strong link between these historical changes and general economic development (nationally and, increasingly, internationally) in the advanced capitalist countries. Moreover, there are obvious and direct linkages between the development of housing provision and factors such as the development of productivity and economic growth which, for example, influence the purchasing power of most households in relation to the costs of housing.

Housing production and distribution are dominated by motives of profit maximization. This is almost as true for social housing as it is for private housing because, although in the former case there is a non-profit landlord, private enterprise is responsible for building and (in most cases) financing this tenure. In the private sector, as with any other commodity, housing is provided on the basis of market criteria — ability to pay — rather than on the basis of need. So a study of the changing circumstances in which it is profitable to supply housing throws considerable light on many of the major changes which have occurred, for example the decline of private renting and the rise of owner occupation. Housing need is a key criterion for allocation in social housing, but this is structured in ways which have been strongly influenced by the interests of sections of capital, including those involved in its provision (see Harloe, 1981, pp.39-41). The restrictive and insensitive bureaucratic procedures governing the allocation and management of the stock are, in part, a consequence of this situation. In other words, it is not satisfactory simply to blame the state for the failings of social housing; it is more valuable to ask the question why the state has provided such housing in the way that it has. And this cannot be understood without a detailed analysis of the nature of its structure of provision and of political struggles over this.

The suggestion of a close relationship between particular structures of provision and the development of the capitalist economy is not meant to imply that the nature of housing provision is a simple, functional
consequence of the ‘needs of capital’. In general terms, it is rather more like the outcome of a temporary consensus between contending economic and political forces, including sectional capitalist and working class interests. Yet this is not a pluralist system in which the state acts as a neutral arbiter in the ‘public interest’. Instead, in this series of conflicts there is an unequal struggle in which capitalist interests tend to predominate.

State intervention in the housing market largely reflects the changing balance of power in the course of these struggles. For example, in varying degrees in different countries, the introduction of large-scale programmes for social rented housing after the Second World War can be shown to have been a direct consequence of the growth in influence of socialist parties and at the same time to have benefited construction capital in a period when private house-building was difficult and unprofitable. In some countries this period of the mass production of social housing can also be seen as a response to the threat of rising social tension, partially due to acute housing shortages, or to have been closely related to the modernization of the national economy (see Harloe, 1981, discussing this period for various countries). A key aspect of current housing policies is that the state, like any other agent involved in housing provision, has become an integral part of structures of housing provision. The need for subsidies to maintain social housing is an obvious example, but also it is clear that the abolition of tax relief subsidies for home owners would bring the owner-occupied housing market to a state of near collapse. State policies often involve contradictory developments — not because politicians are ignorant or ill-informed (not mainly anyway) — but because policies respond to contradictory imperatives. For example, the demands for a continuation (or even expansion) of the expensive and regressive tax subsidies for owner occupiers that are currently being heard in many countries (from owner occupiers, builders, housing finance institutions, etc.) conflict with demands from the private sector for sharp reductions in government expenditure and tax cuts. Such contradictions are often reflected in contradictory policies.

To summarize, the concept of the social relations of housing provision enables us to generate a series of hypotheses about what structures housing markets and policies. The international comparative method is especially useful in this context as it provides further insights into both the similarities and the differences between housing markets and policies in different countries. Because of the distinct institutional structures and social relations involved in housing provision in each country, this type of comparative research necessarily raises new questions about all
aspects of housing provision. It has to question in particular the rhetoric and ideology within which housing arrangements and problems are presented, including the mystifications of official statistics. Such an approach aims to penetrate beneath the surface forms of housing provision in order to understand the ways in which they are differentially constituted in each society. For example, superficially both France and Britain appear to be at roughly similar levels of development with respect to owner occupation (each having around 50 per cent of its housing stock in this tenure). In fact, on closer examination this is questionable as a substantial proportion of the owner-occupied sector in the former country consists of low-income, low-quality rural ownership — the legacy of an era which predated nineteenth-century urbanization and industrialization and not a part of the modern, organized capitalist housing market. Moreover, owner-occupied housing provision differs considerably between countries. For instance, in Britain the market has been increasingly catered for by speculative developers, but in France such bodies have only had a limited, and now declining, share of new building.

In most academic studies and political debates, many aspects of housing provision remain unquestioned; institutional structures especially are often taken for granted. For example, although council housing in Britain is often thought to be little different from social rented housing elsewhere, it is in fact an exceptional form of management of social housing in the European context. Its political weakness relative to the social rented tenures in other countries could well have to do with its direct relationship to local and central governmental politics. In other countries, non-profit housing agencies have greater autonomy and are represented by independent but politically active national organizations. This is not to say that one system is preferable to the other, but these facts raise interesting questions about the divergent political fortunes of social housing in different countries.

Another example where comparative analysis is of value is in the study of that very British phenomenon, the building societies. In recent years the societies have been in increasing competition with each other and with the banks, and have been pushing for legislative reforms to enable them to diversify out of mortgage lending. To analyse the possible consequences of these trends, comparisons with similar institutions in other countries, where such developments have already occurred (for example the USA), may throw light on current debate.

In suggesting a need for more interest to be taken in comparative research, we should like to stress that we are not suggesting that developments in one country can or should simply be transplanted to
another. But international comparisons can offer two principal advantages. The first, and maybe most important, is the new light they can cast on old housing problems. In this sense comparative analysis acts as an heuristic device, questioning old concepts and modes of thought. The second advantage of the comparative method is that some generalizations may be made about the broad factors which help to structure housing markets and policies. For example, the international economic crisis of the last decade — high rates of inflation followed by unemployment and economic stagnation — has posed certain common problems for housing markets and policies; the universally-felt need to reduce government expenditure, the persistence of high real interest rates and so on. At the same time, the approach that we have suggested can also begin to analyse the variation in how these broad problems are experienced in practice in each country (and why such variations exist). It does not attempt to ground explanations of change in some universal and abstract categories but in an understanding of how the specific social relations which determine housing provision in each country are affected by and respond to matters such as the need to cut expenditure and high interest rates. Rather than develop this account of our approach further, we now turn to consider some of the current national and international developments we have been studying in a little more detail, in order to give an indication of what may be some key issues for future research, and add some brief comments on the practical problems of such research.

CONTEMPORARY ISSUES AND PRACTICAL PROBLEMS OF COMPARATIVE RESEARCH

Most of the research which we have been discussing was carried out during a period of economic growth and shares a conception of housing policies formed by this fact. In the last twenty years or so, policies have increasingly involved reliance on an expanding private house-building sector, with state activity occurring in support of this expansion. But our recent work in Europe and the USA has suggested that, in the current period of economic decline, the prospects for a continued expansion of private building must be in question. The position varies from country to country. For example, in Denmark, the Netherlands and France, non-directly subsidized private housing output has declined continuously, while in Britain and the USA, despite a secular decline, there have been sharp fluctuations in housing output in the past few years, together with important reorganizations of the structures of provision. In Britain the growing dominance of the larger house-builders is particularly evident and major changes are beginning to occur in the mortgage market. In
the USA, changes have already occurred in the arrangements for housing finance ultimately leading to mortgage market ‘deregulation’.

Despite these national differences, there are some broad similarities and continuities in the housing policies of the various governments in these countries. The reliance on the private market is even more marked than in the past, with the growing desire to cut public expenditure resulting in heavy reductions in direct subsidies and pressure to reduce the social housing sector. Increasingly, governments are relying on a recovery of the private market as the sole means of providing new housing at a time when this market’s prospects are poor. This contradiction, between policy aims and market developments, results in a further paradox for, when both direct and indirect housing subsidies are taken into account, total public spending on housing is tending to rise. We can illustrate the point by referring to some of the countries in which we have been working. Thus in Denmark and the Netherlands the collapse of the private market has been so severe that, in order to sustain any level of new output, their governments have been forced to subsidize directly most units produced. In Britain, Germany, the Netherlands and the USA there have been growing pressures to sustain the private sector by the extension of various forms of indirect subsidies (tax reliefs). The debate about, and the struggle over, the division of housing costs between individual households and the state is at the centre of the current politics of housing in all these countries. These examples illustrate the divisions that can occur between, on the one hand, policy and, on the other, developments in the housing market, as well as between actual and desired patterns of public expenditure. Such contradictions are becoming more intense in a period of economic decline, with rising unemployment and falling real incomes, continued inflation in housing costs and reduced profitability in the house-building industry. The pressure to further reduce public expenditure will exacerbate these problems.

In this and the previous section we have tried, very briefly, to outline some of the major trends which we believe should provide the focus for future comparative housing research. But, as we have noted, such research has to be sensitive to the fact that the different forms which the housing crisis takes in each country relate to the specific nature of each national housing market. Matters such as the structure of the circuits of housing finance and their relations to the capital market and the state, the composition of building industries, the different forms of social housing institutions, systems of land-use planning, patterns of land ownership, forms of state subsidy and regulations, and so on, have long
histories which have been formed within the specific class structures and economic, political and ideological contexts in each country. At the same time, each set of arrangements for housing provision has its own logic and politics and hence a degree of autonomous development. So comparative housing research needs both to grasp and account for the generality of the common problems which seem to face capitalist housing in many countries as well as to analyse the differing ways in which these problems are expressed and in which their resolution is attempted.

It is, of course, relatively easy to arrive at such a conclusion on paper. It is far more difficult to design and execute research which is adequate to the task at hand. Some recent research on British housing has abandoned many of the limitations of earlier approaches and has begun to explore these wider determinants of housing provision (see, for example, Ball, 1983). But the replication of such wide-ranging and detailed research in several countries simultaneously may seem to place too heavy a demand on most research-funding bodies and require a small army of researchers to carry it out. Differences in language and the impossibility of any individual gaining sufficient knowledge of the history and workings of more than a very limited number of different housing systems makes some sort of collaborative effort almost inevitable. Yet some recent attempts to organize international collaborative projects have foundered; either because no single funding body has been prepared to finance a multi-country study, and when separate funding has been obtained the somewhat different concerns of the different bodies involved have made the preservation of a uniform research design and focus impossible, or because the researchers themselves have found it hard to agree on a common design and/or have found that the temporal and financial costs of the effort required to keep in touch and in step have imposed too heavy a burden.

In addition there are, of course, a range of problems concerning the availability and adequacy of data and other information on an internationally comparative basis. Although a few comparative studies have had the resources to carry out extensive primary data collection, particularly in present circumstances most comparative research is bound to rely to a considerable extent on already existing national studies and data. These are of variable quality and quantity. We have found in our own work, for example, that while the American, British and French work is well developed, the range of available material in the smaller countries such as the Netherlands and Denmark is severely limited. Moreover, as might be expected, data are often in forms which make them difficult to compare (as well as being in forms which may
make them less than adequate for the theoretical perspective of the researchers). This may be for relatively simple reasons: different countries carry out censuses and housing surveys in different years, use different definitions of what is to count as a room, unfitness, and so on. But sometimes these differences reflect significant variations in housing policies. For example, the distinction between private rented, social rented and owner-occupied housing — which is fairly clear in many Western European countries — makes far less sense when applied to West Germany where 'social subsidies' have been available for housing owned by 'social' landlords, private landlords and owner occupiers.

But in our experience these limitations on the availability and form of data and other information — while they create considerable difficulties — need not prevent the development of comparative housing studies which aim to account for the ways in which housing is provided in the capitalist economies and the involvement of the state in these processes. The organizational reforms referred to earlier might be partly resolved by the development of joint programmes such as that recently initiated by the British Economic and Social Research Council (ESRC) and its French counterpart (CNRS), especially if they could be expanded to cover more than two countries. It will be very interesting to see how successful the ESRC/CNRS initiative is, or whether some of the difficulties we have referred to occur even when the funding agencies are committed to collaborative research. 3

CONCLUSIONS
The main purpose of this article has been to argue that the theoretical base for many recent comparative housing studies has been inadequate. But we have already tried to indicate that this does not mean that cross-national studies are a worthless exercise. Clearly, there are broad similarities as well as considerable differences in the nature and evolution of housing policies and markets which are of academic interest and whose study can help to illuminate the problems and choices faced by those whose concerns are mainly national rather than international in scope. We have suggested that a potentially productive approach to comparative studies — in this case, of housing — is one based on two concepts. First, that there are distinctive national structures of housing provision. Second, that a dominant feature of the histories of such provision is their relationship to capitalism — so the commodity provision of housing and the changing economic and political conditions which determine this are of central importance. In considering capitalist development as a whole, we can distinguish cross-national features and
trends from more specific national characteristics, and examine the ways
in which more general trends are experienced in practice in each country.
The aim of such work should therefore not be to produce a theory of
housing which de-emphasizes national differences, concluding with
some rather abstract but unconvincing generalizations which leave
much of what actually needs to be explained as an unanalysed residuum.
Rather, the objective is to study how the broad forces of capitalist
development are transmitted differentially in each nation, the nature of
their impact on the social relations of housing provision and how the
specific relations of housing provision in turn respond to these forces.
We have suggested that this response should not be seen as a functional
adaptation but as involving conflicting and contradictory trends.

Despite the differences between the housing markets and policies of the
six advanced capitalist countries in which we are working, historically
there have been some broadly similar developments in each case. In
the nineteenth- and early twentieth-century conditions of capitalist
urbanization, earlier housing tenures were largely swept away, to be
replaced by the production and distribution of housing in the form of
a marketable commodity, by small-scale builders and landlords. In each
of these countries there have been periods when political and economic
conditions have combined to create the circumstances for the development
of housing whose allocation has been governed by non-market criteria.
In the years since the Second World War, the general development of
these societies and economies has been such as to foster the growth of
an alternative form of the housing commodity, owner-occupation. The
major changes currently occurring in the economic and political context
surrounding housing are now leading to a restructuring of housing
markets and policies. There are many common cross-national aspects
to these changes, although they may be experienced in distinctively
different ways. The current restructuring signifies more than a purely
temporary or local disturbance in the social relations of housing
provision which have existed in the post-war decades of economic
growth, full employment and the political consensus which accompanied
these conditions. The analysis of these changes and how various nations
attempt to respond to them should be the main task for future
comparative research in this field.

NOTES
1 Over the past five years we have been carrying out a programme of research into the long-term
development of housing markets and policies in Britain, France, West Germany, the Netherlands,
Denmark and the USA. Our recent work has been funded by the Leverhulme Trust.
2 The concept of structures of housing provision refers to both the forms, agents and institutions
involved in the provision of housing and the social relations that emerge between them (for a fuller discussion see Ball, 1983, p.70).

In our own comparative work we have used a form of organization which involves the use of consultants in each country who prepare a preliminary report (based on a detailed brief which we provide), follow-up interviews and visits, and the use of secondary, published sources which are available to us either in the countries themselves or through the international library lending system. In this way over a period of years we have established a network of collaborators and an increasingly detailed understanding of the housing system of the six countries in which we have been working — together, of course, with a growing mass of documentation. The cumulative investment, both in terms of research effort and in funds, has been considerable. But had it all had to be achieved within the time and money which would be likely to be allocated to a single project, we doubt whether any grant-giving body would have been prepared to fund us.

REFERENCES
M. Ball (1982a), 'Housing provision and the economic crisis', *Capital and Class*, 17, 66–77.