Since the end of the 1970s, interest in international comparative housing research has been growing in many industrialized countries. Actually, this approach is by no means new to the field (Schmidt 1989: 60). Indeed, a few international comparative studies had been published in the 1960s (by Wendt, 1963; and Donnison, 1967, among others). Yet almost two decades passed before studies of this type started to proliferate. Schmidt explains the gap by the divergent course of housing studies during the 1970s. At that time, housing research lost contact with theoretical and methodological developments in the social sciences. But the tide turned at the end of the 1970s; ever since, international comparative housing and building have appeared in quick succession. (Benchmark Studies include those by Kemeny, 1981; Donnison and Ungerson, 1982; Ambrose and Barlow, 1986; Hallet, 1977; Ball et al., 1988; Kroes et al., 1988; Lundqvist, 1988, 1990; Van Vliet, 1987, 1990; and Van Vliet and Van Weesep, 1990).

The reasons for this revival of international comparative research are diverse. Academics have an inherent interest in comparative work in general. The interest of politicians and policy makers reflects their more practical concerns. Increasingly, they need to understand how specific housing policy instruments are employed in different countries and what the effects of these instruments are. Furthermore, the great expansion of international cooperation between Western countries and the impending economic integration of Europe in 1992 have also fostered interest in international comparison. After all, it has not been ruled out that housing will be subject to a degree of policy harmonization, just like other areas of policy, in the new Europe.

Against this backdrop the OTB Research Institute for Policy Sciences and Technology of the Delft University of Technology has conducted a comparative investigation of the housing systems and their effects in a number of European countries. The research is sponsored by the Ministry of Housing, Physical Planning and Environment in the Netherlands. The main objective of this ongoing project is to deepen our understanding and expand our knowledge of

housing policy in seven West European countries: the Netherlands, Belgium, the Federal Republic of Germany (FRG), Denmark, England, France, and Sweden. The case of the Netherlands serves as a frame of reference. Together, these seven case studies provide a cross section of the different housing systems. And their comparison provides some insight into the functioning and the effects of the instruments that constitute these systems.

For the sake of comparison, it was decided to split the project up into several small-scale studies that could be carried out independently. The project was divided according to the dominant themes associated with the different approaches to comparative housing research: housing policy in general, administrative and legal aspects, housing finance, housing costs, tax legislation, housing needs, housing quality, land-use policy, and housing management. When the project is finished, work will start on setting up a permanent data bank, to be based on our findings. Meanwhile, preparations will be made to broaden the study to include other EC countries.

By splitting up the project, it is easier to draw up a plan for implementation. Accordingly, the research activities have been clustered in the following thematic modules:

a. explanatory model;
b. policy framework in each country (economic, demographic, administrative, and legal aspects; general housing policy; organization of the housing market);
c. financial instruments of housing policy;
d. housing costs;
e. tax system and owner-occupation;
f. housing needs;
g. housing management;
h. housing quality;
i. land-use policy;
j. other EC countries;
k. information system (Euro-housing data bank).

There is, of course, a degree of interaction between these thematic studies. In discussing housing costs, for example, a link must be laid to module c, which looks at the financial instruments that form part of housing policy. A number of other themes should also be linked. Then, at the end of the project, the similarities and differences between housing systems in the seven countries will be analyzed. On the basis of the knowledge thus gained, an explanation will be offered for these features. This particular project started in 1992 by Van der Heijden.

This special issue of the Journal presents the results of the first five modules of the project outlined above. These results are complemented by findings from an OTB study on international comparison of urban renewal policy.

In the opening article, Boelhouwer and Van der Heijden (p. 371) summarize the various methods and approaches employed in international comparative
housing research. The differences between the approaches are not insurmountable, while all of the methods contain features that may be of value to the others. In addition, the approaches do not purport to offer a universal explanatory model. Rather, they suggest methods and techniques that may provide insight into housing-market processes. Only more general theories could provide an explanation of these developments.

All the different approaches recognize the importance of factors outside the sphere of housing. Therefore, in the second contribution, Boelhouwer and Van der Heijden (p. 383) discuss a number of factors exogenous to the housing market, such as demographic change and socio-economic characteristics. They then go on to consider housing construction and building policy in the seven countries. However, the main thrust of their article concerns the differences and similarities between the seven countries in regard to the objectives of the national housing policies. The authors argue that the housing policies of governments both right of center and left of center do not correlate strongly with their ideological stance. The conditions that prevail within countries -- the housing traditions, the structure and characteristics of the housing market, and electoral procedures, for example -- are much more important than ideology in determining the objectives of housing policy and the measures to implement it. In particular, housing traditions and the institutional structure of the housing market play a key role in this respect. Furthermore, the housing market is affected by market conditions and factors outside government control. The authors conclude that housing policy cannot be understood simply in terms of policy objectives. In practice, policy is the result of a complicated interaction; ultimately, policy represents a compromise between market forces and government interests. It is clear that market forces are a significant factor in determining the pattern of housing policy. But it is also evident that there is some scope for the pursuit of purely political objectives.

The third article, written by Boelhouwer (p. 405), complements its predecessor by focusing on the instruments that have actually been used to carry out housing policy. These instruments are described from a financial perspective, for which the author relies on Papa's study of the financial instruments applied in European housing. The seven West European countries showed numerous similarities and differences, particularly in the manner and degree to which the government intervenes in housing by implementing financial instruments. In some cases, these variations are based on the same policy standpoints. In other cases, traditional views on the role of government with reference to (sub-sectors of) housing are also influential. It should be kept in mind that the period covered by this study (1980-1990) is one of transition. That decade marks a shift to a set of housing instruments by which individuals are given income-dependent government support. This development is already evident in some of the countries investigated. Several other countries intend to take a similar course in the 1990s. As European integration proceeds, this trend may accelerate. The second part of the contribution concerns the degree to which a relation exists between the policy being pursued and the specific level of subsidies being
granted. Boelhouwer concludes that the policy formulated over the past decade is clearly manifest in government expenditure for housing, while policies that are actually implemented influence real developments on the housing market.

Of course, the implemented housing policy and the subsidies of the past decades have had an impact on the housing expenses of tenants and owner-occupiers in the seven countries. Haffner and Menkveld (p. 421) point out that the gross rents in the Netherlands are at an average level, despite the financial emphasis on object subsidies. On average, rent subsidy yields relatively less benefit in the Netherlands than elsewhere. Therefore, the differences in net rent level between households with different incomes are smaller than elsewhere. This makes the differences in net rent quotes for the various income groups larger and leads to high net rent quotes among low-income groups. Because of the fiscal regulations, owner-occupiers in the Netherlands and Denmark are in a more favorable position. In these two countries, households with a mortgage are allowed to deduct interest payments and can thereby reduce expenses by a minimum of 25 percent. Whereas deduction of interest payments is unlimited in the Netherlands, most other countries place restrictions on this tax concession. In those countries, higher-income households thus make relatively less use of this opportunity. For new construction and households with few children, the effect of the annual contribution in the Netherlands should not be underestimated. But Belgium, France, and (West) Germany have been able to make greater reductions than the Netherlands in the initial gross financing expenses for households with three (or more) children.

In the second article, it is argued that European housing policy has gone through roughly four stages since the Second World War. The second stage, was concerned with the quality of housing. In many countries, that stage marked a shift from new construction to the improvement and maintenance of existing buildings. The housing stock was improved by slum clearance or renovation of substandard dwellings. With this background in mind, the last contribution, written by Priemus and Metselaar (p. 447), reviews the salient results of an international comparison of urban renewal policy. The authors found that in many countries, urban renewal started as a policy of clearance and demolition. Later, particularly after the 1973 oil crisis, there was growing concern about preservation and repair. The Dutch were the only ones to promote 'building for the neighborhood'. In many countries, the original occupants have been displaced by urban renewal. An integrated approach to urban renewal often comes from the cities themselves. However, an integrated approach is generally absent at the national level. The integrated policy ambitions of the Dutch central government are virtually unique in Europe. At present, there is a distinct trend among the largest European countries to separate urban renewal policy from housing policy.

As mentioned above, the aim of this ongoing research project is to gain deeper insight into how the different housing systems in Europe function. We hope that the results presented in this special issue - that is, the outcomes of the first five
studies that were conducted up to 1993 - represent a step in that direction. At a later stage, Van der Heijden will make a comprehensive analysis of the differences and similarities between the housing systems in the seven countries. But at this point in the project, scientific approaches and theories play an important role. An analysis of the approaches and their explanatory power will form the basis of an integrated framework. And it is only within such a framework that the diverse systems become amenable to comparison. The results of this study draw attention to the options for development of the housing systems in the countries studied here. In a comparative mode, the main issue is whether the systems will converge or diverge in the future under the influence of the European economic and monetary union.

Note

1 Funding for this project has been provided by the Ministry of Housing, Physical Planning and Environment in the Netherlands.

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