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## **The Rise and Fall of Social Housing?**

Housing Decommmodification in Long-Run Perspective

Konstantin A. Kholodilin, Sebastian Kohl, and Florian Müller



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#### **About the authors**

Konstantin A. Kholodilin is a senior researcher at the German Institute for Economic Research in Berlin and professor at the National Research University – Higher School of Economics in St. Petersburg.  
Email: kkhodilin@diw.de

Sebastian Kohl is a professor of sociology at the Freie Universität Berlin.  
Email: sebastian.kohl@fu-berlin.de

Florian Müller is a doctoral student in history at Zurich University.  
Email: florian.mueller@fsw.uzh.ch

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[info@mpifg.de](mailto:info@mpifg.de)

## Abstract

The comparative study of housing decommodification lags behind classical welfare state research, while housing research itself is rich in homeownership studies but lacks comparative accounts of private and social rentals due to missing comparative data. Building on existing works and various primary sources, this study presents a new collection of up to forty-eight countries' social housing shares in stock and new construction since the first housing laws around 1900. The interpolated benchmark time series generally describe the rise and fall of social housing across a residual, a socialist, and a Northern-European housing group. The decline was steeper than for the classical welfare state, but the degree of erosion was surprisingly small in some countries where public housing associations remained resilient. Within the broader housing welfare state, social housing correlates positively with rent regulation and allowances, but negatively with homeownership subsidies and liberal mortgage regulation. A multivariate analysis shows that social housing is rather explained by housing shortages and complementarities with rental and welfare policies than by typical welfare state theories (GDP, political parties). Generally, the paper shows that conventional housing typologies are difficult to defend over time and argues more generally for including housing decommodification in welfare state research.

**Keywords:** housing tenure, social housing, welfare state

## Zusammenfassung

Die vergleichende Forschung zur Dekommodifizierung des Gutes Wohnen ist bisher von der klassischen Wohlfahrtsstaatsforschung vernachlässigt worden. Die Wohnungsforschung selbst ist wiederum reich an Studien zum Wohneigentum, aber vergleichende Darstellungen zu privaten und sozialen Mietwohnungen sind aufgrund fehlender komparativer Daten wenig erforscht. Aufbauend auf bestehenden Arbeiten und verschiedenen Primärquellen stellt diese Studie daher zunächst eine neue Datensammlung von bis zu 48 Ländern vor, die den Anteil der Sozialwohnungen an den Beständen und Neubauten seit den ersten Wohnungsbaugesetzen um 1900 erfasst. Die interpolierten Benchmark-Zeitreihen beschreiben im Allgemeinen den Aufstieg und Fall des sozialen Wohnungsbaus in einem residualen, sozialistischen und einem nordeuropäischen Wohnungsregime. Der Rückgang war steiler als beim klassischen Wohlfahrtsstaat, aber überraschend resilient in Ländern mit öffentlichen Wohnungsbaugesellschaften. Innerhalb des umfassenderen Wohnungswohlfahrtsstaates korreliert der soziale Wohnungsbau positiv mit der Regulierung von Mieten und Wohngeldzahlungen, aber negativ mit Wohneigentumssubventionen und liberalen Hypothekenregelungen. Eine multivariate Analyse zeigt, dass der soziale Wohnungsbau eher durch Wohnungsknappheit und funktionale Komplementarität mit Miet- und Sozialpolitik als mit typischen wohlfahrtsstaatlichen Faktoren (BIP, politische Parteien) erklärt wird. Generell zeigt der Beitrag, dass herkömmliche Wohnungstypologien im Laufe der Zeit nur schwer zu verteidigen sind, und plädiert dafür, die Dekommodifizierung von Wohnraum stärker in die Wohlfahrtsstaatsforschung einzubeziehen.

**Schlagwörter:** Sozialwohnungsbau, Wohlfahrtsstaat, Wohneigentumsformen

**Contents**

1	Introduction	1
2	Social housing: What it is and how to measure it?	5
3	Descriptive results	8
4	Bivariate findings: Social housing and the broader housing welfare state	13
5	Multivariate: The determinants of social housing provision	17
6	Conclusion	20
	Appendix	22
	References	42

# The Rise and Fall of Social Housing? Housing Decommodification in Long-Run Perspective

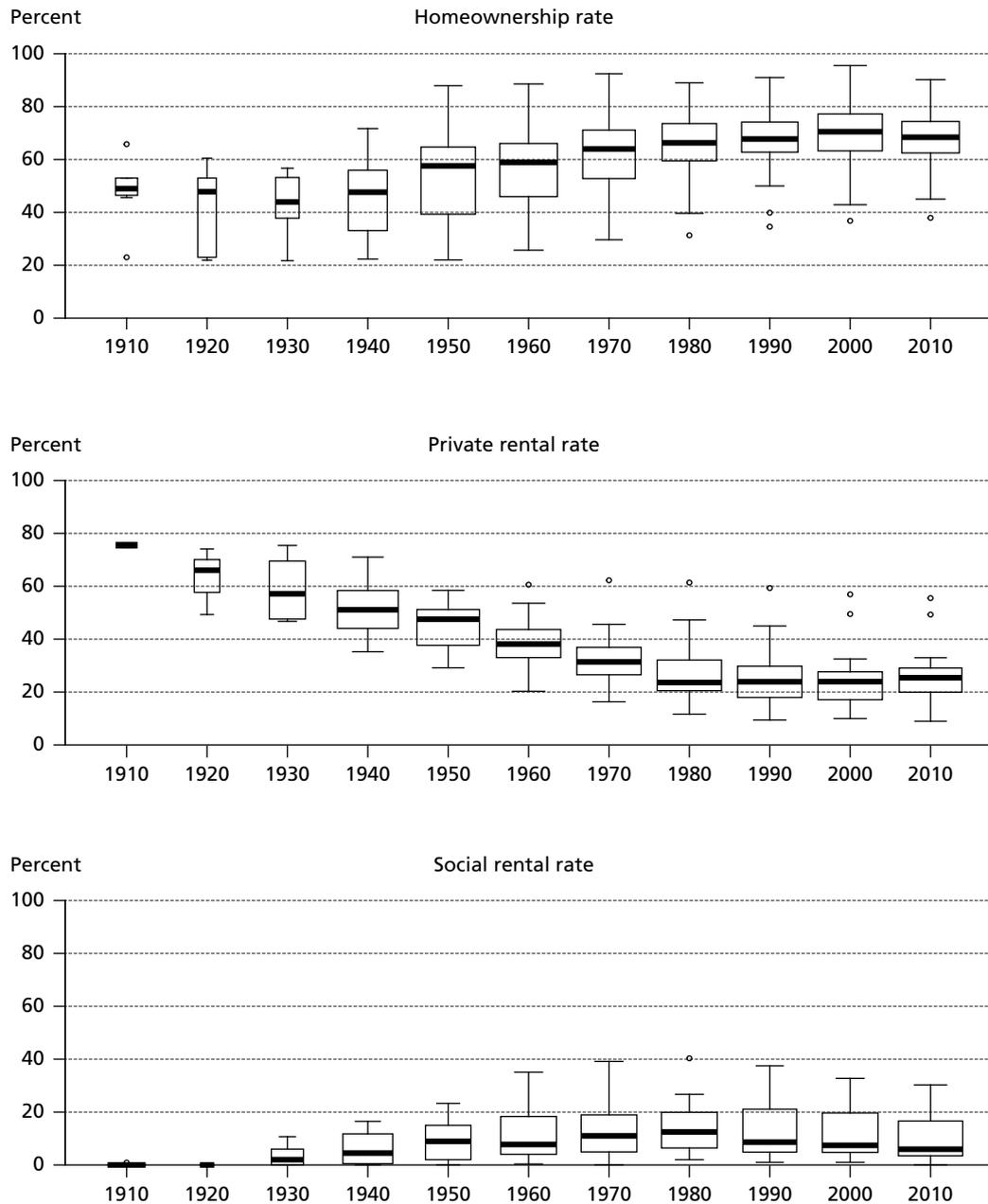
## 1 Introduction

Large cities in Western countries have seen a return of the housing question, as rents and house price surges have made urban housing more and more unaffordable (Le Galès and Pierson 2019). With many demand-side subsidies for homeowners only increasing mortgage debt and house prices and with the many undesirable side-effects of rent regulation, national and local governments have been reconsidering the old supply-side policy option of social housing, i.e., a publicly subsidized below-market-rent form of tenancy provided by non-profit associations, local authorities, and even private actors. Long thought a relic of the past, the ongoing housing affordability problems have put social housing back on the political agenda, as the era of homeownership-only policies subsided after the Global Financial Crisis 2008–2009. Yet, while social housing has been the subject of many individual-country studies, country-comparative research, let alone of longer historical time horizons, has largely been missing since the last global assessments of the 1980s/1990s. In comparison to the sophisticated comparative OECD studies of the social-insurance-based welfare state, the comparative study of the housing welfare state is still as wobbly a pillar as its object of study is in modern welfare states (Torgersen 1987).

The comparative history of housing tenures over the last long century has variously been described as one of almost uninterrupted homeownership expansion (Atterhög 2006; Doling 1997; Kohl 2017), at the expense of private rental markets (Harloe 1985), interrupted by the rise and fall of social housing (Harloe 1995). While benchmark time series data have allowed for at least a historical reconstruction of the homeownership trajectory, few comparative data have been available to describe the long-run development of the private and public rental housing stock, even though the majority of the population of the countries under study lived in rental arrangements until the 1970s (cf. Figure 1). Existing works usually refer to snapshots or describe singular country trajectories. Building on many of these prior contributions, this study sets out to fill this gap by presenting detailed historical data for national social housing stock shares since 1945 in forty-eight countries, social housing construction data mostly since the 1920s.

This unique historical-comparative data collection summarized in Figure 1 shows that the global trend is best described by a rise of social housing in the late 19th century, with strong advances in the two postwar periods, a peak around the 1970s, and decline ever since. All countries participated in this trend to various extents. Yet, while the Anglophone and Southern European countries never developed substantial social housing, the decline was steepest in socialist countries, with Northwestern European countries in between. Among these, social housing retrenchment is still very heteroge-

Figure 1 Evolution of the three major housing tenures



Sources: Social housing (cf. Figure 2); Homeownership: Kohl (2017) and own representation; private rental is calculated as residual of homeownership and social housing and may contain free-rent arrangements; unbalanced panel.

neous, ranging from strong resilience to almost complete disappearance. The construction history and urban-level social housing rates confirm this general national picture. In comparison to social insurances, retrenchment and recommodification was generally more pronounced in social housing. Figure 1 also reveals that social housing rose

for a long time in parallel with homeownership at the joint cost of private rentals but did not benefit from the post-2008 homeownership decline, which rather produced a comeback of private rather than social rentals.

Social housing itself, however, is only one component of the broader housing welfare state, which consists of budget-neutral tenancy and mortgage regulation and of budget-heavier rent allowances, fiscal exemptions, and homeownership subsidies. By combining the social housing database with the most comprehensive existing data describing these other housing welfare dimensions, we show that social housing correlates positively with rental regulation and housing allowances, but negatively with homeownership subsidies and liberal mortgage regulation. Housing regimes are divided over whether they support tenancy or mortgaged homeownership and have shifted towards the latter over time.

Our dynamic multivariate analysis seeks to understand the determinants of social housing. Contrary to conventional welfare state literature, we do not find strong effects of economic development or governments' left-right orientation, but rather see social housing driven by housing shortages and demographics as well as by complementarities with private-rent regulation and the general welfare state: countries regulating private rentals compensate the loss of private production through social housing and generous welfare states also afford larger social housing shares.

The paper first contributes to recent attempts to map the housing welfare state, whose quantitative assessment has been lagging behind the more traditional welfare state with its focus on the decommodification of labor. One simple reason for this is the absence of a comparable data view on the phenomenon. Although comparative analyses have produced extensive statistical data (in particular Balchin 2013; Ball, Harloe, and Martens 1988; Crook and Kemp 2014; Donner 2000; Haffner et al. 2009; Scanlon, Whitehead, and Arrigoitia 2014), a systematic collection and analysis of historical data has been lacking to date. The OECD housing affordability data have only recently provided a first comparative snapshot picture, while historical time series are still missing. We document the country-specific evolution of social housing and all sources used in the Appendix. The data themselves are visualized and shared through a website.<sup>1</sup>

Second, we challenge simple accounts that see housing working much as other welfare domains: social housing is much more associated with basic housing provision needs, a trade-off with the homeownership segment and complementarity with stricter private rental regulation than with explanatory factors from welfare state research. Finally, in the realm of housing policy, the paper also contributes to a rise in interest in this social form of housing tenure, which the recent trade-off between declines in homeownership and the rise of "generation rent" had slightly forgotten (Lund 2013). Comparative housing research started with making social housing *the* central feature for the so-called comprehensive housing regimes (Donnison 1967), where large parts of the population

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1 See: <https://dataverse.shinyapps.io/socialhousing/>.

were in principle eligible for social housing. Among the first researchers to develop a systematic approach to the comparative analysis of housing provision were Ball et al. (1988), who elaborated a typology of different housing provisions (Ball and Harloe 1992). Witnessing the attack on the postwar model, they developed a periodization in distinguishing two periods of mass social housing provision that occurred in many European countries after both world wars and which were conceptualized as temporarily interrupting the dominant residual model (Ball 1986; Harloe 1995; 1985; Harloe and Martens 1984). Kemeny (2005) has famously challenged their underlying assumption of universal trends. In his well-known critique of both particularistic and convergence approaches, he proposed his own divergence thesis consisting of typologies of housing systems. However, social housing provision was equally central to Kemeny's seminal typology: countries with dualist rental markets tended to residualize and stigmatize social housing contrary to integrated rental markets (Kemeny 1995).

Harloe's and Kemeny's distinctions between mass (unitary) and residual (dualist) social housing remain strongly influential and research continues to oscillate around the questions of whether to emphasize differences or similarities, convergence or divergence (Malpass 2014). However, the notion of social housing and its relation to the welfare state has undergone several rounds of reconceptualization in the last decades (Ball 2020; Poggio and Whitehead 2017; Priemus and Dieleman 2002; Stephens 2016; van der Heijden 2013). The predominant narrative has until very recently been one of an increasing erosion of social housing (in terms of tenure, funding, provision, etc.) and one in favor of owner occupation. Researchers have described the withdrawal of the state, financialization, and more market-oriented solutions since the 1970s and pointed to residualization and the emergence of new, more diverse forms of social housing, including forms of social homeownership and more hybrid patterns of financing, construction, and management (Czischke 2009; Harloe 1995; Mullins, Czischke, and van Bortel 2012; Ronald 2013; Tunstall 2021; Wainwright and Manville 2017). In this vein, Haffner et al. (2009) have argued that the boundaries between social and private housing have become increasingly blurred, as commercially oriented investors are increasingly involved in social housing and policy purposes aimed at wider objectives.

However, as the authors themselves reveal in their comparative analysis, a persistent gap between social and market rental housing seems nevertheless to remain. With regard to target groups, providers, policy instruments, and competition within and between the two sectors, a large divide has persisted – albeit with important country-specific variations (Haffner et al. 2009). This is equally echoed in recent research: the Global Financial Crisis with its decline in homeownership and a remarkable comeback of the private rental market accompanied by the emergence of a “generation rent” (Arundel and Doling 2017; Byrne 2020; Ronald and Kadi 2018) shed new light on housing issues and recent years have witnessed a growing interest in comparative analysis of both the private rental sector (Crook and Kemp 2014; Monk et al. 2012; Oxley et al. 2010) and social housing (Hege- dus, Lux, and Teller 2013; Whitehead 2017; Whitehead and Scanlon 2007). Although the share of social housing has declined in almost all Western countries, it has “proven to be

both flexible and robust” (Scanlon, Whitehead, and Arrigoitia 2014, 443) and “surprisingly resilient” (Blackwell and Bengtsson 2021) in many countries over the years.

The paper is organized as follows. In the next section, we present how we constructed our historical-comparative database of social housing. This requires a country- and time-consistent definition of what housing is and brief narratives of social housing development in every country. Together with detailed country reports in the Appendix, this section should also caution against demanding too much of the available data: the harmonization allows for broad cross-country and over-time comparisons through interpolated time series but not for point comparisons of decimal digits. Due to data availability we are also restricted to countries of the Global North, even though the descriptive inclusion of all former Soviet Republics, Eastern Europe, and some Asian countries makes it less centered on Western countries than OECD studies of social expenditure. We then present our main descriptive over-time and cross-country results for social housing stocks and construction flows and correlate social housing with other housing variables. In a multivariate section, we develop an empirical model to locate the explanatory determinants of social housing. In the discussion section, we situate social housing in the broader housing welfare state. The conclusion highlights the difficulty of typologizing housing regimes and makes a case for extending research on decommodified housing as part of general welfare state research.

## **2 Social housing: What it is and how to measure it?**

Every comparative study of shares of social housing has to begin with a proper definition of the object of investigation. Social housing is usually understood as being distinct from privately rented housing, on the one hand, and home ownership, on the other. Yet, while the term is well understood as a matter of common sense, a broadly accepted positive definition of social housing is lacking. Scholars rely generally on working definitions.

For our purposes, an applicable definition of social housing in comparative perspective has to meet three criteria: It needs to be 1) sufficiently narrow to adequately describe the individual social housing systems in each country, 2) broad enough to allow for international comparison, and 3) quantifiable by statistical data with consistency over time. Although the description of the welfare systems of housing is fairly manageable for individual countries, data constraints make comparisons challenging. As Scanlon et al. (2014, 3) have noted, it is “impossible to provide entirely consistent comparative figures for the stock of social housing, both because different countries define the tenure in different ways and because of the limitations of the data.” This applies even more to historical series, in which both differences between countries and intranational developments of individual countries/cities over time have to be considered.

Scholars tend to apply pragmatic definitions in order to take into account the very diverse forms of social housing provision. Following Hansson and Lundgren (2019), at least five criteria can be identified to characterize social housing systems: the target group, type of tenure, type of provider, subsidies, and public intervention. To begin with, rather than offering a narrow positive definition, we rather define social housing *ex negativo* by what it does not include.

*Target groups* are mostly defined as households that are in some kind of “need,” i.e., having problems accessing an appropriate dwelling (Haffner et al. 2009). Existing literature identifies low-income households in particular as belonging to this group. However, in many countries social housing was – especially in the postwar period – and still is aimed at the broad middle class in European countries. By understanding the population “in need” as a fluid group, defined in political processes, we do not find this narrow definition especially helpful.

*Type of tenure:* Historically, the majority of public housing was occupied by renters. However countries such as Ireland or Iceland have known forms of socialized homeownership in which access to housing for large portions of the population has been heavily subsidized (Norris 2016b; Sveinsson 2006). These units sometimes figure in overall construction statistics, but are very difficult to survey in the stock, let alone after decades have passed. Therefore, we exclude socialized homeownership from our narrower definition of social rentals, but refer to some of these programs in the discussion section.

*Type of provider:* Most social housing was and is owned by public authorities or by providers who voluntarily commit to legally or institutionally bounded rents permanently or temporarily to limited or non-profit levels. These include not only organizations such as housing associations or cooperatives, but also private providers, as exemplified by the case of Germany (see Appendix). We do, however, identify three other forms of affordable housing that we want to exclude from our data set. First, there exists a relatively broad rental sector of for-profit providers who offer housing below market rates for various reasons, e.g., by not adjusting rents to inflation or by demanding lower rents out of goodwill (voluntariness). We further consider market housing under a regime of rent control (coercion) as well as those eligible for rent allowances as being outside the social housing sector. We look at these instruments in more depth in the discussion.

*Subsidies and public intervention:* Numerous researchers have for very good reasons drawn attention to the close relationship between public intervention and subsidies, on the one hand, and social housing, on the other. We emphasize their great importance as well, but we do not believe that they are a prerequisite. Philanthropic or cooperative housing projects are preceded by government intervention and, as the example of Switzerland shows, non-profit housing cooperatives do sometimes build without public subsidies or through forms of non-governmental self-help.

To allow for a wide variety of public housing systems, we therefore propose the following broad definition of social housing that is less dependent on specific target groups or types of providers: Housing units characterized by rents that are 1) determined by social-political objectives 2) institutionally set 3) at a level below market-prices 4) for at least the medium term (and not just short-term housing poverty welfare). Regarding the measurement of the social housing stock, we largely follow previous research and simple data availability. In every country, we start by identifying the first housing law that established a separated market segment for social housing. From then on, we draw on the earliest population and housing censuses of the various countries, cities, and sometimes parastatal organizations as our most important data on the share of social housing. Almost all censuses start mentioning tenure status after World War II, while prior data hardly exist at the national level, at times on the city level only. The censuses often distinguish between rented and owner-occupied housing, but they generally do not present a distinct category of social housing. Following previous research literature, we rely mainly on the status of housing providers to quantify the share of social housing. However, in the countries of the USSR, for instance, the share is calculated in terms of square meters of the total surface area, whereas, in Germany, in terms of the share of subsidized dwellings. The reason lies in the country-specific statistical traditions, which reflect the respective housing welfare systems. Therefore, Table A2 in the Appendix presents the definitions on which the respective country surveys are based.<sup>2</sup>

Overall the data allow describing trends over time and larger differences between countries, but we do not interpret smaller differences due to a potential margin of error. As census data only provide for benchmark data points, we interpolate between them below for graphical visualization which can be justified by the very gradual nature with which new housing construction transforms overall housing stock. For the more recent years, we can additionally draw on household surveys in certain countries, whose tenure variable is often even more fine-grained than the general census. While Table A2 summarizes the country-specific definitions and sources used in every country, our detailed Appendix contains short country narratives providing an overview of the key aspects of the evolution of social housing in each country and the major historiographical works.

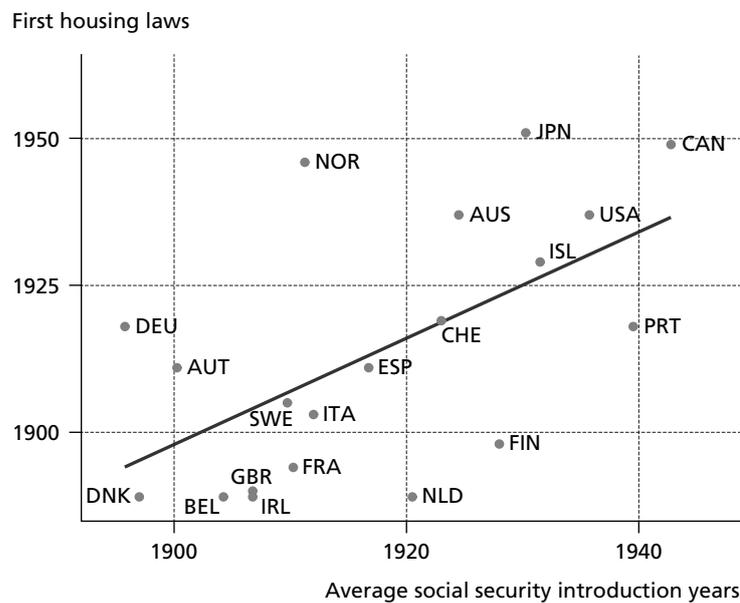
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2 For new construction, in turn, these data are sometimes not available. In such cases, we have to rely on subsidized housing as a proxy instead. This approach is not entirely satisfactory since market-rent housing has often been subsidized as well. However, since subsidies lead to an increase in supply and a moderation of prices, subsidies nevertheless seem to us to be a suitable indicator for measuring new construction activity in social housing.

### 3 Descriptive results

Early initiatives in favor of social housing had long been undertaken by employers as well as philanthropic and worker organizations in the context of urbanization, industrialization, and precarious housing conditions. Yet it was not until the late nineteenth century that first national housing laws were passed. These mostly comprised programs in favor of homeowners, while major cities nourished a parallel municipal (or philanthropic) housing stream (Bullock and Read 1985). Reform ideas and legislation circulated in a transnational exchange and policies in global capitals were often more similar than in cities within the same country (Rogers 1998). Progressive reform associations such as the Verein für Socialpolitik (Germany), Musée social (France), the Fabian Society (Great Britain), or the Instituto de reformas sociales (Spain) lobbied for housing laws as part of the general social reform packages meant to address the “social question” during the *fin de siècle*. Figure 2 shows how OECD countries passed their first national housing legislation more or less in line with the average social security laws, sometimes even before major social insurance legislation. As will be seen below, housing reform has seen an often parallel or complementary history with general welfare state reform.

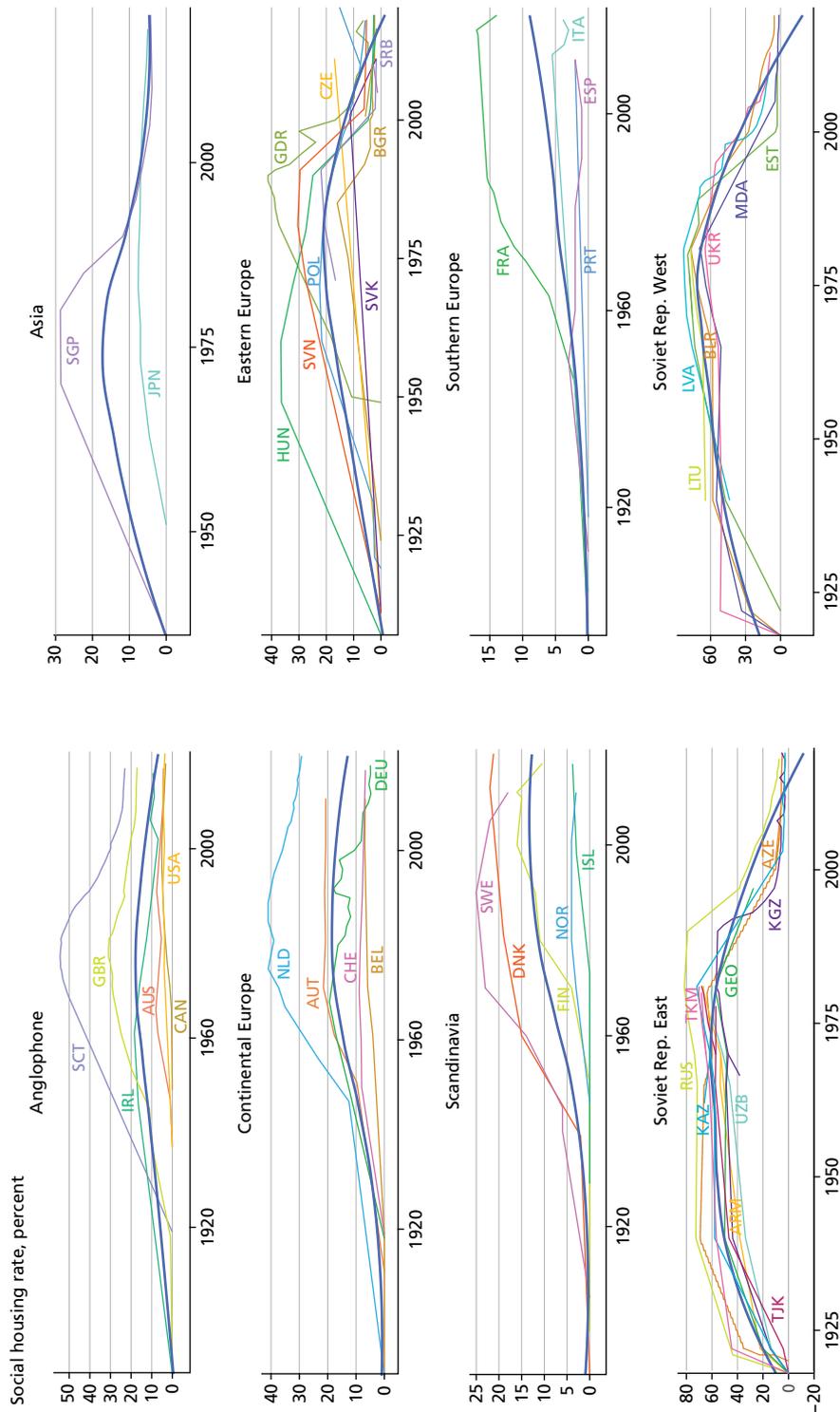
Figure 2 Average social security and social housing introduction years



Source: Schmitt et al. (2015).

Where the pre-WWI period knew social housing only as a marginal phenomenon, different country trajectories emerged after WWI as a geographical break-down of the social housing data shows in Figure 3: socialist countries started to expropriate most private (urban) housing stock following the Russian October Revolution in 1917 and reached the highest level of non-private housing overall, up to 60 to 80 percent within the urban stock. Most of this was achieved through conversion of the existing housing

Figure 3 Social housing shares in multiple countries over time



Armenia (ARM), Australia (AUS), Austria (AUT), Azerbaijan (AZE), Belarus (BLR), Belgium (BEL), Bulgaria (BGR), Canada (CAN), Cyprus (CYP), Czech Republic (CZE), Denmark (DNK), East Germany (GDR), Estonia (EST), Finland (FIN), France (FRA), Georgia (GEO), Germany (DEU), Hungary (HUN), Iceland (ISL), Ireland (IRL), Italy (ITA), Japan (JPN), Kazakhstan (KAZ), Kyrgyzstan (KGZ), Lithuania (LTU), Latvia (LVA), Moldova (MDA), Netherlands (NLD), Norway (NOR), Poland (POL), Portugal (PRT), Russia (RUS), Scotland (SCT), Serbia (SRB), Singapore (SGP), Slovakia (SVK), Slovenia (SVN), Spain (ESP), Sweden (SWE), Switzerland (CHE), Tajikistan (TJK), Turkmenistan (TKM), UK (GBR), Ukraine (UKR), USA (USA), Uzbekistan (UZB).

stock, whereas new construction still contained a non-marginal stream of private constructions, which the state had to rely on to focus on industrialization and arms production (Andrusz 1990; Smith 2010).

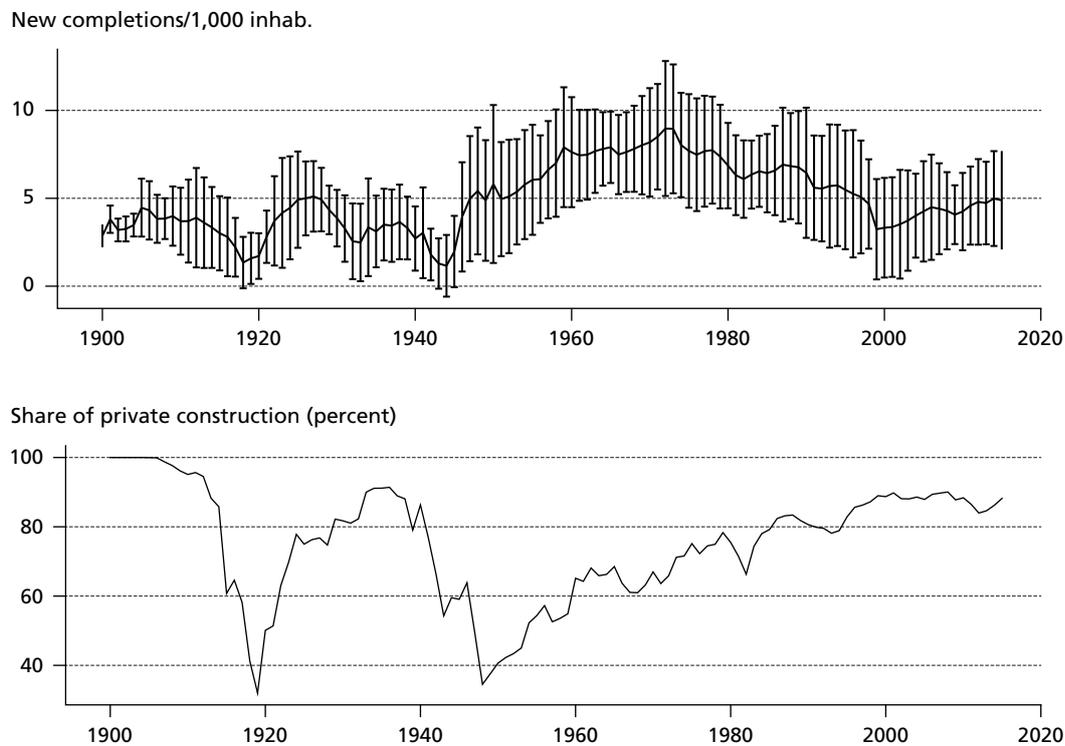
At the other extreme, there are Anglophone countries (except the UK) whose short-lived war housing moments during WWI did not spill over into more permanent housing policies before the Great Depression. In the USA, for instance, the war housing program of 1918 was deliberately curtailed to prevent a permanent housing program from emerging and the 1937 Wagner Housing Act was implemented with deliberate institutional breaks such as cost ceilings to prevent it from growing (McDonnell 1957), with Canada (Harris 2000) and Australia (Hayward 1996) following similar paths with comparable temporalities. England and Scotland are clear outliers in the Anglophone group, with council housing emerging from very early on as a non-residual form of housing.

On the lower end of either no or low social housing provision, there are also general economic and welfare laggards such as Asian, Southern, and Eastern European countries which did have early social housing laws in place but not the economic and state capacity to make them more than residual programs (cf. Allen et al. 2004). Whereas Spain (Correa 2003) and Italy (Piccinato 1988) followed the French-Belgian model of social homeownership, subsidies remained, for instance, almost completely non-existent in Greece (Leontidou 1992). France (Flamand 1989), while initially copying the Belgian housing model, is clearly different from the Mediterranean group it is sometimes classified into. Asian countries were similarly late in devising social housing legislation.

In between these groups at the extremes, there are North-Western European countries which all had strong government moments in the new provision of state-financed rental housing. New construction in countries like Denmark, Germany, the Netherlands, and Sweden was predominantly state-financed or supervised in some form, mainly because private capital markets had broken down (particularly in hyperinflation countries) and the war had created a large gap between interrupted supply and pent-up demand. While in some countries interventions were aimed predominantly at the rental sector, countries such as Belgium (Mougenot 1988) or Ireland (Norris 2016a) developed socialized homeownership systems. Some countries also saw this intervention as means to pacify the home front, “homes for heroes” (Swenarton 1981) and “Kriegerheimstätten” (Harlander 1995), facing revolutionary threats. This more conservative approach in public housing provision was also prolonged under some of the emerging European dictatorships, whose armament programs and war economy, however, prevented larger housing construction programs and even contradicted them (Bodenschatz, Sassi, and Guerra 2015).

This broad distinction into different country groups also holds for the post-WWII period, when social housing provision had its historical moment, reaching provision peaks almost everywhere, with socialist countries leading, North-Western Europe following, and Southern and Anglophone countries lagging. Eastern European countries were rather following their Western-European counterparts than carrying out strong Soviet-style

Figure 4 Building cycle and share of private housing in new construction

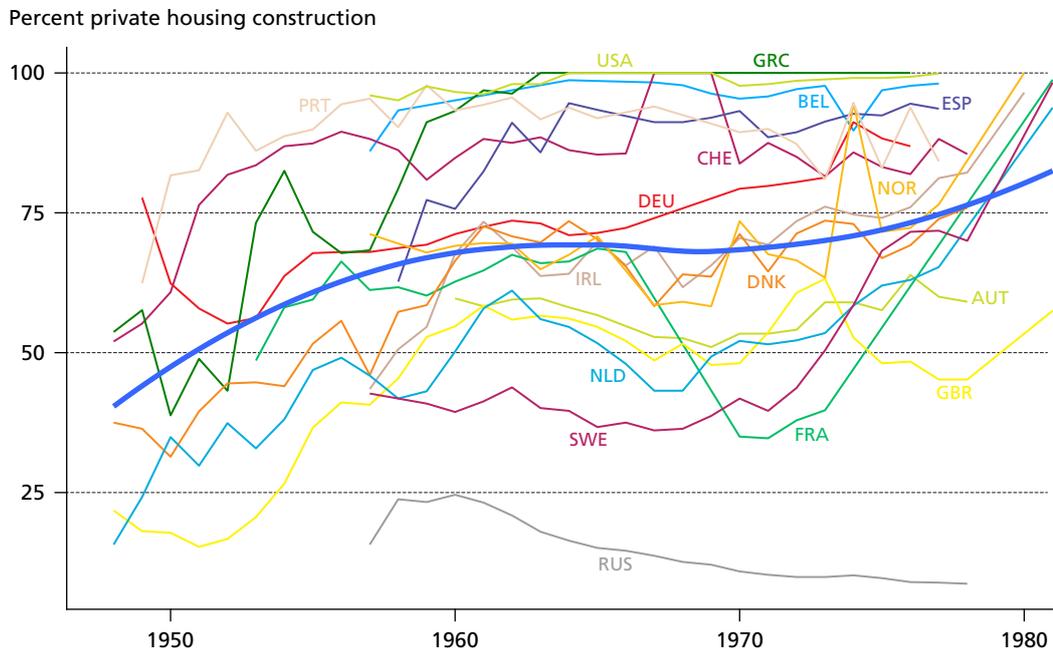


Sources: Average and standard deviation of OECD countries (Kohl 2020).

nationalizations. England and Scotland were again more leaders of the continental tradition than part of the Anglophone group. In the postwar periods, state provision made up large shares of housing finance, reaching more than 50 percent in post-WWII France or post-WWI New Zealand (Davidson 1994), up to 40 percent in Germany's two postwar eras (Blumenroth 1975), and up to 20 percent in Australia and Italy (Minelli 2004) after the wars. This is also visible in the available new construction statistics, which reached their all-century peaks per capita in the 1970s. With hardly any conversion of existing stock into public housing units, the social housing stock was predominantly built up over the years through new construction. Figure 4 shows the strong inroads public housing made into the share of private housing production since 1920.

After WWII, the United Nations and its special commission on housing in Europe collected unique comparative data on housing, including splitting up new construction by constructing entity, starting after WWII and discontinued in the 1970s (UN 1958–2001). Due to the panoply of non-private institutions of housing provision, the share of purely private construction in the total new construction of housing units can serve again as a common denominator: while the Soviet Union, Southern and Eastern European, as well as non-European Anglophone countries follow a fairly well-identifiable downward trend, North-Western European countries reveal considerable variation (Figure 4). Although housing policy instruments were comparable and characterized by a transnational ex-

Figure 5 Private share in post-WWII reconstruction



Note: The thick blue line approximates the mean through a loess function.

Source: UN (1958–2001) and own representation.

change and diffusion, they were implemented and adapted unequally across countries. In Belgium, home ownership promotion remained dominant (Goossens 1982), while countries such as Austria, Denmark, the Netherlands, and Sweden strongly promoted public authorities or housing associations (Kemeny 1995). In the UK, both social housing and homeownership grew at the expense of the market rented sector. Germany subsidized not only local authorities and cooperatives but also private providers of rental housing, while Switzerland remained the major exception (Müller 2021), where the private, unsubsidized rental market continued to dominate (Figure 5).

Since the 1980s (and the end of the Iron Curtain), the general social housing trend is one of decline, in line with Harloe's grand narrative on the rise and fall or residualization of social housing (Harloe 1995). This is evident in both housing stock and construction flow data. The steepest declines can be found in post-socialist countries, where large-scale conversion processes took place, this time in the opposite direction from revolutionary times (Clapham 1996; Lux and Sunega 2014). Among Western European countries, however, retrenchment was not the dominant trend across all countries: the residual housing welfare states had little to retrench in the first place. Relative to the social housing peak years of the 1970s, the troughs were 21 percent lower in the US, 10 percent in Belgium, and 37 percent in Canada. But among North-Western European countries, quite a few have retained relatively high levels of ongoing social housing provision, with declines of 14 percent in Denmark, 28 percent in the Nether-

lands, and 28 percent in Sweden. Others, Germany above all, truly retrenched into the residual provision group: its decline of 76 percent leads the Western countries, followed by Ireland (63 percent), Scotland (58 percent), and England (45 percent). One main difference between these different trajectories is whether large-scale conversions from public to private took place or not and whether specialized social housing providers maintained a role in new construction. Large social housing sectors were able to survive where dedicated social housing institutions had been in place, even though they could also change their nature from within (Aalbers, Loon, and Fernandez 2017).

Social housing has disproportionately been an urban phenomenon. This is not only because cities were the site of the greatest housing problems and needs due to the urbanization process. Municipal housing was also the precursor of many state programs and municipal companies were among the main institutional carriers of national programs. In pre-WWI cities, social housing amounted to less than 10 percent of the stock, e.g., 1 percent in Vienna in 1910. German cities averaged about six to seven percent social shares in new housing construction. In the interwar period, however, social housing grew to double-digit numbers, e.g., Zurich cooperatives made up 16 percent in 1936 and Copenhagen's state (1 percent), municipal (4 percent), foundation (5 percent) and cooperative housing (5 percent) totaled 15 percent in 1921. Many cities reached new highs during the golden era of subsidized public housing after World War II. Whereas in Switzerland, the city of Zurich reached a share of about one-quarter of the total stock during a short period of strong subsidies until 1950, London reached its all-time high of one-third of all dwellings by 1981. London also exemplifies the decline of social housing in many cities since the 1980s with the share decreasing to 24 percent by 2011. German cities saw their social housing peaks of more than 30 percent in the 1980s and have witnessed a decline to less than 10 percent in recent years, as social rentals were converted to private rentals after amortization of subsidized mortgages (Baldenius, Kohl, and Schularick 2020). In Zurich, the proportion was maintained at higher levels. In 2011, the population decided in a ballot that the share would have to increase to one-third by 2050. However, until today, due to the strength of private construction, the percentage has stagnated slightly above one-quarter, despite the large number of new social housing units built in recent years.

#### **4 Bivariate findings: Social housing and the broader housing welfare state**

How do social housing institutions correlate with other housing policies? Governments have various means and institutions at their disposal to reduce market rents or house prices for housing market participants. The provision of publicly supply-side subsidized rentals which underlies our comparative data work and had become a dominant understanding of social housing in the 20th century is obviously only one such institution. Other prominent institutions include rental allowances, fiscal exemptions (imputed

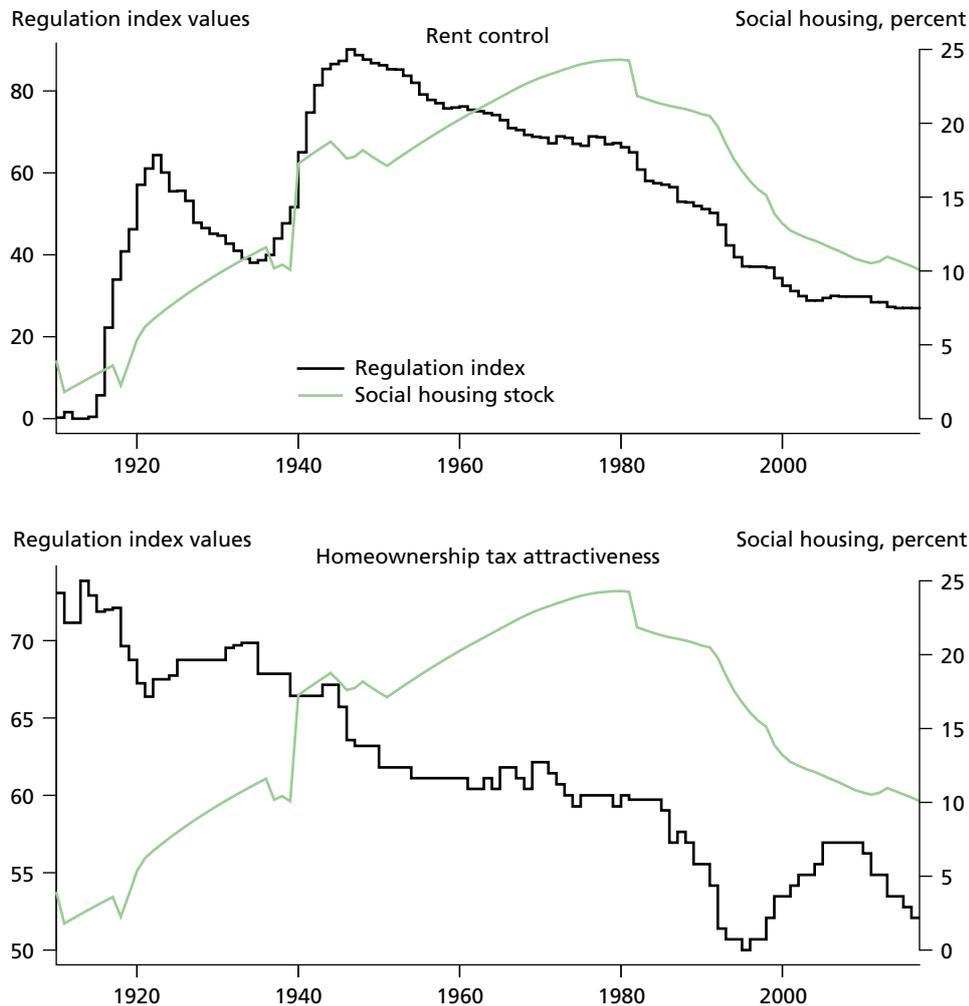
rent, VAT on the new housing, capital gains tax, mortgage tax exemptions, and property taxes), and socialized homeownership subsidies (credit and savings incentives). While all these institutions figure directly or indirectly in governments' budgets, either as direct expenditure or foregone tax income (Pollard 2011), housing welfare in a broader sense also includes a more budget-neutral regulatory dimension of rental markets (Kholodilin 2020). Many more regulatory dimensions play into housing welfare – e.g., building codes, urban planning, zoning, environmental policy, etc. – which are often very local in nature. In the following, we focus on those with a national regulatory dimension for which internationally comparative data are available.

A central regulatory housing policy comes in the form of rental market regulation that can use combinations of rent controls, tenancy security, and housing rationing measures to potentially create *de facto* social housing arrangements through legal means. Another one is mortgage lending regulation, which can make mortgage loans more broadly and easily available through more permissive lending regulation and government absorption of risks. At least superficially many of these regulatory measures are budget-neutral, even though they can obviously imply indirect and future costs. This list is not exhaustive but probably describes the largest and the comparatively measurable part of a more general housing welfare state. In the following, we describe how social housing has historically evolved within this larger housing welfare state, drawing on other existing statistical attempts at mapping housing welfare.

The longest-run comparison of social housing can be undertaken with rental regulation and the fiscal incentives regulation for homeowners (Kholodilin et al. 2021). Both dimensions have been standardized in historic-comparative regulation indices for a wide range of countries since the date of their introduction in about 1914 (Kholodilin 2020; 2021), where a value of 1 is equivalent to the strongest possible intervention into private rental markets for the rental regulation index. It is highest for the fiscal homeowner attractiveness index, when imputed rents are not taxed and interest payments for homeowners are tax deductible. Over time, the regulation of private rentals broadly correlates with the rise and decline of social housing, as Figure 6 shows: both became extremely important in and after the world wars and both started to decline again afterwards, without completely disappearing. Social housing flanked rent regulation in a complementary way, compensating for the loss of private construction incentive.

Some countries never developed a larger social housing stock in the rental sense because they followed the path of socialized homeownership. In fact, the focus of the first housing laws in most countries before WWI was on the state promotion of socialized homeownership and in most countries social housing always included one branch meant for owner-occupiers such as the “*accession social à la propriété*” in France (Frouard 2012). Even in tenant-dominated German social housing, the so-called first subsidy pillar with substantial government contribution made up 30 percent of owner-occupied housing in 1962–1999, the second pillar with more modest government contribution as much as 70 percent (Sensch 2010). Socialized homeownership regimes in countries such as Bel-

Figure 6 Rent control and homeownership tax attractiveness vs. social housing stock



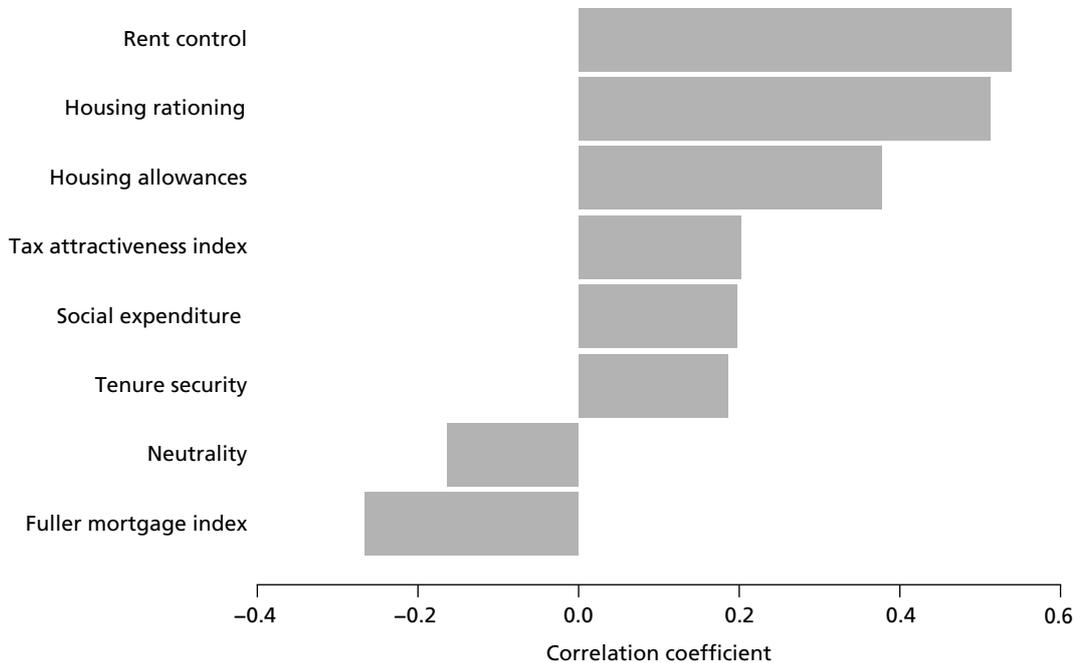
Note: Black lines correspond to the regulation indices that vary between 0 (no rent control or only taxes and no tax deductions for homeowners) and 100 (very strict rent control or no taxes related to the real estate for homeowners). The greenish line depicts the social housing stock as a percentage of the total housing stock.

Sources: Kholodilin (2020) and Kholodilin et al. (2021).

gium, Finland, Ireland, and, partly, Iceland even made homeownership the primary or even only goal of governments' housing programs. In Ireland, for instance, more than 50 percent of annual construction was in this form until the 1950s and by 1971 more than 10 percent of households were living in dwellings purchased from local authorities (Norris 2016b).

The relationship between social housing and socialized homeownership, similar to fiscal ownership incentives above, is mostly negative: countries have either followed one path or the other and, within countries, programs for owner-occupiers compete with public rentals for resources. The fiscal attractiveness of housing investment is generally

Figure 7 Correlations between social housing rates and more general housing welfare



Note: The bars show the magnitude of correlation coefficients between social housing rate on the one hand and a respective indicator of housing welfare on the other hand.

Sources: 1) Kholodilin (2020) for rent control, tenure security, and housing rationing; 2) for tax attractiveness and neutrality indices; 3) OECD (2020) for housing allowances and social expenditure as percentage of GDP; 4) Johnston, Fuller, and Regan (2020) for Fuller mortgage index; and 5) own calculations.

positively associated with social housing. Both can be seen as following a government investment logic, where social housing requires more direct public subsidies, while tax incentives through exemptions stimulate private investment. The association with how biased the fiscal support is towards homeowners (neutrality index) is hence negative. Such a negative association also holds with how liberal countries regulate mortgage lending. This has been proxied with a combination of different measures and summarized in an index of mortgage encouragement that scores highest if countries use secondary mortgage markets, subsidize mortgages, have high loan-to-value (LTV) ratio, and low capital gains taxes, as well as anti-usury laws in place (Fuller 2015). Where mortgage encouraging countries tend to financialize their housing sectors, i.e., encouraging mortgage indebtedness through liberal legislation, this correlates negatively with the extent of decommodifying social housing (Figure 7).

Finally, the OECD social expenditure database, which extensively reports on the traditional social-security welfare state, also includes one item with “housing expenditure,” which – far from covering all housing-related budget items – is mainly referring to rental allowances, i.e., a demand-side subsidy in favor of private tenants (OECD 2020). This is in line with the general observation that policies favoring private tenants go along with policies favoring public tenants. The total OECD social expenditure, by con-

trast, is without any clear association with social housing. While housing and general welfare have been built up at the same time and rather in countries with more generous welfare states, this positive correlation of the earlier years was counteracted by the social housing retrenchment in the more recent period. Overall, social housing is part of housing regimes directed towards investments and tenants and less pronounced where (financialized) homeownership welfare prevails.

## 5 Multivariate: The determinants of social housing provision

To understand the determinants of social housing provision beyond these bivariate findings, we turn to a panel data regression model methodologically and to more general welfare approaches theoretically. Even the “wobbly pillar” metaphor cited above suggests that social housing provision could be understood in welfare theory terms. A first such approach, the logic of industrialism, then, would see social housing as determined by GDP development: richer countries can afford more social housing (Donnison and Ungerson 1982). A second approach is partisan: as a social policy, social housing could more likely be associated with (center-)left governments (Schmidt 1989). Third, small states with stronger redistributive traditions could be more inclined to have large social housing stocks (Obinger et al. 2010). Fourth, social housing has an obvious legacy of (post-)war welfare such that countries that experienced greater war and postwar housing shortages would develop more social housing (Obinger, Petersen, and Starke 2018). Fifth, social housing can be seen as a functional complementarity of rent regulation: known to impact new constructions negatively, rent control may require government to step up the production of social housing to fill the gap left by the private sector. Finally, ever since the work of Jim Kemeny (Kemeny 1992), social housing as an integral part of unitary rental markets has been seen as one element of a broader welfare state arrangement, with more universal welfare states also providing more than residual social housing.

In order to determine the factors of the social housing rates we use panel data models. Due to multiple missing observations, the social housing rates are interpolated using the *stinterp* function of the *stinepack* library of the statistical programming language *R*, which is based on piecewise rational functions using Stineman’s algorithm (Stineman 1980). Given the strong persistence of social rental housing rates and in order to remove serial correlation and potential non-stationarity, we compute the dependent variable as the first difference of the social housing rate. The model can be formulated as:

$$y_{it} = \beta' x_{i,t-1} + \gamma' z_{i,t-2} + \eta_i + \theta_t + v_{it}$$

where  $y_{it}$  is the first difference of the social housing rates in country  $i$  in year  $t$ ;  $x_{it}$  is the vector of explanatory variables;  $z_{it}$  is the vector of rental market regulation indices;  $\eta_i$  are country fixed effects;  $\theta_t$  year fixed effects;  $v_{it}$  the random disturbance; and  $\beta$  and  $\gamma$

are the vectors of coefficients to estimate. To use time-invariant independent variables and for robustness we also estimate random-effect models.

To operationalize the different explanatory approaches mainly derived from the general welfare state literature, we use growth rates of the real GDP per capita and of the general population, completed dwellings-to-population ratio, and the population-to-housing stock ratio to proxy periods of housing shortages, left-right government to test the partisan dimension, rental market regulations, and social expenditure-to-GDP to test the complementarity hypotheses (cf. Table A1 in the Appendix for data sources and descriptive statistics).

The estimations are based on an unbalanced data set covering nineteen so-called developed countries<sup>3</sup> over the time period between 1904 and 2013. The estimation results are reported in Table 1.

Table 1 Fixed effect models (country, both) on social housing rates

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Rent control	27.34*** (3.63)		13.41** (4.28)		6.69 (3.82)		5.89 (4.87)	
Hard controls		17.35*** (2.70)		6.49* (2.95)		2.75 (2.78)		0.02 (3.24)
Soft controls		0.32 (3.99)		8.41* (4.03)		-4.43 (4.01)		1.91 (4.13)
GDP growth	0.64* (0.29)	0.62* (0.29)	0.30 (0.34)	0.29 (0.34)	0.12 (0.20)	0.12 (0.20)	0.10 (0.23)	0.10 (0.23)
Pop. growth	-62.78*** (6.28)	-61.52*** (6.48)	54.91*** (11.82)	58.03*** (11.98)	-26.19** (8.07)	-27.20*** (8.05)	40.84*** (10.90)	43.09*** (11.05)
Construction per 1,000 inhab.	0.09** (0.03)	0.10** (0.03)	0.09* (0.04)	0.09* (0.04)				
Social expenditure	0.11*** (0.02)	0.11*** (0.02)	0.11*** (0.02)	0.11*** (0.02)	0.09*** (0.02)	0.09*** (0.02)	0.10*** (0.02)	0.10*** (0.02)
Left-right	-0.18 (1.21)	-0.23 (1.22)	-1.67 (1.22)	-1.54 (1.22)	-0.59 (1.18)	-0.50 (1.18)	-1.83 (1.22)	-1.66 (1.22)
Population-to-housing ratio					15.85*** (1.54)	15.31*** (1.61)	3.53 (1.97)	3.64 (1.99)
Fixed effects	Country	Country	Both	Both	Country	Country	Both	Both
R <sup>2</sup>	0.19	0.19	0.05	0.05	0.24	0.24	0.03	0.03
Adj. R <sup>2</sup>	0.18	0.18	-0.04	-0.05	0.22	0.22	-0.07	-0.07
Num. obs.	1,366	1,366	1,366	1,366	1,434	1,434	1,434	1,434

\*\*\* $p < 0.001$ ; \*\* $p < 0.01$ ; \* $p < 0.05$

A first observation is that some of the typical welfare-state explanatory variables remain insignificant: economic growth and left-right leaning of parliaments are hardly statistically significant in understanding changes in social housing rates, even though the sign of the coefficient points suggests a weak association with left-wing governments. Classifying countries additionally in three different sizes shows that medium rather than

3 Australia, Austria, Belgium, Canada, Denmark, Finland, France, Germany, Ireland, Italy, Japan, Netherlands, Norway, Portugal, Spain, Sweden, Switzerland, the UK, and the USA.

small countries have most social housing (not shown). Two other groups of variables are more important: First, variables measuring housing-shortage periods are all significantly associated with more social housing, e.g., country-years with higher crowding numbers (population per housing unit in columns [4]–[8]), higher construction activity per population in columns (1)–(4), or periods of strong population growth. In this regard, social housing bears some relation with war-related welfare. Second, variables showing some form of policy complementarity are significantly positively associated with social housing. This is the case for rent regulation: when rent controls cap the rent prices and returns on private rental housing, governments need to come in and increase housing supply to make up for the loss of private construction incentives. In the even columns of Table 1 we distinguish moreover between the hard or first-generation price controls which set absolute price caps during and after the wars and the softer or second-generation controls that allow moderate price increases. The total rent control effect is rather driven by the hard controls. The complementarity between rent regulation and social housing is indirectly supported by its trade-off with fiscal homeownership support. The second kind of complementarity is with social expenditure: country-years of growing welfare states are positively associated with increases in social housing stock, making housing an integral part of larger welfare state arrangements.

Table 2 Random effect models on social housing rates

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
Rent control	36.92*** (3.51)		26.93*** (0.11)		8.83* (3.75)		8.81*** (0.11)	
Hard controls		21.70*** (2.69)		17.84*** (0.08)		4.25 (2.75)		4.24*** (0.08)
Soft controls		−6.93 (3.95)		−4.04*** (0.12)		−4.28 (3.95)		−4.28*** (0.12)
GDP growth	0.60* (0.30)	0.53 (0.30)	0.46*** (0.01)	0.45*** (0.01)	0.03 (0.20)	0.03 (0.20)	0.03*** (0.01)	0.03*** (0.01)
Pop. growth	10.51*** (1.97)	9.63*** (1.97)	7.51*** (0.06)	7.82*** (0.06)	3.63* (1.62)	3.62* (1.63)	3.63*** (0.05)	3.62*** (0.05)
Construction per 1,000 inhab.	0.13*** (0.04)	0.14*** (0.04)	0.12*** (0.00)	0.13*** (0.00)				
Social expenditure	0.10*** (0.02)	0.09*** (0.02)	0.10*** (0.00)	0.10*** (0.00)	0.09*** (0.02)	0.08*** (0.02)	0.09*** (0.00)	0.08*** (0.00)
Left-right	−0.21 (1.24)	−0.26 (1.24)	−0.72*** (0.04)	−0.59*** (0.04)	−0.94 (1.18)	−0.88 (1.18)	−0.94*** (0.04)	−0.88*** (0.04)
Population-to- housing ratio					18.44*** (1.15)	17.96*** (1.23)	18.43*** (0.03)	17.96*** (0.04)
Roman legal origin (Ref. common-law)	−5.03 (8.30)	−4.01 (7.33)	−3.81*** (0.25)	−3.80*** (0.22)	3.17 (7.52)	4.34 (7.32)	3.18*** (0.23)	4.34*** (0.22)
Germanic	1.95 (9.16)	2.87 (7.93)	2.12*** (0.28)	2.57*** (0.24)	1.61 (8.32)	2.82 (8.01)	1.61*** (0.25)	2.82*** (0.24)
Scandinavian	5.81 (9.27)	5.01 (8.10)	7.16*** (0.28)	5.96*** (0.24)	19.47* (8.53)	20.07* (8.24)	19.47*** (0.26)	20.08*** (0.25)
Random effects	Country	Country	Both	Both	Country	Country	Both	Both
R <sup>2</sup>	0.15	0.15	0.15	0.17	0.23	0.23	0.21	0.21
Adj. R <sup>2</sup>	0.15	0.15	0.14	0.17	0.22	0.22	0.20	0.20
Num. obs.	1,366	1,366	1,366	1,366	1,434	1,434	1,434	1,434

\*\*\* $p < 0.001$ ; \*\* $p < 0.01$ ; \* $p < 0.05$

To distinguish the results by country groups and for general robustness, we additionally estimate a random-effects model (Table 2) with legal-origins as the time-variant country classifier (La Porta, Lopez-de-Silanes, and Shleifer 2008). Legal origins have been shown to have economic effects and moreover correlate with welfare and capitalism typologies while avoiding their classification problems of difficult cases. While the substantive results of the main coefficients are robust, the country-group effects confirm a complementarity of welfare with social housing regimes, where countries of Scandinavian legal origin are most related to social housing when compared to the Anglophone common law countries on the other end, with countries of Germanic and Roman legal origin in between.

## 6 Conclusion

Social housing has been a latecomer in Western countries' social policy reforms and never really occupied as permanent a place as countries' social security systems. Its introduction and expansion phases correlate with those of the general welfare state, with the aftermath of the two world wars being decisive moments of growth. Similar to the welfare state, the 1970s were a watershed: at the peak of the reconstruction boom, private construction started to take over and social housing entered a stagnation or, more frequently, retrenchment phase. Today total housing production, social housing construction, and social housing stock levels have on average reached historically low values both in countries and their major cities. The post-socialist countries joined the club of privatized housing provision after 1990. Contrary to the much-observed inertia of social security, social housing has been a case where significant cut-backs have occurred in various countries.

Social housing, narrowly understood here as state supply-side support for below-market rentals, is only one pillar in the total housing welfare state and its generally declining trend does not necessarily imply that housing welfare in general has decreased. In fact, we found that the declining trend correlates positively with the regulation of private rentals and housing allowances, but might be compensated by more subsidies in favor of homeowners through fiscal exemptions and mortgage regulation. *Prima facie*, we do not see globally that less social housing is compensated for by more social expenditure elsewhere.

The declining trend in social housing is probably less surprising to scholars familiar with the existing literature we heavily build upon than the perhaps intriguing inertia of the social housing stock which we find in countries as diverse as Denmark, the Netherlands, and the UK. It is true that, with few exceptions, hardly any country has higher social housing levels than at its peak social housing moment, but in light of gloomy predictions about a complete collapse of the social housing pillar, it has had resilience close to the one claimed for other spheres of the welfare state. We noted that wherever social

housing has morphed into a well identified institutional carrier instead of being just one housing segment, the survival of large social housing stocks was more likely. These organizations might have acted as a reinforcing mechanism and lobby against further retrenchment. The more they were independent of governments, the less they were at the whim of politically motivated cut-backs.

High levels of social housing in these countries may not imply that nothing has changed. For one, recent Dutch research has shown how the financialization of social housing providers can also change organizations from within (Aalbers, Loon, and Fernandez 2017) and, while the name and statistical category might have remained unchanged, the institution may no longer be recognizable to a social tenant of the 1970s. The building statistics also reveal that, whatever the share of social housing left in the stock, new construction of social housing is not necessarily showing a rejuvenation trend, but should rather lead one to expect that the aging social housing stock will gradually be replaced in the future.

The new synoptic view should bear some surprises for the many attempts to classify countries into typologies. Our descriptive country grouping by broad geographies mainly serves descriptive purposes and its heterogeneity should make one cautious about taking geography too seriously. Also, the country grouping that Kemeny (1992) once subsumed under the large header of integrated housing regimes inspired by an Ordoliberal German approach turns out to be quite heterogeneous. Whereas in Austria, Denmark, the Netherlands, and Sweden social rented housing shows strong resilience, in Germany the sector has declined sharply, while in Switzerland it has never developed strongly at all. At the other end of spectrum, in the countries in Southern and non-European Anglophone countries the decline of social housing was obviously less important. However, none of the countries embarked on a late path of promoting social rented housing.

The paper allows bringing decommodification and housing welfare research closer together and, while it does support Kemeny's idea of a complementarity between large welfare states in terms of social expenditure of Scandinavian legal origin and more social housing, it also finds that, on the explanatory level, typical welfare state predictors (GDP, left-right, small states) have low power when compared to more housing-related factors such as fundamental demography, housing shortages and complementarities with countries approaches towards the private-rental and owner-occupier segment: strict rental regulation requires social housing to step in, while the promotion of homeownership and social housing rather stand in a political trade-off relationship. Overall, the paper should encourage future investigations into the varieties of housing welfare and their intricate relationship with the more classical branches of the social-insurance based welfare state.

## Appendix

Table A1 Data sources and descriptive statistics

Variable	Source	Number of observations	Minimum	Average	Maximum
Social rental housing rate, percent	own calculations, including interpolation	3,050	0	19.7	83.1
Growth of real per-capita GDP, percent	Maddison Project Database ( <a href="https://www.rug.nl/ggdc/historicaldevelopment/maddison/releases/maddison-project-database-2020">https://www.rug.nl/ggdc/historicaldevelopment/maddison/releases/maddison-project-database-2020</a> )	8,901	-94.8	2.1	100.8
Population size, million persons	Maddison Project Database ( <a href="https://www.rug.nl/ggdc/historicaldevelopment/maddison/releases/maddison-project-database-2020">https://www.rug.nl/ggdc/historicaldevelopment/maddison/releases/maddison-project-database-2020</a> )	9,821	0.1	37.5	1,385.4
Completed dwellings-to-population ratio, dwellings per 1,000 persons	Kohl (2020)	3,353	0.02	5.7	30.6
Population-to-housing stock ratio, persons per dwelling	Cui and Kohl (2022)	2,117	1.7	3.4	12.3
Social expenditure-to-GDP ratio, percent	OECD ( <a href="https://stats.oecd.org/">https://stats.oecd.org/</a> )	2,738	0	10.8	31.9
Left-right head of government (3 values: left, center, and right)	(Brambor and Lindvall 2018)	3,594	-1	0.2	1
Rental control index (0, if there is no rent control, 1, if rent control is very strong and omnipresent)	Kholodilin (2020)	13,786	0	0.5	1
First generation of rent control (if rents are set by special bodies and are frozen)	Kholodilin (2020)	13,786	0	0.5	1
Second generation of rent control (if rent increases not exceeding inflation rate are allowed)	Kholodilin (2020)	13,786	0	0.1	1
Rental market regulation index (simple average of rent control and tenure security indices)	Kholodilin (2020)	13,786	0	0.4	0.9

Table A2 Country-specific definition and sources

Australia	Units occupied by tenants of government housing (state or territories)	Decennial housing and population census reported in annual statistical yearbooks
Austria	Local authorities, other public bodies, housing associations	Census data (Häuser- und Wohnungszählungen)
Belgium	Public authorities, eligible housing associations	Census data (recensement); Statbel
Bulgaria	Public authorities	1) 1975, 1985, and 1992: Boyan Zahariev, Dyliana Giteva, and Ilko Yordanov. 2014. TENLAW: Tenancy Law and Housing Policy in Multi-level Europe. National Report for Bulgaria, p. 17; 2) 1995–2019: Communication per email with Boyana Ivanova of National Statistical Institute of Bulgaria
Canada	Eligible social housing under CMCH programs excluding entrepreneurial, rent assistance and on-reserve	Suttor, Greg. 2016. Still Renovating: A History of Canadian Social Housing Policy. Montreal: McGill Queen's Press, p. 169; Social and Affordable Housing Survey (Canada)
Denmark	Non-profit, state and municipal rentals	Jensen, L. 2013. Varför så olika? Nordisk bostadspolitik i jämförande historiskt ljus. In: Danmark – lokal boenddemokrati och nationell korporatism, edited by B. Bengtsson, E. Annaniassen, L. Jensen, H. Ruonavaara, and J. R. Sveinsson. Malmö: Égalité, pp. 49–117.
England and Wales	Local authorities, housing associations, other public authorities	Holmans, A. E. 2005. Historical Statistics of Housing in Britain, Cambridge Centre for Housing and Planning Research, p. 130 and 133; Ministry of Housing, Communities & Local Government (Great Britain)
Finland	State-supported rentals	Ruonavaara, H. 2006. Finland – den dualistiska bostadsregimen och jakten på det sociala. Malmö: Égalité.
France	Municipal, cooperative rental (HLM)	Housing surveys (Enquête de logement)
Whole Germany and West Germany	Public authorities, co-operatives, publicly subsidized providers	Census data (Gebäude und Wohnungszählungen); Allbus-survey data (post 1984)
East Germany	State and cooperative rentals	Census data of the GDR; Allbus-survey data (post 1990)
Hungary	Rentals under state or municipal authority	Census 1990 Központi Statisztikai Hivatal – Summary tables (STADAT) – Time series of annual data – Housing and public utilities
Iceland	Municipal rental housing (Félagsbústaðir in Reykjavik)	Rannsóknarnefnd Alþingis 2013, Skýrsla rannsóknarnefndar Alþingis um íbúðalánasjóð o.fl., Reykjavik
Ireland	Local authorities, voluntary bodies	Census data; Norris, Michelle. 2016. Property, Family and the Irish Welfare State. Berlin: Springer, p. 128.
Japan	Local governments, urban renaissance agencies, public corporations	Housing and Land Survey (Japan)
Netherlands	Housing associations, local authorities	Census data; Statistics Netherlands: Haffner, Marietta, et al. 2009. Bridging the gap between social and market rented housing in six European countries? Amsterdam: IOS Press, p. 207.
Norway	Local authorities	Stamsø, Mary Ann. 2014. Norway. In: Private Rental Housing. Comparative Perspectives, edited by Tony Crook and Peter A. Kemp. Cheltenham: Edward Elgar, pp. 125–147, p. 129.

Table A2, continued

Poland	Local authorities	1) In 1995–2018: Personal email communication with Jakub Bellok from Główny Urząd Statystyczny; 2) in 1988: Census 1988 "Warunki mieszkaniowe: Polska / [oprac. pod kier. Bronisławy Ratajczak] ; Główny Urząd Statystyczny. [Departament Spisów i Badań Masowych]." Tab. 2(12), p. 55; 3) in 1978: Census 1978 "Warunki mieszkaniowe. Z. 200/I. Polska. Warszawa: GUS, 1980", Tab. 3.3; in 1970: Census 1970 "Zasoby i warunki mieszkaniowe : Polska : wyniki ostateczne. Z. nr 19, Mieszkania i budynki / Główny Urząd Statystyczny. Biuro Spisów." Tab. 9, p. 110; 5) in 1960: Census 1960 "Mieszkania, budynki mieszkalne: Polska: Spis Powszechny z dnia 6 grudnia 1960 r.: wyniki ostateczne / Główny Urząd Statystyczny Polskiej Rzeczypospolitej Ludowej", Tab. 20, p. 26 or p. XXXII.
Scotland	Local authorities, housing associations	Ministry of Housing, Communities & Local Government (Great Britain)
Serbia	Non-private dwellings	Statistical Office of the Republic of Serbia
Singapore	Rentals offered through the Housing and Development Board (HDB)	HDB Annual Reports, Yearbook of Statistics Singapore
Slovenia	Public authorities	Erna Miklič (Statistical Office of the Republic of Slovenia)
Slovakia	Non-private and non-co-operative ownership; 2011: Local authorities	Statistical Office of the Slovak Republic
Sweden	Non-profit rentals	Bengtsson, B. 2006. Sverige – kommunal allmännytt och korporativa särintressen. Malmö, Égalité.
Soviet Republics	Share of state (государственный) and municipal (муниципальный) housing stock, before 1980s urban averages	1) SSSR. 1982. Narodnoe hozyaystvo, 1922–1982. Moscow; 2) Azerbaijan – State Statistical Committee of the Republic of Azerbaijan; 3) Belarus – Belstat; 4) Estonia – Statistics Estonia; 5) Georgia – National Statistics Office of Georgia; 6) Kazakhstan – Agency of Kazakhstan of Statistics; 7) Kyrgyzstan – National Statistical Committee of the Kyrgyz Republic; 8) Latvia – Central Statistical Bureau of Latvia; 9) Moldova – National Bureau of Statistics of the Republic of Moldova; 10) Russia – Rosstat; 11) Ukraine – Ukrstat.
Spain	Subsidized rent units	Donner, Christian. 2000. Wohnungspolitik in der Europäischen Union: Theorie und Praxis. Vienna: self-published, p. 275; National Statistics Institute (Spain)
Switzerland	Public authorities, co-operatives (private providers are missing)	Census data (Volkszählungen); Federal Statistical Office (Switzerland); Schweizerische Gesellschaft für Statistik und Volkswirtschaft (ed.). 1955. Handbuch der Volkswirtschaft, Band 2. Bern: Benteli-Verlag, p. 634.
USA	Public authorities, government subsidized	American Housing Survey (USA)

*Australia*

Whereas by the end of the nineteenth century a (thin) majority of Australians resided in market rented housing, which was often precarious and dominated by private landlords and finance institutions, homeowners were already in the lead by the 1920s. The ideal of owner occupation was visible in the first social housing initiatives as well, most of which consisted of forms of social homeownership. Government support for social rental housing emerged – as in other non-European English-speaking countries – during the 1930s in the wake of the housing shortage caused by the Great Depression. The Housing Trust of the South Australian Government in 1937 marked the introduction of national public housing systems. But it is the Commonwealth State Housing Agreement of 1945 that is commonly associated with the beginning of the golden era of social housing. Decent housing, provided by public authorities and often of mediocre quality, was mostly built for modest-income workers (in employment), while the poorest were left to market rentals (Hayward 1996). Legislation and the ideal of homeownership ensured that public housing has never grown beyond a residual role. Public housing was never intended as an alternative to homeownership but rather as a second-best option for low-income families. High levels of public housing expansion were further prevented by the 1956 Commonwealth State Housing Agreement, which encouraged the sale of public housing as a means of promoting homeownership. Since the 1960s, the distribution between tenures has been fairly stable by international standards, with homeownership accounting for about 70 percent (Hulse 2014). Nevertheless, financialization, deregulation, as well as a shift from supply to demand subsidies led to residualization since the 1980s. Social housing fell by a quarter to about 4 percent and has been increasingly allocated to the poor. At the same time, private renting rose from 20 percent to 25 percent. However, since the Financial Crisis 2008–2009, housing policy has regained in importance. Social rented rental in Australia is mainly provided by public authorities, although in recent decades community or non-profit organizations have increasingly emerged (Yates 2013).

*Austria*

In the nineteenth century, philanthropic groups and employers built the first housing for the working class, and the first building cooperatives were founded (Fuchs and Mickel 2008). Eventually, at the beginning of the 20th century, early social housing acts were passed.<sup>1</sup> Furthermore, in the wake of the crisis of World War I, public authorities intervened in the housing market. However, the first major support for public social housing originated from initiatives at the municipal level (Bauer 1993). After winning the elections in Vienna, the Social Democrats built thousands of public housing prop-

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1 In particular, Gesetz vom 22. Dezember 1910, betreffend die Errichtung eines Wohnungsfürsorgefonds created the Housing Welfare Fund to provide credit guarantees and loans for the construction of small dwellings for the low-income population.

erties as part of a local housing promotion program which constituted a key element of the welfare program of Red Vienna's municipal socialism in 1918–1934 (Reinprecht 2014). After World War II, a new era of federal housing promotion was initiated. The postwar period saw the start of large-scale housing programs as an important pillar of the emerging national welfare state. Given the destruction caused by the war, priority was initially given to quantitative reconstruction. Between 1948 and 1954, the legal foundations were laid for the promotion of both owner-occupied homes and social rented housing (*Bundes-Wohn- und Siedlungsfonds* in 1948, *Wohnhaus-Wiederaufbau-fonds* in 1948, *Wohnbauförderungsgesetz* in 1954). Independent non-profit organizations such as housing cooperatives and associations became key providers of social housing. In the 1950s, the share of public authorities in the construction of new social housing was around one-third, but it declined over time. From 1968 and increasingly from the 1980s onward, housing policy was increasingly regionalized and deregulated, and market-based solutions gained in importance. In the early 2000s, following trends in other countries, housing policy was liberalized under the right-wing government and public-private partnerships began to gain in importance. However, in Austria, housing assistance continues to be an important pillar of the welfare state. In the 2010s, about four out of five new dwellings were still supported directly or indirectly by public subsidies. The social housing sector accounts for more than half of all rented housing (Donner 2000; Reinprecht 2014).

### *Belgium*

Since the nineteenth century, Belgium's housing policy has been strongly oriented toward the promotion of homeownership and has favored the construction of single-family houses in rural and semi-urban areas and decentralized residential development (Smets 1977). Liberal-conservative policies in favor of homeownership have been much more powerful in Belgium than social-democratic policies in favor of social housing (Puissant 2008). During the nineteenth century, employers and philanthropic groups as well as some municipalities built the first workers' housing units on a small scale. Housing policy at the state level emerged with the Housing Act of 1889,<sup>2</sup> which mainly aimed to promote homeownership for the working class (de Meulder 1988). The 1919 Act increased intervention in the housing market with the creation of the *Société nationale des habitants et logements à bon marché* (SNHLBM), which supported not only homeownership but also the construction of low-income housing.<sup>3</sup> The social housing units were mainly built and managed by local authorities, cooperatives, and private organizations. However, as early as 1922, state support was strongly reduced and priority was once again given to homeownership (Van den Eeckhout 1992). After the turmoil of World War II, governmental support was again directed toward single-family own-

2 Loi du 9 août 1889 sur les habitations ouvrières.

3 Loi du 11 octobre 1919, portant création de la Société nationale des logements et habitations à bon marché.

er-occupied dwellings. Furthermore, starting in 1949, the SNHLBM was reactivated to promote social housing. However, housing shortages among the poorest remained unresolved (Puissant 2008). In the 1970s and 1980s, Belgium's housing policy was restructured and federalized. The economic crisis during the 1980s led to a severe housing crisis. As a consequence, support for social housing was strongly reduced, giving rise to the emergence and institutionalization of grassroots organizations such as social rental agencies as new leaders of social housing initiatives (De Decker 2002).

### *Canada*

The development of housing policy in Canada followed trends in the United States (Harris 2000). During the Great Depression, the Dominion Housing Act of 1935 was the first major housing legislation, but it was only with the 1938 National Housing Act that funding for social housing was introduced. In 1945, the Central Mortgage and Housing Corporation (CMHC) – the key organization for housing policy in Canada – was established and began to encourage private developers to construct low-rental housing. Furthermore, the National Housing Act of 1949 initiated joint federal-provincial programs to construct public housing units that were usually managed by local authorities (CMHC 2011). But, as in the United States, housing policy was largely market-oriented and favored access to homeownership; social rented housing remained residual. Until the 1960s most assistance was directed toward homeowners and private developers and only a very few social housing units were built (Purdy and Kwak 2007). However, alongside the rise of the welfare state, support for social housing increased. The 1964 National Housing Act amendments marked a major turning point, initiating a prime period of social housing that lasted three decades. Social housing expanded tenfold and reached almost 10 percent of new construction. Another important turning point was represented by the National Housing Act of 1973, which brought a shift away from public housing developed by provincial agencies to the support of non-profit operators such as community groups, cooperatives, and municipalities. Furthermore, whereas Canadian housing programs were strongly financed and shaped by the federal government, provincial and municipal governments began to take a more active role in housing during the 1970s (Bacher 1993; Suttor 2016). The mid-1990s brought the end of the heyday of social housing. In 1993 the federal government withdrew from supporting new social housing projects and, in 1996, it transferred the management and funding of existing social housing to the provinces. Since the 2000s there has been a re-engagement, but new social housing construction remains modest (Suttor 2016).

### *Denmark*

Until WWI, the early origins of Danish housing policies had a small-house and self-help orientation (Bro 2008): an 1850 law on agrarian credit for small farmers, the Working Building Association of 1865 for cooperative cottage constructions, and a wave of

building societies with state support in the 1900s (Hyldtoft 1992). From the interwar years onwards (1922), state subsidies also went to housing associations, organized as the *Boligselskabernes Landsforening* from 1919 (Jensen 2013), which provided for collective units not for market sale and protected against conversions. In addition, there were local government housing associations providing public rentals (Jensen 2013, 79), which emerged during WWI. Following WWII, social housing became a core pillar of the welfare state (Vestergaard and Scanlon 2014). The majority of state housing finance went to housing associations – private and autonomous collectively owned organizations which were publicly subsidized and regulated – and to a small extent to municipalities, while a sizable minority went to single-family house subsidies as socialized homeownership. Subsidies also went partly to private rental construction (Jensen 2013, 84). Subsidies shifted from direct loans to state loan guarantees in 1958 and took a strong homeownership turn in the 1960s (Esping-Andersen 1985). From the 1980s, social housing came under economic stress and under repeated attacks from conservative privatization attempts, while the traditional strong ties to the social democratic party became more strenuous. Whereas social housing has continued to grow in recent decades, trends toward residualization have been observable (Bengtsson and Jensen 2020).

### *England and Wales*

Early industrialization and urbanization marked England's housing market. By the mid-nineteenth century, more than half the population lived in urban areas and housing had become a central social issue. Urban housing was characterized by overcrowded dwellings of poor quality. Although national legislation had evolved since the 1840s, the impact of state intervention as well as early initiatives by employers, philanthropic groups, and municipalities remained very limited. Nineteenth-century housing was dominated by the private rental sector (Pooley 1992). World War I marked a turning point toward stronger regulation and housing for the affluent working class improved during the interwar period. Whereas homeownership expanded due to increasing living standards and affordability as well as private sector interests and ideology, the 1919 Housing Act introduced subsidies from central government to local authorities to build municipal housing, which became established as the dominant form of British social housing. The share of private rental housing decreased but remained the most important form of housing (Malpass 2005; Pooley 1992). After the destruction of World War II reconstruction was the main focus and housing was characterized by strong state intervention. Housing policy was shaped at the state level but implemented by the municipalities. In the immediate postwar period, local authorities dominated housing construction. During the 1950s, social housing – mainly built by municipalities and, from the 1960s, to a small but increasing proportion by housing associations – continued to grow but at a slower rate than homeownership, which was provided by private enterprises and favored by housing policies. Overall, the share of the private rental market, which remained subject to various controls, declined sharply in the postwar period. (Donner 2000). The coming to power of the Conservative government under Margaret

Thatcher in 1979 led to another turning point in housing policy. Less state involvement and more market-oriented solutions became the main priorities. Residential investment programs were scaled back and local authorities were encouraged to sell off council housing. The “Right to Buy” (1980) incentivized the purchase of public housing by tenants. Subsequently, owner occupation became the main form of tenure. The share of council housing dropped significantly and public housing has been residualized (Balchin 1996; Malpass 2005).

### *Finland*

Finnish social reformers followed general European trends in backing a first law supporting workers’ housing projects financially in 1898 (Ruonavaara 2006, 288). In the interwar years, the policy of state credits for municipal housing companies, non-profit, and individual housebuilders was continued to combat shortages, peaking in the foundation of a state housing mortgage bank in 1927 (Ruonavaara 2006, 289). Finnish housing policy has had a strong homeownership focus, from early on in favor of farmers or rural settlers (Ruonavaara 1999). In 1925, the shared-ownership-company law was passed which, however, did not develop into state-supported cooperatives as in other Nordic countries. The state temporarily supported non-profit housing between 1920 and 1926 to cope with the housing crisis (Ruonavaara 2006), but then returned to loans-to-homebuyers programs. Starting in 1944, public loans could also go to non-profits and municipalities to support public rental construction through the state mortgage bank Arava, preparing the ground for postwar social housing constructions. In the postwar reconstruction the public-rental share in Avara-supported construction peaked at 39 percent in the late 1960s (Ruonavaara 2006, 308), while rentals have become the prevailing recipient of total state subsidies. Since the 1980s, direct building subsidies were gradually replaced by tax incentives and social housing was re-directed to lower-income groups and became somewhat stigmatized (Ruonavaara 2006, 321).

### *France*

After some housing philanthropy by employers and under Napoleon III since the 1830s and 1850s, the *loi Siegfried* of 1894 followed the Belgian model (Guerrand 1987; Topalov 1987),<sup>4</sup> followed by the *loi Strauss* 1906 and *loi Ribot* 1908.<sup>5</sup> These first housing laws aimed at social homeownership, i.e., state credit help to move into homeownership (Frouard 2012), but equally provided cooperative and private builders for rentals with state subsidies. The 1912 *loi Bonnevey* also allowed municipalities and provinces to establish public bodies for state construction of public rentals. In the interwar years, the

4 Loi du 30 novembre 1894 dite Siegfried relative aux “habitations a bon marché.”

5 Loi du 12 avril 1906 modification et complement a la loi du 30 novembre 1894, qu'elle abroge et remplace and Loi du 10 avril 1908 relative à la propriété et aux maisons à bon marché.

1928 *loi Loucheur* extended the homeownership program to the middle classes (Stébé 1998).<sup>6</sup> The post-WWII housing policy changed the name of the previous public rentals with lowered rent (*habitations bon marché, HBM*) to the current term “HLM” (*habitation à loyer modéré*), public housing with moderate rents, which was meant to address a broad strata of the population. During the peak years of state construction from the 1950s until the 1970s about one-quarter of public housing was in social homeownership programs, the remainder being public rentals (Stébé 1998). These were considerably cut back in the Barre reforms of 1977 (Bourdieu 2000) and afterwards (Zittoun 2001), when indirect subsidies increasingly exceeded direct ones (Pollard 2011). A special levy on salaries in 1952 furthermore institutionalized a special circuit of employers’ housing, the so-called 1 percent *logement* contribution, and private rental construction was subsidized through fiscal exemptions in the postwar years (Effosse 2003). In determining social housing, we follow the broad HLM definition which refers to public rentals that can be offered by an array of different institutional carriers, both public, cooperative, and private. French direct subsidy schemes tend to proliferate, with every government adding a temporary layer to existing ones. Social housing receives a number of different subsidies in addition to the direct ones, such as a partial exemption from VAT and land taxation, advantageous interest rates at the state savings bank (CDC), while social tenants can file for housing allowances (Driant 2009, 74). Over time, state expenses for social housing have been reduced in favor of support for homeownership and the private rental sector (Mouillart 1995). Yet, French social housing still accounts for about one-fifth of the housing stock, often situated on the outskirts of cities and, despite universalist ambitions even guaranteed by an “opposable right” to housing since 1990 (and again 2007), it attracts more lower-income groups (Scanlon and Whitehead 2011).

#### *Germany (West, total)*

The implicit beginning of German social housing policy is the 1889 social insurance law which allowed parts of the accumulated funds to be invested in non-profit housing for the benefit of the insured workingmen.<sup>7</sup> This was extended to cover the newly insured employees in 1911 (Wilke 2020). While there was philanthropic, employers, state employee, and municipal housing and some individual state laws before 1918 (Kholodilin 2017; Krabbe 1984; von Saldern 1979), it was not until then that the much postponed first Prussian and then national housing law was implemented (Niethammer 1988). In the Weimar years, the *Hauszinssteuer* regime linked below-market state credit financed by a special tax to the construction of social rentals and social homeownership by specialized non-profit associations.<sup>8</sup> With the housing laws of the post-WWII era (1950,

6 Loi du 13 juillet 1928 établissant un programme de construction d’habitations à bon marché et de logements en vue de remédier à la crise de l’habitation.

7 Gesetz betreffend die Invaliditäts- und Altersversicherung vom 21. Juni 1889.

8 Deutsches Reichsgesetz über die Erhebung einer Abgabe zur Förderung des Wohnungsbaues. Vom 26. Juni 1921/6. März 1922.

1956), social housing was not only public rental and social homeownership tied to non-profit housing companies and cooperatives, but also included units privately constructed with state aid whose rents were set below market during the mortgage maturation period (Schulz 1994). After the duration of the state aid was over, the social dwellings could be let without limitations to everybody at market rents. With the collapse of the largest and union-owned non-profit housing association *Neue Heimat* in the 1980s, the abolition of tax privileges for the non-profits in 1990, and the sale of municipally owned social housing stock in the 2000s, some classical pillars of social housing provision were eroded. From the 1980s until 2006, the federal level retreated from public housing competencies almost completely such that public housing numbers are the sum of state-level constructions and micro survey data are a more reliable time series measurement of how many social housing units still make up the stock. The numbers are, however, in line with political inquiries about the social housing state of affairs (Bundestag 2012).

### *Germany (East)*

The East-German housing model largely followed the Soviet model: a relatively large share of private price-controlled rentals was augmented by state housing and state-company controlled cooperatives (Buck 2004; Topfstedt 1999). Standardized panel construction of public or cooperative rentals made up a growing majority of the new production, with a small owner-occupier stream emerging in the 1970s. If below-market rent is the criterion for public housing, then only the small homeownership sector (about 21 percent in 1989) was not public (Destatis 1994). In the less narrow definition used here, we leave out the private rental sector and only count public or cooperative rentals. After reunification, the GDR was the only post-Soviet state to *not* completely privatize its formerly public stock such that the East-German social housing stock remained above Western levels. We approximate the social housing levels on East-German territory after 1990 by drawing on micro survey data.

### *Greece*

Until World War I, the Greek housing market was characterized by *laissez-faire* policies, unplanned development, speculative construction, and self-built housing. Despite precarious conditions and overcrowding, public, philanthropic, or employer initiatives toward workers' housing remained almost totally absent. World War I led to more active state involvement, restructuring programs and, most importantly, the refugee settlement in 1922 following the military defeat in Asia Minor. Land was redistributed to new farmers and peasant-proprietors, new settlements were created, and "ruralization" took place. In urban areas, segregation increased with locating refugees outside the inner cities and the state supporting the bourgeois cooperative movement. However, after World War II, *laissez-faire* housing policies characterized by non-intervention were largely re-established (Leontidou 1992). Planning laws had little impact, and housing

was characterized by small-scale land ownership, (often illegal) self-building, and high homeownership rates ranging from 70 to 80 percent. In 1954, the *Organismis Ergatikis Katoikas* OEK was founded, which granted assistance and loans for homeownership. In 1976, the *Dimosia Epicheirisi Poledomias Stegasis* DEPOS was established, which built a few social housing units per year. However, until 1989, hardly any public social housing existed, and the sector remains insignificant until today. Private rental housing was subject to rent restrictions, which were abolished in 1996 (Donner 2000). Since the 2000s, Greek housing policy has changed significantly due to European integration and the Financial Crisis, liberalization and financialization, and housing conditions have worsened (Siatitsa, Maloutas, and Balampanidis 2020).

### *Ireland*

Despite having been part of the United Kingdom, Ireland remained an agricultural country into the 20th century. Poverty was widespread and housing conditions were precarious in rural and urban areas (Allen 1992). Early Irish housing policy was shaped by its ties to Great Britain (Fraser 1996). But, as Norris (2016b) argues, land reforms in the last third of the nineteenth century marked the beginning of a distinctive Irish property-based welfare system with significant redistribution of land and homeownership at its core and which was based on familiaristic ideology and strongly influenced by rural society, religion, and nationalism. By 1870, the majority of farmland was owned by a few British-oriented protestant landlords. In the following decades, various land laws (1870, 1881, 1903, and 1907) brought about a substantial transfer to tenant farmers, creating a large class of landowning peasants. Furthermore, the 1880s saw the beginning of an early and strong promotion of social housing for the rural working class (1881 Land Act). On the other hand, support for urban social housing was not introduced until 1908, and initiatives by employers and philanthropic associations remained modest. The main providers of social housing have been local authorities (Allen 1992). Norris (2016b) considers the years after the independence of Ireland in 1922 as the beginning of a “socialized homeownership system” that gave broad classes of the population access to homeownership. Support for owner occupation was further expanded after World War II and the share of homeownership developed into one of the highest in Western Europe. Simultaneously, at the expense of the private rental market, the 1930s to the mid-1950s represented the heyday of social rented housing, whose share peaked in 1961 at 18.6 percent. This proportion was nevertheless rather low by European standards. This was largely due to the Laborers’ Act of 1936, which made the sale of rural social housing to former tenants far below market price an important instrument for promoting homeownership. The crisis since the 1970s marked a turning point in housing policy and led to deterioration of the socialized homeownership regime in the late 1980s (Norris 2016b). Further development was characterized by marketization and financialization. During the Celtic tiger boom between 1991 and 2006, the private rental market returned strongly, whereas construction of owner-occupied and social housing decreased. Furthermore, housing associations became increasingly significant providers alongside local authorities (Redmond and Norris 2007).

*Japan*

In Japan, the governmental support of social housing started relatively late in the context of “modernization,” economic growth, and strong residential construction following World War II. The first law regulating state help was the Public Housing Act No. 193 of 1951 that authorized local governments to construct public rental houses for low-income people and supported them by providing subsidies both to build and maintain these houses (Hirayama and Ronald 2007).<sup>9</sup> The act constituted one of three pillars of housing policy introduced by the Japanese government after World War II to address the severe housing shortage. Homeownership promotion was the first and most important pillar, which was introduced by the Government Housing Loan Corporation Act of 1950 and the granting of long-term loans with low interest rates.<sup>10</sup> The third pillar was introduced by the Japan Housing Corporation Act of 1955 and the establishment of the Japan Housing Corporation which developed affordable housing in large cities.<sup>11</sup> Japanese housing provision schemes followed their own development path, being embedded in the broader project to stabilize the economy and family structures and only partially paralleling Western models. Companies played an important role alongside state authorities by providing access to both owner-occupied and rental dwellings for numerous employees. Overall, homeownership promotion reigned, whereas social rented housing remained residual, being marginalized by the mixed housing welfare of both public policy which favored middle class homeownership and the private welfare provision of the large companies. By 1971, public rented housing accounted for 4.9 percent and rented company housing for 6.4 percent (Mori 2017). Since the economic crisis of the 1990s, the destabilization of the broad middle class, and the cut back of public subsidies, the once strong links between economic growth, family welfare, and housing policy have been weakened. Alongside this, in the wake of deregulation and market liberalization, the importance of public and company housing declined significantly (Hirayama and Ronald 2007). Since the mid-1990s, the neoliberal policy turn brought about a sequence of transformations and reorganizations in the Japanese social housing system aiming for expanding the market-based housing. The Japan Housing Corporation was gradually reorganized into a semi-public agency, Urban Renaissance (UR) in 2004. The abolition of the Government Housing Loan Corporation (GHLC) in 2007 became a watershed in the history of postwar housing policy. With the enactment of the 2007 Housing Safety Net Law, the historically marginalized social rented housing sector for low-income groups has been further residualized. One of the most recent examples of regional devolution in public housing was the pre-Olympic urban renewal in Tokyo in 2016 conducted by Tokyo Metropolitan Government (TMG) in cooperation with the private sector (Mori 2017).

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9 「公営住宅法」(昭和26年法律第193号).

10 住宅金融公庫法(昭和25年法律156号).

11 「日本住宅公団法」(昭和30年法律第53号)1955年(昭和30)7月8日.

### *Spain*

Spain's first social housing activity, as elaborated by the *Instituto de reformas sociales* in the 1900s, resembled the Belgian and French examples of state-supported help for self-help social homeownership of workers: the first law on the "casas baratas" of 1911 allows state credit institutions to give out favorable mortgages for these projects (Correa 2003).<sup>12</sup> This also includes the construction of social-Catholic associations for homeownership of middle classes with state help. It was prolonged in a law of 1939 which also provided for rental housing by public developers, cooperatives, or municipalities. The subsequent housing laws rather continue subsidy schemes for private developers in their construction of owner-occupier units for the (lower) middle classes in horizontal homeownership, such as Franco's 1939 law on "viviendas protegidas," the 1944 law on "viviendas bonificadas," and the 1954 law on "viviendas de renta limitada" (Vaz 2013).<sup>13</sup> Generous bonus systems for private developers of owner-occupied flats contrast with less generous ones for public developers of limited public rentals. Post-Francoist legislation since 1978 regionalized housing policy, but autonomous regions often struggled in fulfilling this role (Cortés Alcalá 1995). Large subsidy schemes were still oriented toward homeownership promotion, and they were often driven by cyclical rather than housing policy objectives. Whereas social rental housing (most important in Madrid) accounted for only a very small share of subsidies ("vivienda de protección"), the government intervened heavily in the private rental market through rent regulation. This resulted in a sharp decline in the market rental sector from about 50 percent in 1950 to about 10 percent in 2010 (Alberdi 2014; Pareja-Eastaway and Sánchez-Martínez 2014). Spain, where real estate used to account for a large share of GDP, was hit hard by the Financial Crisis in terms of both housing and the economy. Since then, Spain's conception of social housing as social homeownership rather than social renting has been increasingly questioned. New bottom-up organizations have emerged, but the very small social rented sector is still dominated by local and regional authorities (Pareja-Eastaway and Sánchez-Martínez 2017).

### *Iceland*

The first law on Workers' Dwellings was passed in 1929 in the wake of a first social democratic moment and was a social-homeownership program (Sveinsson 2000).<sup>14</sup> During WWII, the municipality of Reykjavik started to eliminate unhealthy housing and create

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12 Ley de casas baratas of 12th of June 1911.

13 Ley estableciendo un regimen de protección a la vivienda de renta reducida y creando un Instituto Nacional de la Vivienda encargado de su aplicación of 19th of April 1939; Ley sobre reducción de contribuciones e impuestos en la construcción de casas de renta para la denominada "clase media" of 25th of November 1944; and Decreto-ley de 14 de mayo de 1954 por el que se encarga al Instituto Nacional de la Vivienda la ordenación de un plan de viviendas de "tipo social" of 14th of May 1954.

14 Lög um verkamannabústaði, 18. maí 1929.

a small municipal housing stock, which did not start to grow until the 1970s when a social housing plan included the construction of 1,000 public rental flats. In the 1980s, housing associations received the same state credit rights to build social housing as municipalities (Rannsóknarnefnd-Alþingis 2013). Most of it was constructed in Reykjavik, where, in 1997, the city of Reykjavik founded its own social housing company, *Félagsbústaðir*. Whereas social homeownership units have accumulated into a sizable part of the housing stock (6–7 percent in peak years of the 1990s), public municipal rentals are still a minor phenomenon (Sveinsson 2006).

### *Netherlands*

The private rental market and miserable housing conditions characterized the urbanization of the nineteenth-century Netherlands. During this period, the first few social housing units were built by employers, local authorities, and philanthropic associations. The Housing Act of 1901 marked the beginning of state intervention.<sup>15</sup> The legislation introduced a variety of instruments to improve the quality of housing as well as subsidies for non-profit housing. Eligible beneficiaries were local authorities and so-called housing associations. The latter were private institutions under the supervision of public authorities. The impact remained limited for the time being, but after World War I, social housing construction became dominant for a short period due to large subsidies for non-profit housing. However, as a result of the economic crises, contributions were again sharply reduced from the mid-1920s (Prak and Priemus 1992). It was only after World War II that social housing was again supported in large quantities. Postwar housing policy centered on the construction of social housing, often large-scale projects. There were subsidy arrangements for both the social and the market sector, but the housing associations were the main beneficiaries of the subsidies. Furthermore, rents have been regulated in the wake of World War I, again since the 1940s, and still are today. Postwar policy gave rise to the heyday of social rented housing, whose shares increased strongly until the mid-1970s. Starting from this period, the share of social housing stagnated and finally declined, especially from the 1990s onward. Homeownership and market solutions gained in importance, decentralization and deregulation took place, and subsidies were reduced and finally abolished in 1995. During the 2000s, the share of social housing has continued to decline (Beekers 2012; Haffner et al. 2009).

### *Norway*

First housing policies existed on the municipal level in Oslo or Bergen and the interwar years saw the origins of both owner-cooperative and municipal public rental housing (Annaniassen 2006). The first housing law in 1910 only concerned Oslo and led to considerable construction activity by the municipally owned housing company (Annaniassen

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15 Wet van 22 juni 1901 houdende wettelijke bepalingen betreffende de volkshuisvesting.

sen 2006, 209). In the interwar years, the locally supported cooperative organizations became the main housing initiative (Sørvoll 2014). Other than a small rural housing bank set up in 1915, it was not until the setting up of the Norwegian state housing bank in 1946 that the federal government started subsidizing housing construction on a large scale, mainly directed at cooperative constructions. Contrary to Sweden, Norwegian housing policy took the path of subsidizing cooperative housing – a form of homeownership – as the dominant state-supported tenure, with public rentals only as a residual category (Sørvoll 2014), not even figuring in public tenure statistics, which is why we have to rely on first survey data since 1970. Cooperative members themselves increasingly felt like owners, with membership share prices approximating market prices since the 1970s (Annaniassen 2006, 235), which is why they remain outside of our social housing definition. In the 2000s, the government reactivated the non-commercial municipal rental sector in light of rising mortgage costs and house prices (Annaniassen 2006, 251).

### *Poland*

In Poland, a foundation for the public support of social housing was laid down soon after independence, in the Act on the Establishment of the State Housing Fund (*Państwowy Fundusz Mieszkaniowy*) of August 1, 1919. Its objective was to support the construction of small, cheap, and sanitary housing for “poor people, mainly for war invalids, for widows and orphans of fallen soldiers, and for poor working and clerical families with numerous offspring.” Furthermore, the Act of April 29, 1925 on the expansion of cities and the ordinance of the President of the Republic of Poland of April 22, 1927 on the expansion of cities imposed on city boards the obligation to improve housing relations, primarily by building small apartments for medium and low-income families (Korzeniewski 2009). Prior to 1960, the data on housing stock were only available for the urban areas. Moreover, the official statistics covered only buildings, but not dwellings. During the Socialist era, the housing stock was made up of five components: municipal dwellings (*mieszkania w budynkach rad narodowych*), housing cooperatives (*spółdzielnia budownictwa mieszkaniowego*), other socialized units (*pozostałych jednostek uspołecznionych*), private persons (*osób prywatnych*), and other units (*innych jednostek*). Although the official statistics included the housing cooperatives in the socialized housing stock, they cannot really be treated as state property. Even at the highpoint of the Socialist period, private dwellings dominated: For example, in 1970, their share in the total number of dwellings exceeded 57 percent. They were immediately followed by the municipal dwellings that accounted for more than 22 percent, and then by other socialized units (about 13 percent), and housing cooperatives (less than 7 percent). After the fall of the Socialist system, the state housing stock was first transferred to the local government (*gminy*) and then to a large extent privatized by selling the dwellings to their tenants (Lux 2001). The housing stock remaining in the hands of local government thus represents the social housing. The rents there are set as a percentage of the replacement value of dwellings (Lux 2001, 199). In 1995, a new form of social housing operator was established – these are social housing associations (*Towarzystwa Budownictwa*

*Spolecznego*) that are responsible for the construction and operation of new housing dwellings (Lux 2001). The social housing sector is categorized into two groups: narrowly defined social housing that is focused on households in the 1st and 2nd income deciles and affordable housing catering for the needs of households in the 3rd and 7th income deciles (Czischke and van Bortel 2018).

### *Scotland*

Scotland's close connection with England led to early industrialization and urbanization. Scottish urban formation was characterized by – unlike in the rest of the UK – high rise tenements of four to five stories and by overcrowded, insanitary, and small dwellings. As in other countries, by the end of the nineteenth century housing reports were addressing the disastrous conditions and demands for housing improvements grew. There were initiatives from philanthropic associations, cooperatives, building societies, employers, and local authorities for low-income housing since the nineteenth century and housing had become an important electoral issue for the Labour Party before 1914. However, by 1913 private landlords still reigned and social housing was insignificant. As elsewhere, it was World War I that had a catalytic effect in a period of social unrest. In 1919, a council housing program was introduced and during the interwar period – in reverse ratio to England – seven out of ten new dwellings were built by local authorities. Furthermore, rent controls were more stringent than in England (Rodger 1992). World War II brought an end to the housing programs. However, the Labour government, triumphant in the elections, reintroduced a large housing program in 1945. By the late 1960s, local authorities and housing associations provided around half of all dwellings and social housing had become the dominant form of housing in Scotland (Robertson and Serpa 2014; Rodger 1992). The heyday of new social housing construction ended during the financial crises in the late 1960s and the 1970s due to cutbacks in public expenditure. Since the 1980s the social housing stock has declined dramatically. Housing policy was undergoing a major turnaround. The “Right to Buy” for former tenants of council housing reduced the stock owned by local authorities and the Conservative government began to promote housing associations as an alternative to public housing. At the same time, owner occupation increased rapidly as a result of council housing sales and easier access to mortgage finance (Robertson and Serpa 2014). Since the 2000s and in the wake of austerity policies after the Financial Crisis, social housing became further residualized, whereas the private rented sector underwent a strong reemergence. Today, council housing, housing associations, and private landlords have a similar share of the housing market, while nearly two-thirds of all housing is homeownership (Gibb 2021).

### *Singapore*

In most of the developed Western countries, the term “public housing” refers to “subsidized rental housing provided by the government to low-income households who are

unable to afford minimum standard housing at market rental rates” (Phang 2018, 27). In Singapore’s local terminology, social housing refers to subsidized rental housing provided by the Housing and Development Board (HDB). This form of public housing in Singapore can be traced back to the formation of the Singapore Improvement Trust (SIT) in 1927 by the British colonial administration. The SIT’s primary function was aimed at infrastructure and general improvement projects such as the construction of back lanes. It was not until 1932 that the SIT was mandated to build houses for renting to low-income families. In 1936, the SIT started the first public housing scheme at Tiong Bahru, which marked a significant transition in governmental efforts from onsite improvement schemes to more comprehensive public housing schemes (UN-Habitat 2020, 3). After the Second World War, the SIT began to focus on public housing provision in response to the worsening postwar housing shortage, completing 20,907 units between 1947 and 1955, which housed 9 percent of the population by the end of 1959 (UN-Habitat 2020, 4). In 1959, Singapore achieved self-government with the People’s Action Party (PAP) in power. Under the Housing and Development Act 1959, the SIT was replaced by the HDB in February 1960, which initially focused on providing rental housing to the low-income group. Through effective implementation of the First and Second Five-Year Building Programs between 1960 and 1970, the HDB had completed 120,669 dwelling units, housing 34.6 percent of the total population (HDB 1970). However, the model of public housing soon started to change when the Minister for National Development launched a Homeownership for the People Scheme in 1964 as a national agenda to encourage Singapore citizens to purchase residential flats on a 99-year leasehold basis (HDB 1964). After the reform of the Central Provident Fund (CPF) in 1968, a “closed circuit” of public housing funding and consumption took shape through making it possible to withdraw part of the compulsory social security savings for mortgage financing (Beng-Haut 1997, 22). For over half a century, the homeownership project continued in various forms and reshaped the structure of the public housing system in Singapore completely. The share of homeownership HDB flats skyrocketed from 6.7 percent in 1967 to 94 percent in 2018, while the percentage of the population living in HDB public housing kept growing from 25.9 percent in 1967 (Statistics 1978, 8), which peaked at 87 percent in the early 1990s and has been stabilized around 80 percent since 2018 (Statistics 2019, 143). The great success of public housing also contributed to GDP expansion and relatively low-price inflation in Singapore (Ho 2021, 24–25). Though overshadowed by the owner-occupied public housing, HDB rental flats still constitute a crucial component of Singapore’s public housing system to secure housing provision for low-income persons (UN-Habitat 2020, 11).

### *Sweden*

Swedish housing policy started as a single-family house movement and law of 1905 in favor of bringing particularly rural workers into more stable ownership to prevent emigration and the lowering of birth rates (Strömberg 1992). This same natalist family-home focus was confirmed in another law of 1935 (Bengtsson 2006, 129). Already in

the interwar years owner-cooperatives (*bostadsrätt*) and municipal public rental housing developed within national legislative frameworks (Bengtsson 2006). After WWII, state support for municipal rentals became a key pillar of Swedish housing policy, even more so than cooperative housing and at the deliberate cost of the private rental sector (Sørvoll 2014). The 1935 order in favor of houses for families with many children (*Barnrikehussatsningen*) had also already established the basic organizational unit of future means-tested public rental housing provision, known as *allmännyttiga bostadsföretag* (non-profit housing company), which the 1947 law *bostadsförsörjningslag* institutionalized, which is what we take as the definition for social housing for Sweden.<sup>16</sup> This path was reinforced in the postwar period by the famous million-homes program of 1965–1974. Housing became a social right and was universally provided to citizens, with citizens unable to pay private rents being provided with rentals by governments subletting to them from public or private housing companies (Bengtsson 2001). Since 2011, Sweden had to cut subsidies to public housing companies in order to comply with EU competition directives, creating a level playing field for private and public companies (Bengtsson 2013). While some municipal housing units were sold to sitting tenants, the sector overall proved rather resilient and continuous without formal means-testing (Blackwell and Bengtsson 2021), but *de facto* becoming more selective in choosing tenants and hence residualizing despite a universalistic housing discourse (Grander 2017).

### Switzerland

In the nineteenth century, employers and philanthropic associations built first workers' housing, and by the end of the century there were the first attempts to promote municipal housing and housing cooperatives (Walter 1994). During World War I, the federal government made its first major intervention in the housing market and from 1919 onward it supported private and social housing construction. These subsidies led to the first boom in social rental housing, with non-profit housing cooperatives becoming the most important providers. Federal measures were fully dismantled by the mid-1920s. Although some cantons and municipalities continued supporting social housing on their own, local subsidies were suppressed in the early 1930s amid the Great Depression. (Kurz 1993; Zitelmann 2018). The outbreak of World War II led to renewed federal interventions and in 1942 the federal state launched a housing program to support private and social housing. At its peak, two-thirds of new construction was subsidized. The federal funding led to the second heyday of cooperative housing construction. However, in 1950, the prolongation of housing subsidies was rejected by the electorate at the ballot box. With the end of federal support, the majority of cantons and municipalities likewise reduced subsidies. From 1958 onward, housing construction was again supported by the federal authorities with moderate subsidies. But the private rental market dominated the housing construction boom of the postwar era. Both social housing and

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16 Lag (1947, 523) om kommunala åtgärder till bostadsförsörjningens främjande m.m. of 10th of July 1947.

support for homeownership remained weak (Müller 2021). The Housing Act of 1974 represented a turning point.<sup>17</sup> The legislation reinforced market-oriented solutions and introduced a federal homeownership promotion program, while (modest) support for private and social rental housing was continued (Cuennet, Favarger, and Thalmann 2002). In 2001, federal subsidies under the 1974 Act were discontinued. Regional subsidy programs still exist, and since the 2010s various successful local political initiatives have been submitted. But overall, support for social housing remains residual.

### USA

Despite some philanthropic ventures, the creation of a few wartime housing units during World War I, and the allocation of some public funds to housing construction in the early 1930s, public housing did not take form until President Franklin D. Roosevelt's New Deal legislation that introduced major interventions in the depressed housing market (Purdy and Kwak 2007). The United States Housing Act of 1937 established the United States Housing Authority and a decentralized subsidy scheme. Federal funds were transferred to local authorities, which were required to plan, construct, manage, and maintain public housing projects (Radford 1996). Housing legislation initiated in the 1930s further expanded after WWII. Public housing programs were continued in the postwar period (Housing Act of 1949, Housing and Redevelopment Acts of 1965 and 1968), and from 1954 private operators were also supported, to provide housing for low-income households (Szylyan 2018). However, social housing remained residual; interventions centered on homeownership. Legislation encouraged speculative housing construction and suburbanization, and reinforced religious, social, ethnic, and racial segregation. The policies were fundamentally aimed at promoting white middle class homeownership, while comprehensive social housing construction was successfully combated by the private housing industry (Jackson 1987). From the 1960s and especially the 1970s, there was a shift toward public-private partnerships. Tax credits and housing vouchers largely replaced public housing programs by promoting private developers (The Housing and Community Development Act of 1974, Low Income Housing Tax Credit (LIHCT) 1986, HOPE VI 1992). These developments, which continue to this day, were accompanied by a deterioration in public housing (Hunt 2018).

### USSR

In 1918, the communist government of Russia started to expropriate private housing stock into state or municipal ownership.<sup>18</sup> According to some estimates, by the end of that year about 25 percent of the housing stock was nationalized (Belousov and Larin 1930).

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17 Wohnbau- und Eigentumsförderungsgesetz (WEG) vom 4. Oktober 1974.

18 The decree of August 20, 1918, prescribed the nationalization of houses with the value exceeding a certain threshold to be determined by the local authorities in all cities with the population

In the 1920s, cooperative ownership became another ownership form. Moreover, the housing stock the state-owned enterprises provided to their employees played a major role. The concentration of housing in the hands of both the government and state-owned enterprises permitted the authorities to exert strict control over citizens, threatening homelessness for deviating behavior at the workplace (Meerovich 2005). In the USSR, the official statistics typically measured housing in terms of square meters of the total surface. Therefore, all estimates of the ownership structure of the housing stock prior to 1991 are based on the ratios of surfaces. For this reason, the indicator of social housing in the former Soviet republics here is defined as the surface of all public housing to the total housing stock in square meters. Compared to the estimates for other countries, which are based on the number of dwellings, the estimates for the republics of the former USSR can undervalue the extent of social housing because the surface of public dwellings on average can be smaller than that of the private dwellings. Moreover, until 1980, only the data on the urban housing stock are available. The general trend from 1918 through 1991 was toward the increasing share of the public housing stock. The Baltics did not pass interwar housing laws, Estonia excepted in 1922 (Norkus, Morkevičius, and Markevičiūtė 2021). After World War II, there was a partial revival of the private housing sector, since the government aiming at the rapid reconstruction of a heavily war damaged housing stock stimulated any efforts in this direction. The easiest and fastest way was the construction of single-family houses by private persons using any building materials they could find, including debris from the bombed-out buildings. However, in 1959, a large-scale construction of public multi-family houses started that led to a rapid increase in the proportion of public housing.<sup>19</sup> A radical change came in 1991 when, in the framework of the total liberalization of the economy, it was decided to privatize state-owned housing.<sup>20</sup> The privatization was carried out virtually for free. Therefore, within the space of several years millions of Russian citizens privatized the public dwellings in which they had previously lived as tenants. On the positive side, this allowed them to become homeowners having real estate. On the negative side, many of them became owners of single rooms and not even entire apartments due to the existence of a widespread phenomenon of the so-called *kommunalki*, that is, apartments shared by several (in extreme cases by dozens) families. Moreover, both the land under the building, the building itself, and some not-yet-privatized dwellings and rooms remained state property, thus complicating the issues related to the maintenance and refurbishment of the building. Currently, social housing in Russia is considered to be entirely the responsibility of the state. There are no privately-owned social dwellings. Under the so-called contracts of social rental

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of 10,000 persons and more (Декрет ВЦИК “Об отмене права частной собственности на недвижимость в городах”).

19 Resolution of the Council of Ministers of the RSFSR N 1184 of July 9, 1959, on measures to promote the collective construction of multi-apartment and one-family individual residential buildings (Постановление Совета министров РСФСР № 1184 о мерах содействия коллективному строительству многоквартирных и одноквартирных индивидуальных жилых домов).

20 Law on the privatization of the housing stock in the Russian Federation of July 4, 1991 (Закон РФ “О приватизации жилищного фонда в Российской Федерации” от 04.07.1991 № 1541-1).

(*sotsial'nyi naym*), specific categories of the population (low-income households living in the poor-quality housing) are eligible to be included in the special waiting lists and to eventually obtain state-owned premises.<sup>21</sup>

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21 The social public housing is regulated by chapter 8 of the Housing Code of the Russian Federation of December 19, 2004 ("Жилищный кодекс Российской Федерации" № 188-ФЗ).

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