

Housing policy in western countries: Toward broader social responsibility

NAOMI CARMON

*Faculty of Architecture and Town Planning
Technion-Israel Institute of Technology*

Summary

A survey of housing policies in Great Britain, the United States and a few European countries disclosed four common stages in their development. All of them went from minimal governmental intervention in the housing market to comprehensive involvement, and from sporadic philanthropy for the poor and sick to an inclusive policy committed to narrowing the social gap between the advantaged and the disadvantaged groups. An explanation is given for the similarities between the countries, and an hypothesis is suggested regarding future development.

The industrial revolution pulled millions of people to the cities, where they were crowded into slums. The pitiful housing conditions for these masses of laborers and their families, and the epidemics that broke out in the poor neighborhoods and endangered the populations of the entire cities, turned the housing issue from a private problem into a public dilemma.

This paper surveys the ways in which western governments have tackled the housing issue. First, we trace the histories of housing in Great Britain and the U.S.A.; in spite of differences in philosophies and procedures, the two countries seem to have gone through four similar stages. Next, we point to similar processes in other western countries. Finally, we try to explain this similarity and put forward a hypothesis about future developments.

Britain

Britain has a longstanding tradition of trying to overcome the problems of poverty and destitution. As in most countries, the first steps in Britain were taken by the Church – which considered charity and care for the poor and sick to be one of the most effective means for saving souls.

In 1531, Henry VIII authorized the first law that acknowledged public responsibility for those unable to provide for themselves. In 1601, Queen Elizabeth I issued England's famous Poor Law, which set the pattern of public support for the poor for the next 300 years. This law determined eligibility for public aid, required people who were able to work to do so, and guaranteed a minimum level of subsistence for those whose disablement prevented them from working. The law did not mention housing (except for homes for the aged, invalids and children); its significance lies in the state's acceptance of responsibility for the well-being of all its citizens.

Over the centuries, the Poor Law underwent numerous changes – none of which succeeded in surmounting the tremendous social problems caused by the accelerated migration to the cities. The population of London, Liverpool, Manchester, Birmingham, Sheffield and other cities increased 5 to 10 times within a few decades. The need for reform in government policy became salient.

Public interest in the question of housing was increased by the writings of John Stewart Mill, Thomas Carlyle, John Ruskin and Charles Dickens. By the turn of the nineteenth century, several quasi-social studies of the problem of poverty had been published – particularly about the poor workers in the new industries that had sprung up around London. The most important of these studies was administered by Charles Booth, a businessman who had hired (at his own expense) a staff of interviewers to investigate the housing and working conditions of thousands of working families in 1886. The widely published results defined one-third of London's population as 'poor'. The research contradicted the theory that the poor were the cause of their own poverty, and called for public action to improve housing, health conditions and wage levels (Friedlander, 1968).

These publications and studies did not fail to impress the public and several Members of Parliament, and aided the ascent of the philanthropic movement of Christian Socialists who fought the inhuman housing conditions. In 1864, a prominent activist, Octavia Hill, founded a firm for the construction and rental of sanitary housing for low-income workers. Its rent collectors were

women volunteers who, as they called on poor families, gave the housewives advice about efficient housekeeping. The activities hoped to raise the self-respect of the poor families and to influence the education of the children, guiding them into better occupations that would make them self-sufficient (Bremer, 1965; Owen, 1964).

Meanwhile, legislation made some progress. The first parliamentary law in Britain to deal with housing conditions was the Shaftsbury Law of 1851, which enabled municipalities to use public funds to build houses for the working population. The second important step was the Torrens Law of 1861, which dealt with the demolition and renovation of dilapidated housing. In 1875, legislation laid down the first minimum standards for buildings, sites, ventilation and sewage (Barnes, 1923, ch. IV).

In 1884, the growing outcry for housing reform led to the formation of a royal commission for housing matters. Many of its recommendations were incorporated in the housing law of 1890, which authorized municipalities to provide building plots for working class housing.

These were the main events of the first stage of Britain's housing policy, the stage of the organized philanthropy. The philanthropists emphasized the humanitarian goals of their action, but also made use of pragmatic arguments concerning public health. The brunt of the fund raising for their activities was borne by the philanthropists themselves: the legislation of those days simply permitted local municipalities to help their poor neighborhoods, but did not supply them with the necessary funds (Dyos, 1968). For that reason, very few slum dwellers actually benefitted from this stage. Even so, there is no denying its importance in raising public awareness of the need for government investment in family housing projects. And, since Great Britain held an influential position in the world and had many overseas dominions which learned the principles of modern government from her, the significance of the British example was substantial.¹

The second stage in Britain's housing policy started after World War I.² The nation was short more than 600,000 housing units — because about 850,000 new households had been established between 1911 and 1919, while only 238,000 new housing units had been made available. This estimate did not include the urgently needed replacement of housing in bad state of re-

Overnight, housing became a political issue. The government prepared for greater responsibility; its postwar slogan was 'Homes fit for Heroes'. There was a sharp shift from a housing policy that merely encouraged philanthropy

to one that actually involved the government in the construction of hundreds of thousands of new units.

The Housing and Town Planning Act of 1919 forced municipalities to determine and provide the housing needs of the working classes. The rents were fixed independently of costs; the government promised to cover the difference between the rents and the real costs. However, this generous subsidy policy did not survive long in its original form; the policy burdened the Treasury with an outlay that started at £20,500 in 1919/20 and rose to a record £8 million in 1924/25. First, it was decided to reduce the subsidies; later to cancel them. But subsidies were restored towards the end of the twenties, although not in their original far-reaching form.

The British government continued to play an important role in the housing market throughout the thirties, but government construction dropped from about 50% of all housing constructed in 1928 to less than 30% near the outbreak of World War II. At this point about 40% of the expanding private sector's new housing units were earmarked for low-income families; many voices (mainly from the ranks of the Conservative Party) called on the government to further reduce its share of housing construction.

In the wake of World War II, the third stage of Britain's housing policy began with a governmental decision to supervise the entire building industry.³ According to government estimates in 1943, 1,500,000 new houses were required in order to provide each family with a separate dwelling. The concern of the government was expressed by the Minister of Housing when he brought the first post-war Housing Bill before the House in March 1945: '... Housing should be tackled as one would tackle a military operation Let there be no misunderstanding; it is the intention of His Majesty's Government to go into business both in the manufacture and in the distribution of building components in a big way' (Donnison, 1967: 164).

The new policy meant close supervision of all building projects; this supervision was more encompassing than anything known before in the west. It involved the nationalization of development rights, so that a permit was required for all new construction and for practically all repairs and renovation projects; a checking system on building materials and their allocation only to essential projects; the allocation of four-fifths of all building funds to the construction of public housing; the freezing of rents of unfurnished apartments at pre-war price levels; occupancy agreements between landlords and tenants; and the continuation of confiscation agreements signed during the war, which permitted the confiscation of houses whose occupants were in

danger of being evicted. Many of these regulations were canceled by the mid-fifties, but a few entered the sixties.

A noteworthy event was the creation of the Ministry for Urban and Rural Planning with a commitment to benefit all strata of society. Its programs included the rebuilding of bombed urban areas; the planning of new cities (1946 Act) with balanced populations; and vast rehabilitation programs for old industrial slums, particularly in and around London. However, unlike in the areas of Health, Education and Social Security, no long-term comprehensive master plan for housing was drawn up. In spite of the near-total involvement of the government in all housing construction, the public role was still considered to be temporary.

By the mid-fifties, public projects sheltered 20% of Britain's households. After 2 million housing units had been built in 10 years, it looked as if the greater part of the shortage had passed — so that the government could substantially reduce its participation in the housing market. The percentage of private building rose from 10% in 1948 to 55% in 1959, and most of the speakers in Parliament favored its expansion over government building. In 1956, the housing subsidies for 'general needs' were canceled; public support was granted only for one-bedroom flats (mostly for the elderly) and flats in new towns and slums. The cancellation of rent controls began with the Rent Act of 1957.

Although government involvement in the housing market dwindled towards the end of the fifties, it became apparent at the beginning of the sixties that there could be no retreat. The revolution of rising expectations encompassed all levels of the British public, and the government could not shake off its responsibility to reduce the gaps in living standards between geographical regions and within them. A new policy was looked for to answer the new needs and the changing attitudes.

In 1960, Cullingworth issued an extensive longitudinal study which threw light on Britain's long-term housing-needs. It showed that from 1931 to 1951, the population of England and Wales had grown by 10% — but the number of households had increased 28%; households of one or two persons increased from 29% to 39% of the total, while those of six or more persons decreased from 16% to 8%. Since these demographic tendencies were increasing, and since a substantial share of the new households were low-income families, it became doubtful that the private market could meet the needs.

Another rather new factor was the perception of the widening discrepancy between the developed south and the underdeveloped northern regions of

England. Private enterprise was not eager to invest in the less-developed areas: consequently, the government itself had to supply enough jobs and good housing in the north⁴ to prevent the flight of professionals and skilled laborers and to lessen the pressure on the high-density areas of the South (Donnison, 1967: 176).

An important change occurred in the attitude toward urban renewal. It had been commonplace to consider this to be a one-time task of eliminating substandard housing. But the post-war experience showed that standards are not static; housing conditions that had been acceptable a few years ago were considered below standard. Accordingly, people realized that renewal and rehabilitation activities should expand rather than decline.

An even more significant change of attitudes took place in reference to housing for the lower classes. The sharp separation of the British classes⁵ was perpetuated by the traditional system of dispensing charity to the poor, which dated back to the Poor Law authorities of previous centuries. In the sixties and seventies, however, the means tests and its accompanying institutionalized stigma was attacked in favor of a universal system of social services. Although British society accepts income inequality among its citizens, many people do not accept inequality in the dispensing of basic social services. In the fields of education and health, administrative arrangements designed to foster equal opportunities have been in effect for more than a generation. In the field of housing, development has been much slower — but in the same direction: not merely to supply minimal standards which help disadvantaged groups survive, but to strive for a wide range of services on a universal basis.

As a response to these new needs and attitudes, the fourth stage of British housing policy focuses on the concept of housing as a social service.⁶ The sums of governmental investments in housing may differ in this stage according to various circumstances and ministers, but the general direction of the policy seems to be clear. The government has accepted the idea of permanent and comprehensive responsibility for housing, similar (in essence, not in operational details) to its responsibility for education and health.

United States

Interest in housing as a public issue in the U.S. arose only toward the end of the 19th century. What we call the first stage of organized philanthropy began with a few philanthropists who awoke the public conscience, brought some

relief to a small number of slumdwellers, and led the way to the first housing legislation.⁷

Jane Addams of Chicago and Lillian Wald of New York were the first to raise the issue of immigrants in slum neighborhoods. Detailed articles about New York slums by Danish-born journalist Jacob Riis contributed directly to the passing of the country's first building law in the State of New York in 1867; it set minimum standards for light, air, sanitation and safety in new houses. Similar legislation was passed in Illinois, Pennsylvania, Massachusetts, Ohio, California and other states immediately after World War I (Wood, 1931).

The first activity by Congress in the area of housing was allocation of \$20,000 to finance a housing survey of city slums in 1882. However, the findings did not stir Congress into action.

In 1916, after a committee had shown that private enterprise was unable to ensure sufficient housing for workers in the new war industry, the government began building several thousand housing units for essential workers. The project was carried out by the new Bureau of Industrial Housing and Transportation in the Department of Labor. After the war, almost all government housing was sold to private owners (Lewin, 1952).

In 1920, a Senate committee claimed that the housing shortage should be solved by private capital; it rejected the idea of direct state involvement. However, the committee also suggested that a department of housing be set up within the Federal Chamber of Commerce to establish a system of mortgage trusts. Although this was done, the functions of the system were limited.

During the twenties, several projects for low-income families were begun, mainly in New York. Most of them were constructed by private firms which sought to combine philanthropy with a certain measure of financial gain. There were a few attempts to copy the British system of Octavia Hill — who had set up a firm to rent very cheap houses to workers' families, hoping for a 5% return on the investment (Bremner, 1965; Cope, 1902). But these were only drops in the sea of housing needs. According to a government survey of 64 cities in 1929, 2.3% of all units were inhabitable; 15.6% were in a bad state of repair; and only 37.7% were in good condition. Many houses had no running water, toilets or proper heating facilities. The situation deteriorated further during the Depression, but the government refrained from effective intervention.

In 1925, approximately 100,000 new housing units were built; in 1933, at the bottom of the Depression, only 10,000. President Hoover's government put great effort into reviving the economy. This included stimulation of the

building industry, but only through incentives to private enterprise. The tradition of governmental non-interference was still holding, and was explicitly expressed in the conclusions of the special housing committee established by Hoover in 1932:

The Committee has taken into account the housing experience of European countries. Their governments have been forced to participate in low-cost housing . . . to a much greater degree than we hope will be necessary in the United State. This committee is firmly of the opinion that private initiative taken by private capital is essential, at the present time, for the successful planning and operation of large-scale projects. Still, if we do not accept this challenge, the alternative may have to be government housing. (Gries and Ford, 1932: 24).

This paragraph reflects the government's attitude in the first stage of housing policy in the U.S.

President Roosevelt created the New Deal that revolutionized the American economy and society. He opened a new stage in housing policy with the establishment of three organizations:

- (1) Home Owners Loan Corporation (HOLC). In the first three years of its existence, the organization lent three billion dollars to finance the mortgages of more than one million homeowners. Its main objective was to save banks from bankruptcy, but it also supported hundreds of thousands of small house buyers. The truly poor, who could not afford to buy houses, did not benefit.
- (2) Federal Housing Administration (FHA). The aim of this organization was to encourage industrial building; the government took investment risks that had hitherto been borne by private entrepreneurs. During the thirties, the FHA did not help the lower classes or even the lower middle classes; regulations encouraged mortgages only for relatively expensive housing, and did not benefit renters. (The regulations were changed after World War II.)
- (3) Public Works Administration (PWA). The main objective of the PWA was to fight unemployment. Subsidiary aims were to help provide decent housing for families with meager incomes beneath the range of private housing, and to rehabilitate slums by assisting in the construction of public housing. This was not a governmental effort to improve the lot of the needy classes, but was designed 'to demonstrate to private builders and planners the practicability of large-scale community planning' (quoted by Bellush and Hausknecht, 1967: 7).

This was the beginning of systematic government participation in the hous-

ing market in the U.S. However, it cannot be viewed as a major ideological breakthrough, but rather as the product of the pressures from a severe economic crisis. The mortgages and the public construction were designed primarily to help get the economy off the ground, rather than to demonstrate the government's recognition of its responsibility to provide appropriate housing for its citizens.

Basically, similar economic reasons lay behind the Emergency Relief and Construction Act of 1932 and the National Recovery Act of 1933. Likewise, the purpose of the National Housing Act of 1934 was 'to improve nation-wide housing standards, provide employment and stimulate industry; to improve conditions with respect to home mortgage financing; to prevent speculative excesses in new mortgage investment and to eliminate the necessity for costly second mortgage financing by creating a system of mutual mortgage insurance' (Bloomberg, 1951: 591). The Housing Act of 1937 dealt with administrative procedures for urban renewal: its major aim was to reduce unemployment by engaging workers in slum clearance and public housing construction.

During World War II and in the years following, there was a serious shortage of housing units. In his State of the Union message to Congress in January 1949, President Truman declared that 'Five million families are still living in slums and firetraps', and 'three million families share their homes with others' (quoted by Bellush and Hausknecht, 1967: 11).

Although the seriousness of the situation was well known, the Housing Act of 1949 met with strong opposition. Compared to the Act of 1937, it made few practical changes. However, it can be considered the beginning of a new stage in U.S. housing policy — the third stage — since it declared government's intention to ensure adequate housing for every citizen. This principle was formulated as follows:

The Congress hereby declares that the general welfare and security of the Nation and the health and living standards of its people require housing production and related community development sufficient to remedy the serious housing shortage, the elimination of substandard and other inadequate housing through the clearance of slums and blighted areas, and the realization as soon as feasible of the goal of a decent home and a suitable living environment for every American family, thus contributing to the development and redevelopment of communities and the advancement of the growth, wealth and security of the nation. (Greer, 1965: 4).

Such a declaration would not have passed in those years if the practical aspects of the Act had not been useful to the advocates of private enterprise. The act suggested federal aid for slum clearance projects that did not necessarily include housing for the evacuated; the cleared areas could be used for luxury houses, for commercial or industrial purposes, for public parks and so on — on the condition that the developer provide the evacuated residents with 'decent, safe and sanitary dwellings within their means anywhere in the locality within convenient distance of their place of employment' (Raymond, 1965). However, what went on in the name of urban renewal certainly did not fit these conditions. The federal legislation was flexible, allowing each municipality to make its own decisions — and the local decision-makers did not represent the slum dwellers. Consequently, programs were directed to serve variety of interests, but more often than not ignored the plight of the evacuees altogether (Gans, 1965; Meyerson and Banfield, 1955). Most of the evacuees were relocated in other poor neighborhoods where the growing demand for housing raised the rents; relatively few were settled in public housing projects.

The public housing projects for low-income families were severely criticized on several grounds: (1) social isolation of the poor — especially blacks; (2) ugly and non-functional architecture; (3) high cost; (4) expensive and sloppy maintenance; and (5) the discipline imposed on the occupants (Ledbetter, 1967; Rainwater, 1967).

Charles Abrams (1965: 236) described U.S. housing policy after World War II as 'socialism for the rich and private enterprise for the poor'. The former meant generous government assistance in obtaining loans and cheap mortgages to buy houses, especially in the suburbs. The latter meant speculation by private businessmen in slum clearance projects at the expense of the politically powerless evacuees. It is true that 700,000 dwelling units were built in public housing projects from 1937 to 1967, and the Federal Housing Administration supported 235,000 low-income families. But if we compare this to the 9 million families who received support from the same federal authorities, and the 28 million comfortably situated families who received loans for improving their housing conditions (Kahn, 1969: 167) — then obviously, in spite of the high-sounding proclamations about aid for the needy, the main beneficiaries of government action for housing were the middle classes.

In the sixties, there was a significant change in the social policy of the U.S. Government. The liberal intellectuals whom President Kennedy gave powerful positions in the federal agencies are said to be the main factor behind the new

spirit of greater public responsibility for the plight of individual citizens, particularly from disadvantaged groups.

Thousands of articles pictured the suffering of the poor amid America's affluent society, and called for drastic changes in social policy. Proof of the old system's failure were the riots among blacks, culminating in the long, hot summers of 1967 and 1968. The National Advisory Commission on Civil Disorder described 'two societies within one America', created by the growing segregation of disadvantaged blacks in the ghettos of the big cities (Kerner Commission, 1968).

In this atmosphere of urban crisis, the Department of Housing and Urban Development was created in 1965.⁸ President Johnson declared that by the end of the century, America would build as many urban homes as it had built since the beginning of the country; it was for the new HUD department to seize this opportunity for social renewal in the true and profound meaning of the word.⁹

The first tool used by HUD to implement its policy was the Model Cities program (Demonstration Cities and Metropolitan Development Act, 1966). The program may be considered the start of a new phase in U.S. housing policy; it introduced two revolutionary innovations (Kahn, 1969: 176-193):

- (a) It defined the goal as an attempt to minimize inequality in housing.
 - (b) It accepted comprehensive planning as a means for reaching the goal.
- Narrowing the social gap was not just a new name for the old goal of improving housing conditions for the poor. The difference between the two concepts was significant. The old aim was to help the needy rise to some absolute minimum level — an attainable goal within the few years. But the new goal involved a perpetual responsibility to help the poor catch up with the ever-rising living standard of the majority of the population — something that could never be completely attained.

Comprehensive planning meant the coordination of building and rehabilitation with programs for health, education, employment, welfare, and crime reduction. Such comprehensive programs for attacking the causes of poverty were the primary requisite for receiving funds under the new law. Thus, housing policy was to become part of urban policy; specific housing activities had to fit within the general context of social planning.

The alteration of federal housing policy coincided with a change inside the planning profession: urban planning was in a 'state of transition from physical planning to an amalgam of social-economic-physical approaches' (Gans, 1970: 223). Melvin Webber stated that only some aspects of the city

as a complex social system were expressed by physical or locational arrangements (1963a: 235). 'The artifactual city holds meaning for its inhabitants only as it serves to open or close social and economic opportunities' (1963b: 238). In the mid-sixties, the social planning wing of the American Institute of Planners began to broaden the scope of its social policy stances. Its goals were to open opportunities, promote social mobility, facilitate racial integration, improve intergroup relations, assure maximum feasible participation of the disadvantaged in the major social institutions, and facilitate the development of indigenous institutions and facilities under local control by black ghetto residents (Kahn, 1969: 175).

Governmental agencies were trying to help achieve these goals, particularly by aiming subsidized programs at various disadvantaged groups (mainly non-white). The percentage of federally subsidized starts rose from 2.7% of all housing starts in 1961 to 29.3% in 1970 (U.S. Dept. of HUD, 1973: 7); the budget for urban housing subsidies jumped from 900 million dollars in 1968 to 1.9 billion in 1972, in addition to 1.5 billion in loans to low-income families in rural areas (Schultze et al., 1971: 276-278).

The ambitious Housing Act of 1968 called for the construction or rehabilitation of 25 million housing units — of which one-fourth would be government-subsidized for families of low and moderate means. But the hitch was that the program was destined by its planners to solve once and for all the problem of substandard housing — ignoring the proven fact that the standard is constantly rising, so there will always be a need to care for people who cannot attain it. As Oscar Sutermeister said, 'The bill promised the elimination of substandard housing in the U.S. within the next decade. If the old definition of substandard housing is used in attempting to achieve this promise, the results will be a mockery to the ghetto residents of the nation.' (Hartman, 1975: 15)

U.S. housing policy in the seventies fluctuates between the third and fourth stages. There are hard data regarding the increased share of public money in the housing market and some evidence of the government's preparedness to adopt a permanent commitment; but on the other hand there are pressures to leave more of the housing financing and construction in the hands of private enterprise, with the government restricting itself to a finite task of rehabilitation.

Conclusion: The evolution of housing policy in western countries

In spite of differences among the housing policies of western countries, we found common stages in their development. The four stages discussed here were identified in both Britain and the United States. Evidence gathered for other countries showed similar phenomena. Not every country has to go through every stage; some – especially those which started their modernization process late – may skip one or more of the first stages; in other countries, the characteristics of more than one stage may appear at the same time. Still, the similarities surpass the differences.

The first stage of public housing policy in England and the U.S. – as in Denmark (United Nations, 1956) and Sweden (Silk, 1948) – was initiated by wealthy philanthropists. They lobbied for laws against unsanitary buildings and unsupervised mass construction, and raised funds for constructing and rehabilitating housing for the poor. Although the number of projects was small, they had great significance in spreading the idea of public responsibility for the well-being of all citizens.

Crisis conditions forced the countries into the second stage in which the state first played an active role in the housing market. In Britain and Germany, it was the severe shortage of housing units after World War I; in the U.S. and Sweden, it was the economic crisis and skyrocketing unemployment; in Italy it was the outcry for agrarian reform. In several of these countries, the governments did penetrate deeply into the housing market – but not as part of a general effort to solve the nation's housing problems. There were merely reactions to pressures in regard to specific problems; intervention ended when the pressures eased.

The middle class benefited most from the state participation at this second stage. President Roosevelt's New Deal housing programs helped middle class home-buyers almost exclusively. Public housing built in England between the two World Wars was unattainable by the poor, in spite of being subsidized. The same was true of Germany in the 'Era of the Hauszinssteuer' (1924 to 1930), during which new housing construction increased threefold (Bauer, 1934: 237). Most of Sweden's urban housing subsidies in the thirties were given to private contractors who did not build for the poor (Johansson, 1938).

In the second stage, several important bills were passed for slum clearance and rehabilitation, and a substantial number of urban renewal projects were carried out. But the initiative usually came from urban planners striving for a

more effective and beautiful urban system; they ignored the plight of the evacuees.

Some south European countries, where industrialization and urbanization started late, still present the major characteristics of this stage in the sixties; great parts of the populations of Turkey, Greece, southern Italy, Spain and Portugal still live in conditions like those in England and America a hundred years ago. Nevertheless, the middle classes in these countries – demanded living conditions equal to those of the most developed countries – and, as a result were given government loans and mortgages. This is why the subsidized housing in Spain and Turkey was of a higher standard than in England – and there was little help for the disadvantaged classes who needed it most (United Nations Economic Commission for Europe, 1963; International Bank, 1963; Wendt and Carlson, 1963).

The third stage of the western countries' housing policy involves the government's total commitment to the housing of all citizens – with special effort for the weaker groups. Methods differ from country to country: the U.S. gives incentives to private enterprise, while in European countries most projects are carried out by the government. But in each country one finds the combination of diverse arrangements encouraging residential construction for the middle classes and a long list of programs adapted to the special needs of the lower classes. This combination is found in Sweden (Lundevall, 1957), Germany (Wendt, 1963), and Ireland (Pfretzschler, 1965), and also in Norway, Switzerland and Belgium (Donnison, 1967: 92-97).

Typical of the third stage are attempts to come up with a 'scientific' answer to the question: what are the minimum housing facilities for meeting the needs of a family's members and preserving their physical and mental health? It took many years to conclude that there is no one 'objective' answer: what had been considered adequate 50 years ago is now held to be inadequate; what meets the standards of one country may be far inferior to the standards of another. For example, the floor space taken as the lower limit to ensure mental health was set at 16 square meters per person on most European countries (Musil, 1962) – but double that (32.5) in the U.S. (American Public Health Association, 1950). In some countries the presence of running water, electricity and indoor sanitary facilities are enough to meet the accepted standards; on the other hand someone in the U.S. defined standard housing as including a telephone and an automobile as well (Cowhig and Beale, 1965: 56).¹⁰

Conviction is gaining that the answer to the question of minimum standards is subjective. George Orwell wrote that he once spoke to a miner and asked

him when the shortage of decent housing had gone worse in his area; the miner answered: 'When we were told about it' (Orwell, 1959: 65). People hear and see what happens around them, and their aspirations and expectations are raised accordingly. Hence, the better a situation is, the higher expectations rise – and the greater the demand becomes. This creates the paradox in which the flow of public funds to housing purposes grows as housing needs become less pressing.¹¹

In the mid-sixties the housing policies of a few western countries entered the fourth stage; the assumption that there is an absolute minimum of decent housing which the government can help people reach, and then can discontinue its intervention in the housing market, was shattered. Governments seemed to approve the notion of a relative standard, rising constantly with the rise in the general standard of living and with the increase of the awareness of equal opportunities – and therefore requiring deep involvement of the government for an unlimited period. As a consequence, national agencies concern themselves not only with adjusting and supplementing the free market, but also with setting the goals for all housing construction and creating the conditions for realizing these goals.

Thus we have seen that despite the variety of basic philosophies among the countries, especially between Britain and the U.S., there has been a growing similarity in western housing policies – mostly ideologically, and to some extent operationally as well. Our explanation of the similarity assumes that housing policy in democratic countries depends to a great extent on public opinion – which, in turn, is greatly influenced by mass communication and the relatively free stream of ideas inside these countries and among them. These lead politically conscious people towards similar concepts of social justice, which concentrate on narrowing the gap between different racial, ethnic and economic groups. The common stages of housing policy reflect the process of accepting this meaning of social justice against the background of the gradual acceptance by western countries of broader state responsibility for the well-being of all its citizens.

While other researchers see the present stage of deep government involvement in housing as a transient one (Donnison, 1967: 106), we hypothesize that it will outlive its opponents. Our hypothesis is based on the spread of the revolution of rising expectations of all groups and regions in each of the countries, and on the increased acceptance of its legitimacy by public representatives.

Final note

The paper was written before the policies of Prime Minister Thatcher in the United Kingdom and President Reagan in the U.S.A. could be analysed. Both of them try to decrease state intervention in the housing market. Does this mean that these countries are being drawn back from the above fourth stage to the third, or even to the second? If we were to speculate, the answer would be negative. It seems to us that the changes which they have introduced may be considered more as normal fluctuations around the major trend than a real deviation from it. The concept of housing as a social service (rather than a product) has become a common notion, and even conservative western governments accept the idea of government's deep and permanent involvement in the provision of social services, especially for the disadvantaged among their citizens. This deep involvement does not necessarily mean that the government should either build or maintain housing projects, but it does mean that the national authorities are permanently responsible for setting the ultimate goals of housing construction and of creating the conditions for realizing these goals.

Notes

1. For details about this British export, see Abrams (1964: 114-155).
2. The discussion of the second stage is based mainly on Bowley (1947) and Jarman (1948).
3. The discussion of the third stage is based mainly on Donnison (1967 and 1967a), and Wendt (1963a).
4. In 1971, Parliament promised public housing aid for developing regions. This cost the state £40-50 million in three years (Slack, 1972: 71).
5. An extreme and symbolic example of the situation was described by Collinson (1963), who found a two-meter wall topped by spikes - separating the social classes living on opposite sides of a street.
6. Wolman (1975: 20) states that this concept has already become ingrained in the United Kingdom.
7. Where not otherwise mentioned, the survey up to the forties is based on Bellush and Hausknecht (1967) and on Wendt (1963).
8. On its establishment and function, see Ink (1967).
9. From the President's address to the Congress - the first presidential address on urban problems (Fava, 1970: 5-6).
10. For examples of the steep rise in housing standards see Winneck (1965: p. 4) and a list of sources by Baer (1976: 361).

11. This paradox is not unique to housing; it also is present in other public services such as education, health and welfare.

References

- Abrams, C. (1965). *The city in the frontier*. New York: Harper and Row.
- (1966). *Man's struggle for shelter in an urbanizing World*. Cambridge, Mass: MIT Press.
- American Public Health Association, Committee of the Hygiene of Housing. (1950). *Planning the home for occupancy*. Chicago: Public Administration Service.
- Baer, W.C. (1976). The evolution of housing indicators and housing standards: Some lessons for the future. *Public Policy*, Vol. 24, No. 3: 361–393.
- Barnes, H. (1923). *Housing: the facts and the futures*. London: Ernest Benn, Ltd.
- Bauer, C. (1934). *Modern housing*. Cambridge, Mass: Riverside Press.
- Bellush, J. and Hausknecht, M. (1967). Urban renewal: a historical overview, in: Bellush, J. and Hausknecht, M., eds. (1967). *Urban renewal: people, politics and planning*. Garden City, New York: Anchor Books, Doubleday and Co.
- Bloomberg, L.N. (1951). The role of the federal government in urban housing. *American Economic Review*, Vol. 41: 586–598.
- Bowley, M. (1947). *Housing and the state: 1919–1944*. London: Allen and Unwin.
- Bremner, R.H. (1965). An iron sceptor twined with roses: Octavia Hill's system of housing management. *Social Service Review*, Vol. 39: 222–231.
- Collinson, P. (1963). *The Cutterlowe walls, a study in social class*. London: Faber and Faber.
- Cope, F.R. Jr. (1902). Tenement house reform: Its practical results in the 'Battle Row' district. *American Journal of Sociology*, Vol. 7: 331–358.
- Cowhig, J.D. and Beale, C.L. (1965). Levels of living among whites and non-whites. *Health, Education and Welfare Indicators*.
- Cullingworth, J.B. (1960). *Housing needs and planning policy*. London: Routledge and Kegan Paul.
- Donnison, D.V. (1967). *The government of housing*. Harmondsworth, Middlesex: Penguin Books.
- (1967a). Research and policy of housing: current developments in Britain. *Journal of the American Institute of Planners*, Vol. 33: 123–126.
- Dyos, H.J. (1968). The slum observed. *New Society*, Vol. II, No 279: 151–154.
- (1968). The slum attacked. *New Society*, Vol. II, No. 280: 192–196.
- Fava, S.F. (1970). *New towns in the U.S.: some sociological aspects of policies and prospects*. Manuscript.
- Friedlander, W.A. (1968). *Introduction to social welfare*. 3rd ed. Englewood, N.J.: Prentice Hall.
- Gans, H.J. (1965). The failure of urban renewal. *Commentary*, Vol. 39: 29–37.
- (1970). From urbanism to planning. *Journal of the American Institute of Planners*, Vol. 36, No. 4, 223–225.

- Greer, S.A. (1965). *Urban renewal and American cities*. Indianapolis: The Bobbs-Merrill Company.
- Gries, J.M and Ford, J., eds. (1932). *Final report on the committee on large-scale operations*. The President's conference on home building and home ownership. Washington D.C.
- Hartman, C.W. (1975). *Housing and social policy*. Englewood Cliffs, N.J.: Prentice Hall.
- Ink, D.A. (1967). HUD – The department of housing and urban development – a new federal department. *Law and Contemporary Problems*, Vol. 32, No. 3: 375–383.
- International Bank of Reconstruction and Development (1963). *Economic development of Spain*. John Hopkins Press.
- Jarmain, J.R. (1948). *Housing subsidies and rents*. London: Stevens and Sons, Ltd.
- Johansson, A. (1938). Social housing policy in Sweden. *Annals of the American Academy of Political and Social Science*, Vol. 198: 164–165.
- Kahn, A.J. (1969). *Studies in social policy and planning*. New York: Russel Sage Foundation.
- Kerner Commission (1968). *Report of the National Advisory Commission on civil disorders*. New York: Bantam Books.
- Ledbetter, W.H. (1967). Public Housing – a social experiment seeks acceptance. *Law and Contemporary Problems*, Vol. 32, No. 3: 490–527.
- Lewin, J. (1952). *Your congress and American housing: the actions of congress on housing from 1892–1951*. U.S. 82nd Cong., 2nd sess., H. Doc. 532.
- Lundevall, O. (1957). *Swedish housing market*. Stockholm: Hyresgasternas Förlags A B.
- Meyerson, M. and Banfield, E.C. (1955). *Politics, Planning and the Public Interest*. Glencoe, Ill: The Free Press.
- Musil, J. (1962). The sociological approach in planning workers housing: the experience of Czechoslovakia. *International Labor Review*, Vol. 86: 545–566.
- Orwell, G. (1959). *Road to Wigan Pier* (Uniform edition). London: Secker and Warburg.
- Owen, D. (1964). *English philanthropy 1669–1960*. Cambridge, Mass: Harvard University Press.
- Pfretzschger, P.A. (1965). *The dynamics of Irish housing*. Dublin: Institute of Public Administration.
- Rainwater, L. (1967). The lessons of Pruitt-Igoe. *The Public Interest*, No. 8: 116–126.
- Schultze, C.L., Fried, E.R., Rivlin, A.M. and Teeters, N.H. (1971). *Setting national priorities: the 1972 budget*. Washington, D.C.: The Brookings Institution.
- Silk, L. (1948). *Sweden plans for better housing*. Durhan: Duke University Press.
- Slack, K.M. (1972). Social administration digest. *Journal of Social Policy*, Vol. 1, No. 1: 60–78.
- United Nations, Dept. of Economic and Social Affairs (1956). Housing experience in Denmark and its possible application to Latin America, in: *Housing Through Non-Profit Organization*, New York.
- United Nations Economic Commission for Europe (1963). *Economic survey of Europe in 1962*. Geneva.
- U.S. Department of Housing and Urban Development (1973). *Housing in the seventies*. Washington, D.C.

- Webber, M. (1963a). Comprehensive planning and social responsibility: toward an AIP consensus on the profession's role and purpose. *Journal of the American Institute of Planners*, Vol. 29, No. 4: 230-241.
- (1963b). The prospects for policies planning, in: L.J. Dull and J. Powell, eds. (1963). *The urban condition*. New York: Basic Books.
- Wendt, P.F. (1963). *Housing policy – the search for solutions*. Berkeley: University of California Press.
- Wendt, P.F. and Carlson, E. (1963). Spain's housing policy. *Land Economics*, Vol. 39, No. 1: 55-80.
- Winnick, L. (1965). *Housing and urban development: the private foundation's role*. New York: The Ford Foundation.
- Wolman, H.L. (1975). *Housing and housing policy in the U.S. and the U.K.* Lexington, Mass: Lexington Books.