

European Journal of Housing Policy 1(3), 2001, 445-447

## REVIEW

Christian Donner (2000) *Housing Policies in the European Union*.

Vienna: Christian Donner. 566 pp. € 80. ISBN 3-9500417-4-5.

This book by Dr Donner can be fairly described as monumental, both literally and figuratively. In the literal sense the text is 566 pages long (almost A4 size, double-column printed), plus 37 pages of introduction, tables of contents and annexes. In the figurative sense it is monumental in that it comprises monographs on average 26 pages long about housing in each of the fifteen European Union countries, 3-4-page 'country reviews' of each country, and at the beginning of the book 92 pages on 'The Theory of Housing'. Dr Donner writes that the work took him nearly four years, and was funded by the Austrian Federal Ministry of Economy and Labour. The result is, to the reviewer's knowledge, unique. Nowhere else is there to be found within one volume, or even a series, such broad coverage of housing circumstances and policies in all fifteen of the EU countries.

Dr Donner says that he wrote first drafts of the country monographs himself, from documentary data plus interviews in all of the countries, mostly with housing specialists in universities and research institutes. These drafts were then sent to be read by one, two or three housing specialists in each country, often but not always among those previously interviewed. The monographs nevertheless are very much Dr Donner's work, and hence can be addressed to the same issues in each country, from the same point of and view. All too often country monographs are written from the viewpoint of the individual countries and so do not engage with each other. By writing all fifteen monographs himself Dr Donner has avoided this hazard: the structure and content of the monographs follow a common pattern which adds greatly to their usefulness. To write all the monographs in this way Dr Donner would have had to master enough of the detail about housing in each country. This he has clearly succeeded in doing. He was evidently helped by the amount written in each country about housing; secondary sources appear (from the Bibliography) to have provided most of what he needed, without having to find his way round the detail of official statistics. In some instances he appears to have been aided by existing comparative studies, for instance G. McCrone and M. Stephens, *Housing Policy in Britain and Europe*, London, 1995, which is a source cited in connection with income-related assistance with rents in Germany (Wohngeld).

There are two main potential uses for a multi-country study of housing circumstances and policies: as a reference source for information about the housing system and housing finance in the individual countries; and for comparisons between countries of problems, solutions and policies. Only very rarely are policies and policy instruments directly transferable between countries. But comparisons can be a valuable source of insights about one's own country and of ideas that are worth thinking about. That similar problems have arisen in other countries counts against explanations that are unique to one's own country. That large housing estates have proved difficult to manage in Germany and France as well as in Britain (A. Power, *Estates on the Edge: The Social Consequences of Mass Housing in Northern Europe*, London, 1998 - included in Donner's references) casts doubt on explanations of such problems in Britain solely in terms of mistaken policies by British central and local governments.

For the first purpose, descriptive detail for use as a reference source, the information provided by Dr Donner is as comprehensive as is possible within the space available, and the topics are well selected. Statistics of the growth of population and the numbers of households, and of the housing stock in total and by tenure, are provided, together with commentary. The system of housing finance is described, with some information about its evolution. Also described are subsidies for rented housing and the tax treatment of owner-occupied housing. The timeliness of the statistical and other information inevitably varies. In part this is the consequence of intervals between

censuses and between housing surveys, but it is also in some places the result of using secondary sources. In the Swedish monograph the reference to what is 'currently' the rate for mortgage interest tax relief (p. 431) is attributed to the European Mortgage Federation (1997). Whether this work was up-to-date as of 1997 is not known. The sheer size of the task that Dr Donner undertook made use of secondary sources inevitable however. Nevertheless the sections in each country monograph on the tax treatment of owner-occupation and the private rented sector warrant particular mention. Someone who wishes to know which countries among the fifteen have tax relief on mortgage interest or an equivalent subsidy will find the answer in section 3.6 of the country monographs, together with explanatory comment on how it has been modified in recent years. Also to be found are whether the rental value of owner-occupied housing is taxed, and whether purchases and sales of houses are taxed. The local property tax as applied to housing is also described, as is VAT on housing, though curiously no mention is made of purchases of houses and rents being exempt in Britain. The reviewer was struck by how prevalent in the EU countries are fiscal aids for owner-occupation. Some countries have reduced them (Netherlands, Sweden) or restructured them (Germany), but none have gone as far as Britain in abolishing mortgage interest tax relief and putting nothing in its place.

For comment on the accuracy of fine detail the reviewer is necessarily restricted to the monograph on his own country. The standard of accuracy is in general high. There are perhaps inevitably some minor slips, for instance the reference (p. 448) to the '1915 War Restrictions Act' which is more usually known as the Rent Restriction Act (full title 'Increase of Rent and Mortgage Interest (War Restrictions) Act'); and 'The Housing Act of 1961 introduced marked rents for private housing' (p. 119) - the reference should be (with qualifications) to the Rent Act 1957. Also present are expressions of opinion rather than fact presumably picked up from the sources cited such as (on p. 448) 'Within the capitalist framework preference was given to industrial capital over landed capital by assuring low wages based on low rents (rent control)'.

Drawing convincingly argued conclusions from the housing policies and circumstances in the fifteen countries would have added very substantially to the length of the work and the time required. Dr Donner's conclusion (Part D, pp. 541-57) is not really of this kind. It is, as he acknowledges, derived from previous studies by him of housing issues in Austria, with further thoughts from his work in the other EU countries. Housing is a field that is among the least suited to EU-wide policy recommendations: the chance of one size fitting all is remote.

A final comment is that Dr Donner's book might have been made more reader-friendly to the English-language reader if all the chapters had been read in draft by housing specialists whose native language is English. What is meant, for example, by an 'object' subsidy in the monograph on Germany can be worked out from the context by someone not familiar with the term, but an English expression could be more helpful; likewise the use of the term 'promoter' where English usage would have 'developer'.

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