Homeowner Nations or Nations of Tenants. How Historical Institutions in Urban Politics, Housing Finance and Construction Set Germany, France and the US on Different Housing Paths

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"All sociology worthy of the name is 'historical sociology'." (Mills 1959:146)

"[…] our evolving cities are still governed by the ways in which earlier occupants of the ground divided their fields or settled their estates, and the centres of commercial gravity if not their circumferences are commonly still fixed where earlier convenience required. Inertia is part of the dynamic of urban change: the structures outlast the people who put them there, and impose constraints on those who have to adapt them later to their own use. The fact is that the framework of growth, however hastily devised, tends to become the permanent structure, and to be held fast by property titles and convenient routines that can seldom be undone at a stroke. […] all amenities whose distribution tended to be settled at an early stage of urban growth – are ineradicable influences on subsequent patterns of urban life. To that extent what happened in the nineteenth century plainly matters still today."(Dyos/Wolff 1973:893-4)

Introduction

A 1972 German documentary called "Once in your lifetime"[1], watched by 27 million Germans or 47% of all TV-viewers (Spiegel 1972; Handelsblatt 2013), tells the story of not too young a couple – he being an industrial engineer in his late thirties – struggling through almost three TV-hours to construct their owner-occupied suburban detached single-family home. It becomes clear that in Hamburg's dense urban area cheap individual building lots are difficult to access for the individual household; the late purchasing date is due to the couple's membership in one of the German savings and loan cooperatives that require considerable ex-ante savings prior to mortgage attribution; city-life as a tenant had moreover been a satisfying alternative; finally, the couple itself has to contract with the many different uncoordinated building trades producing the tailored quality-construction, surpassing by more than six times the buyer's annual income (Wedel/Hoffmann 2002). A 1990s' government-sponsored annual booklet for future homeowners, informing about the strict requirements connected with individual building lots, necessary ex-ante savings and negotiations needed with different artisanal groups show that the couple's story, though possibly overdrawn, reveals some representative and structural features of the institutional background of homeownership in Germany (BRBS 1995). Repeated times does the couple, in its homeowner-odyssey, consider to just remain part of the majority of tenant-households in Germany. The story evidently contrasts with accounts of US-American community constructions such as the famous Levittowns, where a single company offered standardized houses in large unit-numbers on suburban construction land to lower-income households buying home equity thanks to government-guaranteed mortgages of freely lending savings and loans.

[1] Translations from French and German sources are mine throughout the thesis.

These stories illustrate that it is rather about the institutions organizing residential housing markets than individual preferences that matter for what kind of housing people eventually end up with. They offer a glimpse into the more systematic differences in the way that different countries have historically organized their residential housing market. They differ more particularly in the degree to which housing units are occupied by their owners in relation to a country's overall housing stock, a quotient also known as homeownership rate (HR). The overall OECD homeownership trend is generally one of a continuous rise ever since the interwar period. Before the crisis of 2008, whose long-term effects on homeownership development are yet to be seen, there were more people living in their own homes in the developed world than ever before. This trend was accompanied by an increase of the average size of housing units as well as their quality in terms of amenities (bath rooms, own WC and kitchen, water, electricity and sewage supply). Furthermore, housing policies all underwent a transformation from post-war capital subsidies for new construction of rent-restricted units to individual housing allowances, tax exemptions for homeowners and the promotion of a private market for housing capital. This strong prima facie evidence for an overall convergence of housing indicators and policy is equally reflected in the comparative housing literature where a convergence thesis prevails that would predict a gradual elimination of cross-national differences in the housing sector (Kemeny/Lowe 2005).

Given these common overall tendencies and theoretic expectations, it must appear surprising that both homeownership *levels* and the dimension of its *increase* have been far from uniform across countries even of similar economic and urban development. More specifically, as the introductory stories already suggest, there has been a persistent *homeownership gap* in levels between the tenant-dominated German-speaking (and some adjacent) countries and the English-speaking homeownership nations. This motivated housing scholars to group these countries in different housing regime classes (Kemeny 1981; Barlow/Duncan 1994; Schwartz/Seabrooke 2008). In the United States around 1890, for instance, large cities already revealed an average HR of 25% and national rates that grew from a 43,9% minimum in 1940 to a maximum of almost 70% before 2008, whereas large German cities by 1912 had 13% homeowners with the estimated national rate of 26,7 in 1950 reaching 42% in 2000. Moreover, the German-speaking countries were not able to close this gap, motivating the research question of how the level differences came about in the first place and why they were not eliminated by a stronger rate increase in the lagging countries. Posed this way, the question almost necessitates a path dependence explanation of an initial juncture creating differences in HR-level that re-enforcing mechanisms helped to maintain thereafter, and indeed: my overall

explanation will describe a path of different urban housing production regimes set up in 19th-century urbanization and stretching through much of the short 20th-century.

In a nutshell, I will argue that different complementary institutions in city organization, the housing finance and construction industry locked countries into inert physical and institutional structures of either the compact tenement city-form in Germany or the suburbanized form of a city of homes like in the United States. More specifically, functional complementarities of public welfare cities, housing cooperatives, mortgage banks and a craftsmanship production of solid single-unit homes led to the German tenant-dominance, whereas private cities, savings and loans (SLAs) and a Fordist mass production of single-family homes created the American production regime in favor of more accessible homeownership. Though I establish the argument for Germany and the US in historic case studies, the conclusion tries to make plausible that it can be extended to other German- and English-speaking countries.

With respect to time periods, my explanation differs from existing explanations that *either* focus on short-term variations in demographic, mortgage, income, interest-rate or subsidy developments in the last 20 years *or* on the post-war social housing policies and attractive private rental alternatives to be the crucial difference. The former explanation, however, leaves unexplained the great *level*-difference that goes beyond some year-to-year variations, whereas the latter begs the question of why there were level-differences already *before* post-war social and private rental entered the scene. My explanation seeks to account for this level-difference and it argues that institutions in the housing sector pre-determined the kind of housing policies states finally ended up with in the 20th-century. By drawing extensively on existing literature of housing and urban historians, the thesis gives new answers to the homeownership puzzle that has been haunting the comparative housing literature since the late 1970s.

With respect to causal factors, my explanation competes with an explanation that has received considerable credence as of late, known as private Keynesianism or private-debt/public-welfare trade-off. It claims that especially the post-1980 homeownership increases are due to more liberal and extensive private mortgage lending whose state support is part of wider strategy of replacing public welfare with private good provisions. The problem of this explanation for Anglo-German cases is that the absolute differences of residential mortgage volumes in the economies have not been very significant as compared with the huge homeownership gap. My explanation therefore refers to the *composition* of the mortgage finance industry and argues that the rise of American SLAs – versus coveted bonds issuing German mortgage banks and non-profit housing associations – linked mortgage-lending to the special building type of owned family homes.

A final common view that my explanation opposes is that of an American cultural preference for homeownership that is supposed to be absent among Germans. I will argue that such a preference was influential only to the extent that, both in the American *and* the German case, ownership-promoting institutions were successfully set up. Otherwise, I argue, that housing supply institutions provide the rather inert offer that, once set up, socializes people in either one or the other form of dwelling. As the initial story suggests, it were not necessarily individual desires, but institutional obstacles that differed across countries.

If my explanation holds to be true, then propositions about a universal linear path to similar homeownership levels in all nations should be revised and some instrumental knowledge for policy-makers about reinforcing or breaking one or the other trajectory should be generated. More particularly, Anglo-Saxon readers can learn that even beyond the existence of social housing there are crucial and persisting housing differences in other developed nations. But what overall difference should homeownership make other than indicating just a different sort of tenure of otherwise equally equipped housing units? The extent of public debates and concerns about homeownership should already be an indicator denying homeownership's marginality. In the US, for instance, the presidents Clinton and Bush, Jr. announced rates of 67,5% and 5,5 million more low-income homeowners as desirable goals for the short-term (Masnick 2004:315) and, in France, President Sarkozy proclaimed 70% French homeowners to be his ambitious objective (Driant 2009:119). But to highlight the importance the explanandum "homeownership" further, I will briefly give an idea of which other social phenomena are correlated with or even fall into the causal shadow of high HRs.

Historically and again more recently in the financial crisis of 2008, one can observe a link between higher homeownership, higher house price volatility and therefore higher risk of speculative, bursting bubbles. If one correlates HRs of 19 OECD countries around the year 2000 with the percentage change in house prices in 2008 or 2009, the coefficient approaches -0,5 indicating that homeownership countries were hit more severely by the house price bubble and ensuing problems. And this is not an accidental result: for a correlation of the 1990s HRs and the standard deviation of housing prices from 1970-2005 in the same countries, the correlation coefficient is around 0,55 with Germany having a deviation of only 8,35 index number points as compared with those of the UK (37,07) or Spain (35,48). There is similar evidence for rising HRs and speculative subdivision of single-family lots being one of the causes of the Great Depression with its ensuing house price deflation (Brocker/Hanes 2012; Field 1992). The risk of property price bubbles seems much more serious as more people demand more houses and mortgages more frequently with house-price-mortgage-debt spirals lurking.

Homeownership figures also prominently in the *embourgeoisement* thesis according to which workers' adoption of bourgeois consumer behavior aligns them with the capitalist regime, expressed in conservative welfare attitudes, right-wing votes or higher voter turnout (Harvey 1976:272ff). This view hypothesizes that the interest burden of young households makes them unreceptive for higher taxes and that the suburban environment is tantamount to a retreat into private life. A number of studies across countries reveal indeed a distinct relationship between homeowning and showing conservative attitudes (Bayram/Gugushvili 2014) or voting behavior (Dunleavy 1979; Capdevielle/Dupoirier 1981; Häußermann/Küchler 1993). More specifically, the rise of homeownership has been used to explain the decline of unionism and the French communist party (Groux/Lévy 1993:194ff), anti-public-housing positions of American unions after WWII (Botein 2007), the decline of the American socialist party (1900-1916) through suburbanization (Edel/Sclar/Luria 1984:308), higher voter turnouts in US elections and political involvement in Germany and the US (Glaeser/DiPasquale 1998; Blum/Kingston 1984; Alford/Scoble 1968) and even the rise of the new anti-tax Republicans growing out of property tax and anti-busing protests in suburban California (McGirr 2001; Martin 2008; Lassiter 2006). These findings, however, have also been controversial as they usually cannot exclude a selection-effect of homeownership in favor of conservative households (Saunders 1990) and do not show what establishes the causal link between homeowning and specific attitudes.

A related claim – put forward by homeownership promoters ever since the 19th-century – supposes that homeownership makes societies more equal as it makes the lower classes participate in a country's wealth and frees everyone from dependence on landlords. Across the 20th-century there is indeed evidence that thanks to more widespread homeownership overall wealth has been distributed more equally, even in countries of strong income inequalities (Feinstein 1996:104). Housing wealth is generally distributed more equally than wealth in other assets (Blossfeld/Skopek/Kolb 2012:181; Kessler/Wolff 1991:263) although there seems to be a persistent homeownership access problem for certain groups such as Afro-Americans in the US (Massey/Denton 1993; Collins/Margo 2011). Homeownership *rates* alone, however, are no guarantee for more widespread wealth as property values of owned homes are usually lower in high-homeownership countries (Kolb/Skopek/Blossfeld 2013). Recently, the claims about homeownership's equalizing effects have been identified as part of a so-called asset-based welfare regime, supposedly substituting traditional non-private equity based welfare regimes. Evidence about wealth inequality, let alone its dependence on homeownership, is scarce, but three types of still controversial findings shall be mentioned: first, historians of the 19th-century (Thernstrom 1964:155ff) and 1970s' Marxists (Edel/Sclar/Luria 1984:137ff) have suggested for the US that higher homeownership came at the cost of social mobility as overburdened

homeowning parents lacked the necessary resources to invest in their children's future; what is more, inequality of seemingly equal homeownership re-emerges in form of unequal property values and unequally risky property value developments. Secondly, there seems to be a positive cross-sectional association of high-homeownership countries and the Gini-coefficient of income inequality as well as a co-movement of homeownership and income inequality increases in the late 20th-century that several authors take as an indication for homeownership becoming a private welfare reaction against labor market deficiencies (Stamsø 2010; Norris/Winston 2011). Thirdly, there is at least an association between nations with higher homeownership and spatial inequality in form of urban segregation (Arbaci 2007), the rationale being that homeowners seclude themselves in separate districts leaving poorer tenant behind in homogenizing neighborhoods. Though different definitions of tracts should make one cautious in comparing segregation indices, the Duncan/Duncan dissimilarity index for white/black segregation in the US often approaches more than 0,6, whereas both ethnic and income-based indices for Germany are rather at the level of 0,2 or 0,3 (Friedrichs 2008; Cutler/Glaeser/Vigdor 1997; Hallett/Williams 1988:17; Häußermann:140ff), with the index ranging from 0 to 1, 1 being the highest segregation level.

The negative effect of homeownership on unemployment has been put forward as Oswald's hypothesis (Oswald 1996) and numerous studies for different countries and levels of analysis have both rejected and confirmed the hypothesis mostly for the late 20th-century (cf. van Ewijk/van Leuvensteijn 2009).[2] According to the hypothesis, homeownership is said to root people too strongly in their home region – as they fear transaction costs and possibly lower property values when selling – to the extent that they do not migrate to job-offering regions when becoming unemployed. The job-matching process in labor markets is thus inhibited. The hypothesis is still object of ongoing controversy as it is confirmed in macro-level studies but tends to be rejected in some regional and almost all individual-level studies.

Finally, a host of studies puts an emphasis on the beneficial individual effects on homeownership which are shown to include higher life satisfaction, better maintenance of one's property and therefore more neighborhood stability, higher performance of homeowners' children in school, less divorce probability etc. (cf. Megbolugbe/Linneman 1993; Dietz/Hauin 2003). With housing being at the crossroads of family life, individual consumption, labor-market participation and wealth formation, it is hardly surprising that homeownership is entangled with a multitude of causal effects. Overall, studies give the impression that homeownership implies many individual virtues but comes at the cost of at least some vices on

[2] See (Lerbs 2012:71) for a summary list of studies.

a macro-level. But neither an evaluation nor even a study of homeownership effects will be of much concern in this study which only seeks to explain differences in homeownership. But before coming to the causal side of homeownership differentials in existing explanations, I will introduce the overall trends in the dependent homeownership variable.

Development of homeownership rates

All occidental countries share some common trends in homeownership development which can be roughly described by a U-shaped curve ranging from the 18th-century until our days. With the bourgeois revolution, rural ownership tended to rise thanks to land distribution, the end of feudalism or simply due to eviction of non-owners to cities. At the same time urban HRs tended to fall as traditional craftsmen's ownership gave way to cities of small capitalist landlord and tenants (Harloe 1985:2). With urbanization and industrialization's low-income groups rising, more small peasant-owners transformed into urban tenants with the U-form reaching its vertex in the period between 1900 and 1950. Ever since homeownership has been on the rise in all countries, only temporarily interrupted by the 1930s, 1980s and 2008's recessions. While in the emptying rural regions usually more than 70% of the housing units are owner-occupied, it is the dominant urban regions that create the cross-country differences (UN 2001). The core of the homeownership-gap puzzle has therefore to do with different kinds of urban settlement structures making city-based explanations plausible.

This is not to deny that the initial differences of *country-level* international HRs were also due to the different forms of land tenure in agriculture, with more feudal regimes showing more tenants and the early democratic regimes showing more peasant owners, even if only of small parcels of land. Also, different European regions are known for different rural settlement patterns: politically more liberal nations rather contain more dispersed settlements and smaller villages (Dovring 1960). These averages most certainly conceal regional differences that reflect geographical variation and different feudal histories whose complexity goes beyond this thesis. Fortunately, this exclusion does not come at too much explanatory loss as the importance of the rural population and therefore its weight in explaining land tenure differences in HRs declined. Moreover, scarce overall data about rural ownership in the 19th-century suggests relatively similar values for countries like Germany, France or the US, oscillating around 65-70% (Holmes 1895:40). Today's rural HRs are higher than urban ones in almost every country, strongly suggesting that what happens in cities and on urban fringes is much more relevant when accounting for the homeownership gap.

Some preliminary remarks about the statistical definitions of homeownership are necessary because one finds a prima facie confusing bouquet of different numbers published and because

the homeownership gap shall be shown to be no statistical artifact. Reliable statistical *historical* and *comparative* data about HRs are scarce and are only available for the trend after the U's vertex. Comparability is complicated by definitions of who counts as a homeowner of what kind of unit relative to what kind of total of units. The homeowning household alone can be related to all households *or* to the number of individuals living in owner-occupied households can be related to the entire population (Braun 2004). The latter definition leads to higher HRs than the former due to the statistical prevalence of families among the owner households. A yet higher HR is reached once one regards all residential real estate owned, not only owner-occupied real estate.[3] Finally, one could count all residential real estate privately owned as opposed to the one owned by the state (or corporations) (Jenkis 2010). All of these definitions usually yield higher rates than the definition most often employed, namely to relate owner-occupied housing *units* to the entire housing stock. This is due to the fact that the number of units counted as entire housing stock exceeds the number of households.

This definition relies heavily on two further definitions, i.e. what is a housing unit and what is to count as the entire housing stock? Most common international comparisons are based on UN (UN 1974; Doling 1997:35:154) or EU collected data that merely repeat the respective national statistical definitions which differ quite considerably (Behring/Helbrecht/Goldrian 2002). The more liberal a definition of housing unit, the higher the HR; the more liberal the housing stock definition used, the lower the HR. Most development countries' high HRs can be explained by their lax definition of what counts as housing unit and property right (Angel 2000:94ff). Though OECD countries adopt quite similar definition of housing unit [4] (cf. Donnison/Ungerson 1982:42) the US' inclusion of trailers, seasonal and mobile homes is an exception (US-Census 2013), constituting around 7% of the housing stock with significantly above-average HR. These units, were they statistically significant, would probably not count as housing units in Germany. This finding, however, is not a mere statistical artifact but betrays a resultant of a different way the homebuilding industry works in the respective countries. I will show how stricter municipal building norms and an artisanal mode of single-house production impeded the rise of a similar phenomenon in Germany.

In turn, the explanatorily less relevant definition of the HR's denominator, the housing stock, might differ as to whether one includes recreational housing units such as tourist cabins,

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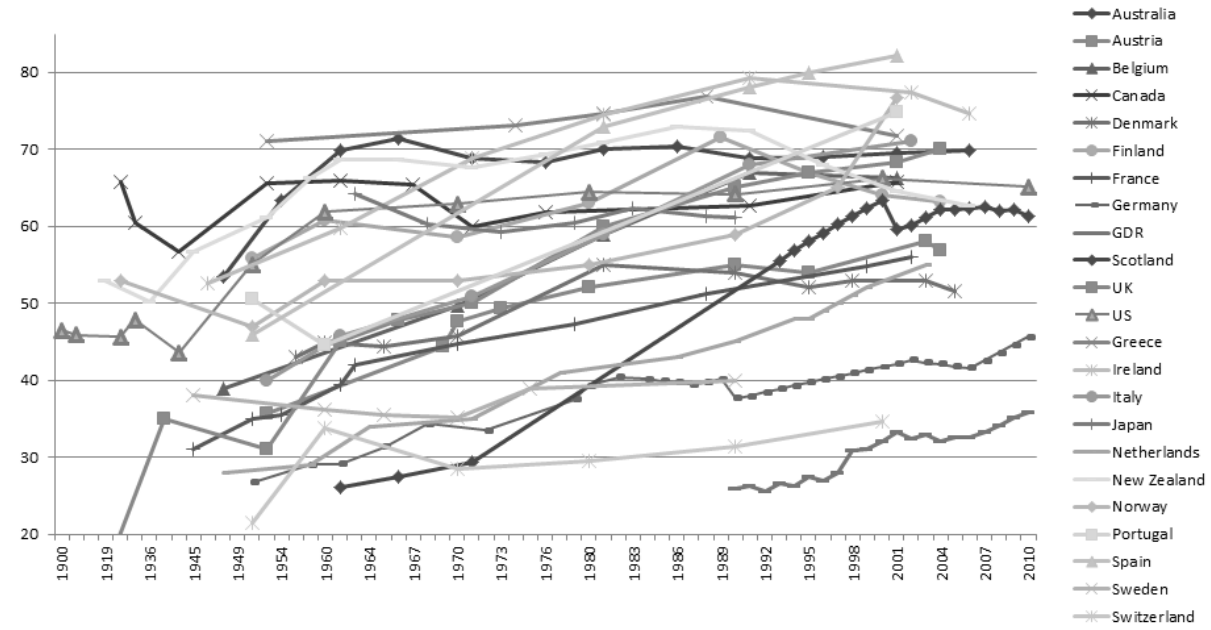
[3] The low German homeownership rate is not eliminated if one drops "owner occupied" from the definition. The latest ECB wealth report reveals German households are among the fewest (17,8%) to own non-occupied real estate, confirmed by Luxembourg wealth study data (Sierminska/Smeeding/Allegrezza 2013). Countries with strong rent price restrictions and therefore rich sitting tenants, a vacation home culture and low banking investment alternatives score highest according to this ownership definition (up to over 50%) (ECB 2013:24).

[4] Therefore, Proxenos' suggestion to give up HRs as housing indicator for *global* comparisons need not necessarily apply for comparisons across old industrial economies (Proxenos 2002).

secondary residences, trailers, ships, seasonal housing units, vacant or temporarily unoccupied units. An intra-European comparison of what various national statistical institutes count in the housing stock of the HR reveals the German definition to be among the most conservative (Destatis 1989:7; SE/CZR 2004), i.e. were other countries to adopt the German definition, their HR would be even higher. This observation holds also for the US-German comparison: as the US Census definition of HR includes seasonal and other mobile units, it tends to be lower than it would be according to the German definition. These findings suggest, on the one hand, that statistical re-definitions of homeownership cannot explain away the homeownership gap – common definitions would even widen it. On the other hand, the HR-range of changing definitions can extend to several percentage points, a measurement error that should caution one to believe in studies relying on too small year-to-year variations. Moreover, annual housing stock data are calculated through the number of newly constructed and demolished annual units what new surveys reveal to have error margins of several percentage points. This data constellation suggests to look at longer time periods and cross-country differences that display larger variation and to engage in case-sensitive historic work to avoid the definitional pitfalls.

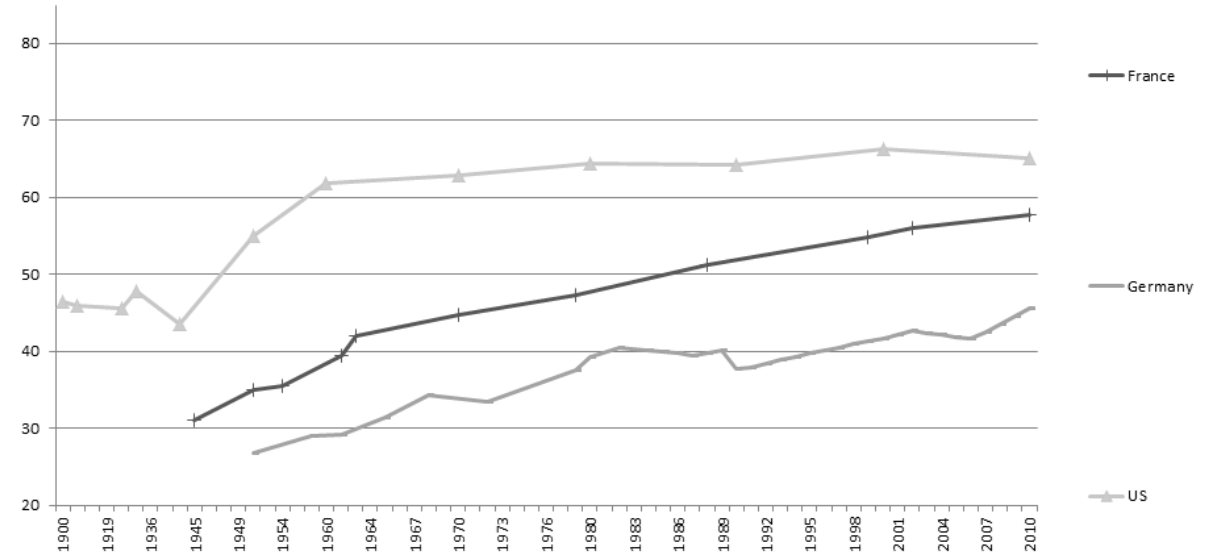
What is more, most countries did not include homeownership questions in their *national* census until after WWII, 1946 in France's *recensement*, 1950 in Germany's *Gebäude- und Wohnungszählung*. Only in the US did the 1890 census contain the first question about owner-*occupied* housing units and questions about general housing ownership even allow approximations of prior HRs (Collins/Margo 2011:2). After WWII, the United Nations collected these national housing data (enriched by further national sources) which constitutes the most common reference for international comparisons and results in the following graph:

Figure 1: International homeownership rates



Source: UN and national statistical offices[5]

Figure 2: HRs of case studies



Source: National Statistical offices

[5] An important note on the German HR of 1950: the official *unit-based* HR is given as 39,1% at a time when most air-raid destructions of predominantly urban tenement housing was still apparent, two million people still lived in barracks with many others doubling up, 35,6% of households subleasing and the secretary of housing estimating a housing deficit of 4,8 million units, mostly rental (Schulz 1994:32ff). If one considers therefore the household-based HR, one arrives at the more realistic HR of 26,7% in 1950 (Glatzer 1980:246).

The last two decades of the graph reveal a picture familiar to the comparative housing literature: southern European (and not-shown Eastern European) countries have the highest HRs with Anglo-Saxon countries following, some continental countries just below and German-speaking ones at the bottom. The longer-term perspective allows for two further observations: first, the overall rise in rates has not been distributed equally, especially German speaking countries display a rather modest growth rate; second, though the ranking of countries through time does not remain the same – England, Scotland and some southern European countries mix up old hierarchies – it nonetheless represents a certain stability, especially for the homeownership gap between the other Anglo-Saxon and the German-speaking countries. This relative persistency is only underlined by the scarce comparative data sources for city homeownership rates prior to WWI. Taking them into account produces the following scatterplot for German cities around 1907 and American cities in 1890.[6]

Figure 3: Urban homeownership and single-family house rates

Source: (Baron 1911; RWZ 1918; Tygiel 1979)[7]

[6] A unique, though internationally hardly representative, worker-household based survey from the Commissioner of labor reports 1889 reveals similar results with US workers HR at 17,7%, the French at 4,8% and Germany even lower (Haines/Goodman 1991). For the considerable difference in worker HRs across the examined countries see also the country chapters.

[7] German data refer to house-owners generally, not only owner-occupiers and are therefore even overestimated. Due to low construction in the war years I combine the German 1918 building structure with the 1907 ownership data.

The plot reveals both a systematic homeownership gap between US and German cities and a higher frequency of single-family dwellings in the US, to be exploited and further explained in the respective country chapters. What I intend to emphasize here is that the countries' HR differences are not of recent origin and explainable by latest demographic or economic developments of the last two decades and not even of the post-WWII housing policies. Differences reach back to what happened in the 19th-century and the data suggest that the urban level is an important difference-maker.

Explanations in the existing literature

It would be misleading to talk of an integrated body of scholarship concerning homeownership though there is a loose and growing field of comparative housing research that I address (Doling 1997; Kemeny/Lowe 2005). One observation is that "[t]he questions [of homeownership] engage theoretical and empirical work by urban economists, Marxists, urban geographers, sociologists, anthropologists, and historians. The scope and implications of the studies, as well as their sheer volume, intimidate. Often, home ownership is a small point embedded in more comprehensive theoretical constructs. [...] Therefore ideological and prescriptive outlooks spice most writing, and few discussions are neutral. [...] The links between cause and result are ever complex, sometimes unfathomable" (Doucet/Weaver 1991:165). Among the works directly dealing with homeownership, there are three types of studies that either try to explain homeownership per se, the rise of homeownership or homeownership differences across individuals, regions or countries.

The *first* kind of studies connect homeownership to grand social theories such as culturalism, modernization theory or Marxism from which the following attempts to explain homeownership phenomena can be derived (see: Duncan 1981):

Cultural explanations explain homeownership-phenomena with reference to beliefs and desires held by individuals in specific regions of homogenous culture. Sometimes one finds the claim that the kind of explanation by cultural preference – people own because they want to own – is tautological, i.e. empirically always true, and that therefore these kinds of explanations should be dismissed a priori. This claim is false, however, because it is easy to imagine situations under which ownership-desiring people do not own for some circumstances as they occur in Germany. The supposedly tautological statement "Whenever people desire to own, they own" can apparently be false. The real problem with cultural explanations more generally is rather that it often does not provide additional information in many question-answer contexts – when seeing Jones in his own house it seems to be the default assumption that he wants so, believing it to be a good thing. The more crucial problem with the literature-pervading explanations of

the kind[8] "The culture of home ownership is integral to the North American way of life" (Choko/Harris 1990:74) is (i) that they are empirically elusive or not founded, (ii) that they have problems to explain intertemporal and regional differences and (iii) that they are often ad hoc.

(i) To my knowledge, there is no international study about homeownership *preferences* though there is an abundance of respective national surveys undertaken from national statistical bureaus, popular magazines or private research institutes often working for agents of the homebuilding and finance industry.[9] The percentages found for those desiring homeownership differ of course as to how much survey-questions enquire about mere desires or realizable plans. It is nonetheless surprising that most surveys find over 70% of people desiring homeownership across countries. Some contradicting studies come from the 1950s' Germany where percentages were much lower and most people just desired bigger apartments to rent (but: EMNID 1955), a result that must be relativized by the very special circumstances of cities in ruins, families doubling up (14,6 million households with only 9,3 million normal housing units in 1950) and 1,9 million residents in temporary housing units (Destatis 1955). The upshot of the German surveys is that much more people indicate to be attracted to homeownership than those who actually realize it, strongly suggesting that some structural obstacles beyond individual preferences seem to be placed in the way in Germany.

(ii) The survey results are also never used to explain the great subnational differences that a consistent cultural explanation would also have to account to not only economic but also to subcultural factors. Only anecdotal evidence about regional characters is sometimes cited, but evidence, for instance about the Swabian cottage-lovers (*Häuslebauer*) having supposedly higher HRs, are even shown to be wrong (Behr 2002). This relative rigidity of the homeownership preference across time and space of reports about consumer preferences does therefore not make the cultural explanation of homeownership very attractive.

(iii) Finally, explanations of the cultural sort often appear as ad-hoc, as explanation of last-resort that helps out when all other explanatory candidates failed. A particularly telling example for this use of the explanation can be found in the explanation of the 1890 HR that the US

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[8] See, for instance, Saunders: "The popularity of the twentieth century tenurial revolution in Britain is testimony to the strength of 800 years of a cultural tradition which is distinctive from that of mainland Europe" (in Doling 1999:164), which could be seen to be rooted in a political philsophy termed "possessive individualism" (MacPherson [1964] 1967). Or also "The desire and willingness to move and the inclination to newness and change, often paraphrased by the word "adventure", are widespread character traits of Americans. […] Their restless quest for happyiness, advantage and innovation has played a crucially important role in designing the improvised American urban landscape and the nation's suburbanization" (Holzner 1996:45). Also Culler (2003:133f) is among those anchoring ownership of detached houses in the American-dream tradition.

[9] See for a list of these surveys in Germany (Biedenkopf/Miegel 1978:18ff), in France (Grison 1956:24f) and the United States (Megbolugbe/Linneman 1993:660).

census had revealed to be below 50%, which puzzled some observers who had apparently equated the frontier-homeowner with all Americans. One sought refuge in the following explanation:

"It is worthy of remembrance that we have been a migratory people, shifting from one occupation to another, and, as people in a new, rapidly developing country are likely to be, somewhat wanting in fixity of purpose and of aim in life. A restless, unsettled people is not to be tied to land. The ownership of a home hinders migration, and civilization has not yet proceeded far enough to do away with migration as a means of bettering one's condition" (Holmes 1895:43-44).

Contrary to the usual description of the frontier-American homeowner craving for his own piece of land, the author turns it upside-down in a way that will provide him with a suitable explanation no matter what next year's HR will be. Cultural factors are thus difficult to use in prediction-contexts and seem to fit to empirical data, no matter what these might be.

I do not want to deny that what people desire as housing form influences with what kind of housing they finally end up. In societies with autonomous political subjects and the ideas about free consumer choice this denial would hardly be realistic. Their secondary role, however, just does not account for the observed variance and might be reducible to causal antecedents that form homeownership preferences; the way one's parents lived (Boehm/Schlottmann 1999), the city one grew up in count foremost among them, with the building trades, marketing departments or governments' housing departments as important factors that change these sticky worldviews.

Economic functionalist explanations, in the guise of modernization (Zaretsky 1976), Marxist (Castells 1977; Harvey [2012] 2013:91)[10] or industrial capitalism theory (Donnison 1967; Schmidt 1989; Burns/Grebler 1977), often propose to the contrary that modern democracies, capitalist economies or industrial growth make rising homeownership a necessary accompaniment. The reason for this being necessary comes from the attribution of different functions to homeownership: it is said to produce for better democratic citizens and nuclear families, pacifies industrial workers and absorbs surplus capital or simply expresses a higher level of income and consumption. Whereas preference-based explanations tend to predict a remaining divergence of housing indicators, the functionalist explanations tend to agree at least on a convergence along the lines of economic development (cf. Kemeny/Lowe 2005). Using GDP development as the most common indicator and explanatory variable of these functionalist explanations, they stumble upon a paradox. Income variables explain higher household HRs and rising GDP can explain rising national HRs for some periods in time, but: "Of particular interest is the fact that the four countries in this 'deviant' group [with home-

[10] An off-spin theory of this urban Marxist school also allies with industrial-elite conspirational ideas to explain homeownership (Colenutts/Ambrose 1975).

ownership rates of a third or less and which collectively do not show any obvious trend over the postwar period] – Sweden, West Germany, the Netherlands and Switzerland – are among the richest and (with the exception of Switzerland) most highly urbanized countries in the world“ (Kemeny 1981:7). Economic-development or settlement-area variables thus do not seem to account for different HRs on the country level.[11]

Economic functionalist theories also back the widespread intuition concerning convergence in comparative housing studies ever since Donnison (cf. Doling 1997:82). Convergence theories both concerning housing policy and markets have much to it if one disregards minor differences in timing. In all occidental countries housing production cycles, determined by the World Wars, then the 1970s recession, followed broadly similar lines, housing quantity and equipment with amenities steadily increased through time (Donnison/Ungerson 1982:41ff). As to housing policy, the following historical trajectories were more or less common: merely negative regulation of private rental housing stock before WWI, government intervention focused on quantity, then on quality between WWI and the 1970s, stronger focus on individual affordability, housing allowances, homeownership subsidies and less direct construction subsidies ever since (cf. McGuire 1981:12; Harloe 1995; Power 1993). Given this overall evidence in favor of convergence both of housing policy and market indicators, the quite stable homeownership gap between some country groups appears especially puzzling.

A final functionally sounding theory with some history in housing studies (Kemeny 1980; Castles 1998; Castles/Ferrera 1996; Kemeny 2005; Doling/Horsewod 2011) that has gained certain momentum in explanations of the latest American credit crunch (Rajan 2010:9f, 42f) is based on the idea that there are private and public ways of guaranteeing citizens' welfare and that – to the extent that private welfare including (debt-acquired) homeownership exists – public welfare states are or become redundant (Crouch 2009). The more countries build up a public welfare state, especially public pensions, the less homeownership becomes necessary; the more welfare state retrenchment sets in, the more countries adopt homeownership policies. Homes, in that scenario, serve as savings bank and mortgage collateral for private pensions, education and health care expenditure; rising house prices should provide a wage-income alternative income source as "asset-based welfare" (Ansell 2012:532f; Doling/Ronald 2010). Indeed a correlation of countries' welfare state expenditures and homeownership (Schmidt 1989:94) or private debt rates (Conley/Gifford 2006:71; Prasad 2012:229f) can be found for the post-1970 period. Indeed, a correlation between welfare-state types and HRs in countries yields a rough arrangement of corporatist countries with low HRs, much public and fewer private

[11] See already (Weber 1899:147) for the finding that settlement area does not determine urban structures.

rental housing, of liberal countries with high mortgage-financed homeownership, few private and almost no public rental housing, of rudimentary southern welfare states and high family-financed homeownership, almost no private and public rental housing. Finally, of social democratic countries with low HRs, few private and much public or cooperative housing.

Barlow and Duncan go even further when associating the kind of construction land provision system with the respective welfare regimes – private land and speculative building provision in liberal regimes, private land and self-help housing provision in rudimentary regimes, semi-public land provision and a combination of self- and restricted-profit-promotion as housing provision in corporative regimes and public land provision with a dominance of restricted-profit promotion in social-democratic regimes (Barlow/Duncan 1994:33ff).

The attractive welfare-mortgaged homes trade-off theory seems to hold only for intertemporal and cross-country differences within a specific time period beginning in the 1980s (Streeck 2013:15). The conservative parties in most countries tended to cut back housing and other subsidies (Pierson 1989) while enabling an international financial market to provide easier access to mortgage credit (Schwartz 2009).[12] Once more mortgage credit inflates housing demand, house prices tend to inflate leading to more necessary mortgage credit; this house-price-mortgage spiral can be observed in various homeowner nations. Outside of this particular period, however, the theory scores less well. First, mortgage credit and urban HRs have been on the rise in the US ever since the first survey in 1890 and this independently of the varying social expenditure in the period until the 1970s. Secondly, in almost all countries, HRs grew to the largest extent in precisely the time-period of the expanding comprehensive welfare states between 1930 and 1970. General growth of income in conjunction with social democratic regime preference for a non-homeownership alternative seems to act as a common cause of the supposed trade-off in these periods. Finally, there is too much intra-group heterogeneity to make the housing-welfare connection work without further explanations. One of the deviant cases for this theory is France which is commonly considered a corporatist welfare state like Germany and which has yet a HR persistently 10 to 15 percentage points above the German one. In this thesis, I will argue that the welfare/homeownership trade-off did indeed also play a role in setting countries on different housing paths, though already *long before* the 1980s. Common welfare conceptions and the use of public social security funds for housing were the driving mechanisms. The explanation of the deviant French case in the final part of this thesis

[12] The fact that Reagan's and Thatcher' governments also wanted to cut homeowner subsidies fits less well into the picture (Pierson 1989). Generally, there is still a lack of empirical precision of mechanisms through which the trade-off is supposed to operate, but see (Mertens 2014).

is meant to show, however, that this is not the only explanatory factor. Factors concerning urban form, housing finance and construction can better account for intra-welfare-type variance. The *second* group of studies looks more inductively at possible quantitative factors that could explain individual, interregional or international homeownership variations. The individual level findings, mostly with post-1980 datasets, usually confirm across countries the positive influence of income, age, children, higher occupational status on owning (vs. renting). Existing studies of interregional and international differences have pointed to lower urbanization, warmer climate, ethnical diversity, population in property-buying age, credit availability, lower house prices and suburb location, high inflation (expectation), low welfare expenditure and low construction and land prices as being among the causal factors determining higher HRs. Among those studies are:

Table 1: Studies explaining HR variation at different levels

Study	Area	Main Data	Significant regressors
(Lerbs/Oberst 2012)	GER	Mikrozensus 2006	Price-to-rent ratio, Price-to-income ratio, Percentage of 15-25, 50-65 year old, Immigrants, Household size, Urbanization, Unemployment rate, East-German dummy, Recent house price change
(Andrews/Sánchez 2011)	EU	OECD 2000s	Household size, higher LTVs and debt-tax relief, low downpayments, household age, education, income, absence of rent control
(Lauridsen/Nannerup/Skak 2009)	DEN	Municipalities 1999-2004	House prices (also neighboring municipalities), income, population density, urbanization, age composition, civil status composition, financial ability
(Gwin/Ong 2004)	UN	UN-Habitat 1993-98	GDP per capita, household consumption, credit provided to the private sector, stocks traded as a percent of GDP, age dependency ratio, illiteracy, percent of population over 65, and the rule of law
(Fisher/Jaffe 2003)	UN	106 UN countries 1980-1999	Population composition, German legal origin, tropical climate, ethnical diversity, GDP (-)
(Behring/Helbrecht/Goldrian 2002)	GER	Länder 1990s	Urbanization, land prices, housing subsidies, West-German dummy, working spouses (-), income, Catholics, foreigners (-)
(Coulson 2002)	US	Current Population Survey 1998	House price/rent ratio, vacancy rates, suburb location, density, immigrant ratio
(Angel 2000)	UN	UN Habitat 1990s	Mortgage credit, low construction costs, government subsidies, relative costs compared to renting, lower social expenditure, long-term inflation
(Struyk 1976)	US	Census 1970 SMAs	Mean income, percentage of units in single-unit structures

			and built before 1940, size of market, percentage of white households, household composition, age structure
(Schmidt 1989)	OECD	OECD countries 1970-1984	Total (social) expenditure, proportion of socialist MPs
(Eilbott/Binkowski 1985)	US	Census SMAs 1970s	Age and household structure, household income, house values

It lies in the nature of these quantitative studies to leave a series of further research puzzles which I will gratefully take up in my in-depth case studies. Fisher and Jaffe, for instance find, that "[i]ndeed, countries with a German legal origin have significantly lower HRs than other countries, even when holding rates of urbanization, government consumption and other demographics constant" (Fisher/Jaffe 2003). What precisely are the language or legal commonalities the authors find significant for their dummy variable? Due to the nature of quantitative data availability, the studies usually find demographic, geographic and economic variables among the main drivers of HR differences, often without including possible institutional differences that could give further insights about the "legal origin" thesis. Most of the subnational studies reveal the importance of house price and cost data for the extent of homeownership while international standardized house price data of some temporal extension do not exist. Many spot-comparisons however highlight the higher house-to-income ratio in German-speaking countries (unto 6-8:1) in comparison to Anglo-Saxon ones (app. 3:1) (Stahl/Struyk 1985; Ball/Harloe/Martens 1988:118; Mehnert 1982:5), begging the question: Why do house prices have so much variance in economies with similar industrial fabric?

Another demographic approach comes from life-cycle analyses which explain the different homeownership rates with reference to age groups (Wagner/Mulder 2000) (Chevan 1989). These studies reveal a relatively consistent inverse U-curve for owner-occupancy rates across individuals' life course, rising in their 20s and 30s to a maximum in the 60s and slowly falling thereafter. These analyses capture quite well the homeownership increases coming from ageing societies and also describe earlier entries into homeownership in the US compared with German averages, though without explaining it (Braun 2004:5). Thus in the 1990s, the average German bought the first home at 38 years as compared to 32 years in the American case (Aring 1999:6). My explanation will suggest that this difference is due to saving-behavior particularities generated by the German form of housing savings banks.

A remarkable feature of all of these socio-economic, demographic studies is their omission of political power variables in countries (pace Schmidt 1989). If one considers the studies about welfare attitude and voting behavior consequences of homeownership and the political divide

that a public versus private welfare could imply, it seems quite probable that a political economy perspective on homeownership makes a difference. And indeed: as re-enforcing mechanism of my path-dependence argument I find a difference of the political left that traditionally defended homeownership in the United States but social housing and tenants in Germany.

The major shortcoming of these studies is their dependence on existing data which limits them, on the one hand, to the post-1980 time period, when changes in HRs in Germany and the US were only marginal compared to the prior decades. The above urban homeownership data suggest that level-differences between Germany and the US largely preceded the time of OECD-data collection efforts. They fail, therefore, to give plausible answers to both the long-term changes and the long-term persistence of differences. On the other hand, the international studies in particular have strong omitted variables biases as crucial real estate market time series about housing prices or rent levels have not been available.

A *final third* type of study is case-oriented, either single-case or comparative, with more historic and institutional explanatory factors. In many writings, authors mention possible causes only in passing without providing further evidence for them. Among those factors one finds: settlement structure, transportation provision, access and costs to mortgages, inflation rates and history, etc. Köster and Mezler (1979), though citing far reaching factors such as the industrialization, the historic building structure, and the wars' wealth destruction in Germany without giving further evidence, finally settle on more economic causes for Germany's low HR such as the high house prices due to little standardization, restrictive mortgage lending and less homeownership subsidies. Both Kemeny (2005) and Voigtländer (2009) convincingly argue that the co-existence of a well-functioning rental market offers an attractive alternative to homeownership (also Kurz 2004:51). Whereas Kemeny mainly has in mind the non-profit housing sector that can pass on cost-rents to tenants especially when capital costs are amortized, Voigtländer puts the emphasis on the price-control effect of competition in the *private* rental market, supported by several subsidies in Germany.

For the American case, a standard narrative focuses on the extension of the mortgage lending practices, especially after WWII (Cohen 2003; Logemann 2013): American soldiers, pushed by their desire to settle into private home after the hardships of WWII, buy American cars, new mass products in shopping malls and suburban houses, financed by generously government-subsidized mortgages, moving the American HR by 20 percentage points. Different styles of consumption and the American welfare regime based on democratizing mass consumption (Prasad 2012) are also commonly cited to explain the higher homeownership rates.

Though I often align with these stock explanations of post-WWII developments, the thesis differs from them by showing that an important part of the homeownership-gap story had already occurred prior to these developments.

New explanation and outline

This selective literature review yields the following overall picture: Some of the more theory-driven existing explanations – such as GDP, population density, cultural preferences – cannot account for the homeownership differences at all. Others – such as most demographic and economic variables – are good at explaining recent and short-term variations in HRs but fall short of explaining the gap of homeownership *levels* and the longer-term growth differentials. The stronger case-specific, institutionally denser explanations identify as factors: differences in government subsidies since 1945 leading to either cost- and private rentals or to more homeownership, conservative versus liberal mortgage markets for homeowners and a policy trade-off between public welfare and private homes. It should not be denied that all these latter explanations are valid partial answers to the question of HR growth differentials. They do not address, however, prior level-differences and the urban differences that I try to address. Nor do they explain where the differences in mortgage structure, rental and public policy come from. By pointing to some prior causes I additionally try to answer these questions and those left open from above: what is it about the German-speaking as compared to other countries that makes a difference and why are house-prices-to-income so much higher there?

The explanation I offer is therefore more historic arguing that pre-WWI developments already established long-lasting country-differences; it situates the origin of these differences in the urban context of housing production and it localizes the differences on the production side of the coin – not the cultural preference side – arguing that differences in the organization of the home-financing and construction industry were important difference-makers. By bringing in the urban level and the construction industry as explanatory factors, I also respond to desiderata expressed in comparative housing research (Kemeny 1992:123ff; Doling 1997:105) while the construction-industry explanation links the housing subfield for the first time to the wider political-economy question of different production and skill regimes.

More concretely I argue that 19th-century urbanization processes left a legacy of compact public cities of tenants in Germany and suburbanized private cities in the US; that the US tradition of savings and loan banks left a tradition of individualized home savings and a finance-sided housing policy, whereas Germans pooled savings for cooperative flat-constructions with a building-subsidy-sided housing policy; finally, Fordist mass construction entered the individual home industry only in the US, whereas artisan-like individual home

construction never made detached houses a cheap mass product in Germany. These dominant supply-side factors – city structure, finance, building and government – created hard-to-reverse physical and institutional structures beginning in the 19th-century urbanization that set countries on diverging housing paths. Functional and power mechanisms pushed countries along these paths, whereas mechanisms of conversion of rental into owner-occupied units and of layering through suburbanization acted as path-breakers.

On an explanatory level, the kinds of explanation I offer rely on insights of the historic institutionalist literature in that they respond to an empirical puzzle, in that they do not rely on fixed cultural preferences and contain a macro-historical view of institutions (cf. Thelen 1999). The overall argument relies on the idea of path dependencies, i.e. certain, often distant points in history constitute critical junctures for countries to be set on different trajectories from with certain reinforcing mechanisms impeding them being set off the track (Mahoney 2000). The other path-dependence contribution – historical sequences – will also be part of the overall explanations: not the mere presence of an institution in a country makes the difference, but also the historical moment when it emerged. I do not adhere strictly to path-dependence tenets as those explanations have sometimes been criticized for not considering possible path-breaking actors.[13] I therefore try to make plausible in each chapter why one path was taken in one country and remained undeveloped in the other country. But the basic idea that historically distant events can still have their causal say and that some developments are harder to reverse than others pervades much of the argument.

On a theoretical level, the study contributes to research in a yet little noticed type of market, i.e. markets for durable goods whose use stretches over time. Of the many cited peculiarities of housing as a commodity (Eekhoff [2002] 2006:3ff) – its capital-intensiveness and importance in household budgets, its heterogeneous quality, the quality-importance of its external environment, its immobility and its being a necessity – durability is possibly the most central one from which others can be derived and of the many economic commodities offered housing is probably among the most durable, behind public works or goods demanded for their historic value. Possible other candidates constituting markets of durables besides housing units are cars, all kinds of consumer durables and objects conserving value over longer periods of time, but also labor or stock markets or the market for firms can fall under this wider notion. Economists have already focused upon some particular problems going along with particularities of these markets that possibly affect the standard model of perfect markets, though empirical studies are

[13] Nor do I share the conviction of path-dependence promoters that path-dependence explanations are distinct from typical historical explanations. Critical literature on path-dependence is: (Ebbinghaus 2005; Fetzer 2009; Jackson/Deeg 2006; Streeck/Thelen 2005a; Crouch/Farrel 2005; Beyer 2006; Mahoney/Thelen 2010).

largely lagging behind the model-theoretic discussions (Waldman 2008). Thus, companies in durable good markets may decide about the degree of durability in addition to the usual price and quantity parameters and this decision might differ depending on competitive or monopolistic markets; they might develop strategies to eliminate secondary markets; and these secondary markets create the much discussed quality detection and information asymmetry problems.

An essential property of markets for durables is its division into a primary and a secondary market. The longer a durable's life, the larger the offer out of the existing stock becomes which, through competition, disciplines the newly entering offer. For a market sociology of these durables, to which this thesis contributes, this implies that its present object can only be explained with reference to the growth of its historic stock whose changes become noticeable only over longer periods of time.

The research design most apt to grasp the country-differences through time is the case-study design, sensitive to the individual historic trajectories and based on existing historic literature and selective urban datasets. Choosing most dissimilar cases of different country groups further allows to find the difference-makers to the outcomes and to extend the explanation eventually to other members of the groups. In the conclusion, I will make plausible that the German case offers insights for an entire country-group including Austria and Switzerland and that the American case merits to be seen as an example of a wider Anglo-Saxon group. Part III is thought as an application of the found explanations to the difficult country-case of France and it will describe the country's homeownership development as a hybrid of the two prior cases.

A first reason for the design is *ex negativo* the weakness of possible alternatives. The problems of broader internationally comparative datasets are their limitation to the recent past only and thus to a time period in which the homeownership gap already had a considerable history. Moreover, even these international datasets lack the most important real-estate and mortgage variables such as comparable price- and rent-levels or mortgage conditions for longer time-spans. Finally, the possible error-margins of the internationally comparative homeownership rates make analyses of small variations in country-year cases open to attack. A second positive reason for the historic case-study design stems from the persistence and durability of the phenomenon under study and from the fact that I locate the explanatory gap in the lacking historicity of the existing literature. A third reason speaking in favor of a study based on existing literature on urban, financial and construction history lies in the breadth of the topic which otherwise would be hardly feasible, while the literature's mainly descriptive focus permits to exploit it for explanatory purposes. Furthermore, the enormous and disparate urban history literature is largely unconnected to the more systematic questions of political economy

and housing research, the latter being narrowly focused on recent time frames only. A feasible alternative design would have consisted in choosing pairs of comparable cities within the different countries to increase within-case depth for the urban level. Ultimately, I partially accommodate this feature through short excursuses about particular cities to probe my general arguments. Otherwise, two further reasons speak in favor of the national, yet city-sensitive design: first, the homeownership-difference question is conventionally asked on the national level. For this literature, including sets of urban variables already opens up a new dimension, comparable to the discovery of regions in political economy (Herrigel 1996:20f). Secondly, the findings reported suggest that in spite of much regional variation *within* countries and some deviant cases, there are systematic differences *across* countries that concern the majority of cities. Housing-related variables led to a surprising country-specific clustering of cities allowing the generalizing term of the "German city."

This design evidently has limits because when drawing on largely existent works and sources for each country it leaves the meticulous historian unsatisfied, whereas its limitation to a few cases only does not live up to the generalizability expected in quantitative studies. By going into more detail in country-cases as is usually done in comparative housing research, while at the same time trying to generalize, I attempt to overcome this two-sided critique. While the overall comparison is national, housing is a local and variegated matter though often following overall trends. By including the urban level in the analysis – in the form of descriptions holding for a range of cities in a nation – I try to account for this variety while not losing sight of the systematic differences of cities across nations. This approach does not deny the influence of national policies on the dependent variable, but it makes a case for the much neglected lower-level influences on homeownership, as revealed in local change-resistant patterns. It thus follows doubts that have been raised as to the "methodological nationalism" inherent in many international comparisons (Le Galès 2002; Wimmer/Glick Schiller 2002).

The scope of the argument determines the use of data which relies heavily on the existing writings of, mostly, historians about the history of individual cities, general urbanization history and the history of housing politics. The thesis thus finds its limits in the richness of this material which is abundant in urban history, limited in housing finance history and sketchy in construction history. I enrich this material by selective self-composed data-sets about international, inter-regional and city housing variables and necessary independent variables, thus addressing a desideratum in urban research. Furthermore, I draw selectively on primary sources such as contemporary reformers' writings, key works informing housing policy, some parliamentary debates and public press coverage and systematically on party manifestos concerning housing positions.

The outline of the study is as follows: Two big country parts (I, II) present the German and the American case, each in a rough chronological way with one main chapter explaining the historical level, the subsequent one explaining its growth and development over time. The path-dependence argument outlines the overall structure of each part, starting with the critical juncture in the 19th-century followed by the re-enforcing mechanisms including the urban structure, the building and home finance industry. Existing literature would expect that a European corporatist welfare country such as *France* would behave much like Germany with respect to housing policies and homeownership while it actually does not – in the shorter Part III, therefore, I will apply my explanatory variables to explain the French case of a central European corporatist country with nonetheless higher HRs *and* social housing. The conclusion, besides finalizing the overall argument, intends to broaden the case to other Anglo-Saxon and German-speaking countries and makes some informed guesses about the possible convergence of HRs in the future. It further suggests how the explanations of the durable good housing and its specificities can inform more general market sociology of durable goods.

Part I. Germany, nation of renters

This part establishes an historical argument for how Germany became a nation of renters. The first chapter localizes a critical juncture in the Imperial urban structures that extended compact city cores into the surrounding area, thus creating dense physical structures of tenement[14] buildings for private rentals that became hard to come around. The second chapter names specific features that stabilized these structures and impeded a reversal towards more homeownership in the new construction units.

1. Critical juncture, the 19th-century: the creation of compact rental cities

At the beginning of the 20th-century, the British Board of Trade undertook extensive studies of the cost of living of the working class in Great Britain itself, Belgium, France, Germany and the United States. These industrializing nations were eating up Britain's industrial and commercial lead and different housing conditions were seen as one possible factor to explain the British competitive disadvantage. The inquiry was based on a sample of at least 30 cities in each country and collected levels of rent, wages, prices and general housing stock impressions. Unfortunately, ownership structures – only known to the American Census and some German cities at that time – were only reported in anecdotic manner. If, however, one considers the dominant association of multi-family units with renting in later central and northern Europe, then the reports' housing stock descriptions already foreshadow later homeownership developments and this at a time when the first housing acts were hardly passed in the examined countries.[15]

With hindsight, the study offers the most complete comparative picture of urban forms prior to WWI when the strongest urbanization had been largely accommodated by cities. It distinguishes between two broad types of cities according to their physical structure and layout. At one extreme one finds the British case that the Belgian case reflects on the continent, "[...] that is to say, the small house occupied by one or two families is the predominant type, whilst tenement houses play only a very small part, and even where they exist, are rarely of large size" (Board-of-Trade 1908a:viii). At the other extreme, the report finds that "[t]he German working classes are housed almost exclusively in large tenement buildings, frequently constructed round a central courtyard, each building containing a number of separate dwellings" (Board-of-Trade 1908b:xl). A similar picture is described for Scotland: "In an

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[14] With respect to the German case, I use the term "tenement" or "building of flats" interchangeably to refer to multi-unit buildings of rental units. The different use of the term in the American context (cf. Part II), where it pejoratively refers to working-class units only, as opposed to apartment-houses, is already revealing.

[15] The reports concern working class housing only, but given that the working classes tended to become half of all population and more and given that the housing problem and new construction was almost reducible to the question of how to house the working classes, generalizations should be permissible.

ordinary English industrial town, street after street of two-storey cottages built on an almost uniform plan are met with. In Scotland the cottage disappears and its place is taken by blocks of flats of two, three, and four storeys; in Edinburgh, for example, the most usual type of tenement house is that of four storeys, each with four flats or 16 in the block" (Board-of-Trade 1908c:xx). The report about France summarizes: "Thus, whilst in England and Wales the dominant type of working-class housing is a self-contained two-storied dwelling, containing four or five rooms and a scullery, and in Germany the prevalent type is a flat of two or three rooms in a large tenement house, in France both types exist, and though the German type is on the whole predominant, the tenement houses are not as a rule so large as in the neighboring continental state" (Board-of-Trade 1909:iv). While France is found to be right in the middle of the two extremes, the American case is found to be close to the British one with the exception of some tenement cities in the north-east, especially New York, and the strong tendency of workers purchasing their homes (Board-of-Trade 1911:xxvii). In Germany, the only city found to correspond to the British family-house and American ownership pattern is Bremen whence a HR of 40,3% is reported (p.107), a particularity persisting through the next 100 years.

The study of the Board of Trade should sensitize to long-lasting differences in urban form between countries that laid the ground for latter discrepancies in HRs. This chapter intends to show how the distinct German compact tenement city type, as later contrasted with the single-family-house suburbanized city type in the US, came about in the first place.

European cities are still built on the skeleton of Roman settlement, supplemented by the 11/12th-century settlement movements, feudal city constructions after 1648 and industrial cities in the 19th-century, to name but the greatest changes. Even in the 19th-century expansion phase one can observe relative stable city hierarchies with larger cities usually growing faster (Pfeil [1947] 1972:122ff). To pick out the late 19th-century developments of city extension as the critical juncture is not to say that prior city developments were irrelevant; the major population growth and the accompanying city extensions in Imperial Germany, however, acted as a catalyst without which these prior developments might have remained slumbering.

Some of these feudal inheritances[16] that the typical German home town of post-1648 was bringing along are indeed crucial to distinguish it from its American counterpart, one major feature being its closeness both in social and in physical structure, realized through its surrounding city walls, summed up in Max Weber's definition of "city":

[16] Or feudal *shackles* if by that one refers to limits of capitalist city growth and to freedom to settle as one wants (Hirschman [1982] 1986).

"One can attempt to define "city" in a variety of ways. But all definitions have one thing in common: it is at least a (relatively) closed settlement, a town (*Ortschaft*), not one or several isolated dwellings. On the contrary, today houses use to be located particularly densely, often one right next door to the other, in cities (but naturally not only there)"(Weber [1921/2] 1980:727).

The refortification of German towns began with the first reconstructions of old Roman town walls in the 11th-century as expression of a new urban consciousness against feudal lords or Norman invasions (Porsche 2000). Medieval walls then became a standard for towns until 1648 when ever improving artillery but especially territorial states and their armies began to make them militarily and politically obsolete. Until WWI at the latest, territorial states adopted the strategy to use heavily fortified frontier cities as bulwark against outer enemies while dismantling all inner fortification to abolish separate powers. Germany's late formation as a nation state, however, much retarded this general continental tendency which in France had begun in the early 17th-century (Wolfe 2009).

"The impact of the political arrangements of Westphalia on the physical form of German cities was unmistakable. Unlike the situation in other European countries such as France, England, or parts of eastern Europe, the idea of a wall-less, defenseless city remained for a long time a contradiction in terms in the German lands. In France, the king demolished many an urban wall in the seventeenth century, and in England, in the words of an Italian traveler, "the sea served as the wall and moat" of a united, even if not completely pacified country. But since every member of the Holy Roman Empire had the constitutional right to defend itself and since external threats did not disappear but had to be dealt with on a case-by-case basis, it was almost unthinkable for a city to demolish its defense systems" (Mintzker 2011:37).

Whereas the Napoleonic wars meant a huge wave of defortifications of German towns, many walls were still to persist throughout the 19th-century, for reasons of national security and against suburbanites, of city-pride or of tax collection (Mintzker 2012:212). This meant that much of the urban population growth accelerating from 1700 onwards (Bairoch 1988:215) had to be absorbed in the existing area by building up and compressing the urban structure to sometimes 90-100% built up area (Spiethoff 1934). Cities used their walls and remaining restrictions against liberal settlement practices to deny many a suburbanite city political rights of social and police protection and inner settlement. Prior to 1760, German cities seem to have managed the slow population growth and kept overall urban density below 240 inhabitants per hectare, with some poorer higher-density areas (Weber 1995). In the 19th-century, however, German inner cities counted among the most densely settled areas due to physical barriers that expressed the previous drive for military autonomy and continuing desire for tax and security politics autonomy.[17] Even where physical barriers were torn down in the 19th-century, city-father often still maintained "psychological walls" hampering uncontrolled urban sprawl

[17] See appendix 1) for a positive effect of the defortification date on the percentage of buildings with nine and more housing units in 1918, controlled for geographic position and population; the small sample of n = 23 should justify to report the effect in spite of its p-value of 0,14.

(Jerram 2007:394). Whereas this certainly accounts the inner-city multi-story housing stock, it does not explain why city-extensions did not adopt the American form of detached single-family suburban homes.

A first account of this difference goes back to the different situation of suburban land ownership in two countries. As a 1890 US census comparative study reveals US cities were endowed with much more acres per inhabitant, many of which remained unbuilt (US-Census 1895); the already built area shows the aforementioned high population densities per built area and per dwelling. The much earlier European settlement left all exurban land in the hand of agrarian owners, pre-existing adjacent municipalities or was feudally tied to corporations. Not until the 1850s did an unfettered market of land arise. The feudal agrarian use of land had often left it in the shape of small long stripes that speculative builders could best use by constructing deep tenement buildings (Lichtenberger 2002:165). Indeed, the subdivision of city blocks into longer parcels is a continental European particularity in contrast to the smaller parcels in rows carrying the northwest-European and American town houses, with New York City's large 8x30m (Montgomery 2003) and Bremen's smaller parcels being an exception (Häußermann/Voigt 1988:263). Smaller parcels in rows served by smaller roads also make low-rise buildings more accessible (Rappaport 1933:227). Among the (ex-)urban landowners the municipality itself had been prevailing, owning between several percent of the urban land up to possessing 50% of inner city land and several times the city area of outer land (Neefe 1900:16, own calculations). This vast municipal land was either used by cities for speculative purposes to cover municipal expenses or, with restricted expropriation rights, it became a tool to re-allocate land to socially desired uses such as low-cost housing cooperatives. Either way, higher prices or prescribed land use, did not particularly further the construction of single-family homes on these terrains. The fragmented outer-city land property structure, overcome in some towns through agrarian land consolidation laws, did often restrain early city extension.

Another feudal inheritance was the tradition of absolutist city planning concerning both its town-planning and architectural aspects. Attached multi-story stone construction, already existent as building type in form of *insulae* in Roman times (Liedtke 1999), had reemerged in the 12th-century with the urban renaissance though they became crucial as architectural ideal in the Italian Republics and in the French-born absolutist town-planning after 1648. In this tradition, feudal authorities developed certain building types that private builders when asking for the feudal building favor had to adopt, the overall goal being to create uniform and symmetrical patterns along the axes linking the monument-bearing squares, a tradition applied in the few feudal city renovations or extensions such as Berlin's Friedrichstadt or newly planned towns of feudal residence (Fehl 2012:61ff). Frederick the Great also replaced 300 low-

rise by four-story buildings between 1769 and 1786, granting the value-added to the otherwise ignored property owner, and was even surpassed by this enforced urban redevelopment by his successor (Hegemann 1930:176ff). Whereas these building types represented at most four-story-houses, the typical rental barracks had unto six stores (Hartog 1962:36), but both were built for wealthy families with at least four rooms that could eventually be subdivided to accommodate various low-income families and boarders (Fehl 1988a). But especially the more expensive front apartments were inhabited by wealthy bourgeois who showed renting to be a status-compatible form of living. "Certainly, once the middle classes become confirmed flat-dwellers in any town, there is very little chance of escaping from the 'flat-trap' thus created, even if external restrictions on growth [fortifications] are removed" (Sutcliffe 1974:9). Across the Alps, the early inner courtyard encircling rental buildings were often built on grounds of old *Meyerhöfe* and were demanded by the civil servants of the burgeoning administrative apparatus (Krönert 1979). Besides these better-off tenants, fortified, garrison- and particularly Prussian cities, above all Berlin, came along with soldiers and their families as a strong segment of demand, making up to one third of the population. Not only were they billeted as typical tenants in bourgeois quarters, but the first urban garrison constructions of the 18th-century are said to have produced a spill-over of rental-barrack-living into civil life (Hegemann 1930:167); renting soldiers and well-respected officers, enmeshed in civilian life, were a common sight in many towns (Sicken 1988).

Haussmann's Paris, probably among the latest feudal city constructions, made a small segment of apartment houses or "French flats" acceptable to the better-off even in the US (Cromley 1990:62). The rental buildings around an inner courtyard became an urban building type associated with continental Europe south of a line from roughly Le Havre to Lübeck, whereas smaller parceled town-houses, row houses, back-to-back houses everything north to it including the wider Anglo-Saxon countries (Lichtenberger 2002:198f). Even in poorer continental suburbs the tenements imitated ornamental façades of noble urban palaces while hiding inner miseries (Lenger 2012:99), while English noblemen largely lacking an urban residential tradition to imitate, much less so in Anglo-Saxon former colonies. Its conditions of existence, aside of absolutist influence via civil servant demand, the spill-over of bastion-engineering knowledge and architectural predilections – were a certain city size of more than 20.000 inhabitants and a producer, merchant and banking bourgeoisie willing to invest in these buildings (ibid. 212ff). This building type leading to a tenement-house system, not found in Northwest Europe, seems much of a hidden variable to explain city-types and eventually 20th-century housing tenure that already early town-planners found to be unexplainable climatic,

national or economic differences (Eberstadt [1909] 1920:5).[18] The dependence of this building type on the non-democratic eastern regions is supported by the inclusion of the significant longitudinal variable in a regression on the percentage of buildings of nine or more units in the urban housing stock (see appendix 1).

Thus, German cities already showed marked differences when compared to British or American ones before large-scale urbanization started. When compared to younger settlement cities, a considerable difference was, of course, that they had history at all, with established structures of urban governance and administration, making controlled forms of growth possible. The encumbering property rights meant a further impediment to rapid expansion. But even beyond these differences, the clear institutional and physical distinction between urban and non-urban areas, the barriers to growth, the higher-rise identical building types of absolutist planners and urban flat-tenancy as established form of residence are all features distinguishing the historic German city from American counterparts, where suburban land was less encumbered, low-rise buildings dominated and flat-tenancy therefore did not become part of a middle-class life-style.

1.1 Town planning by liberal municipalities

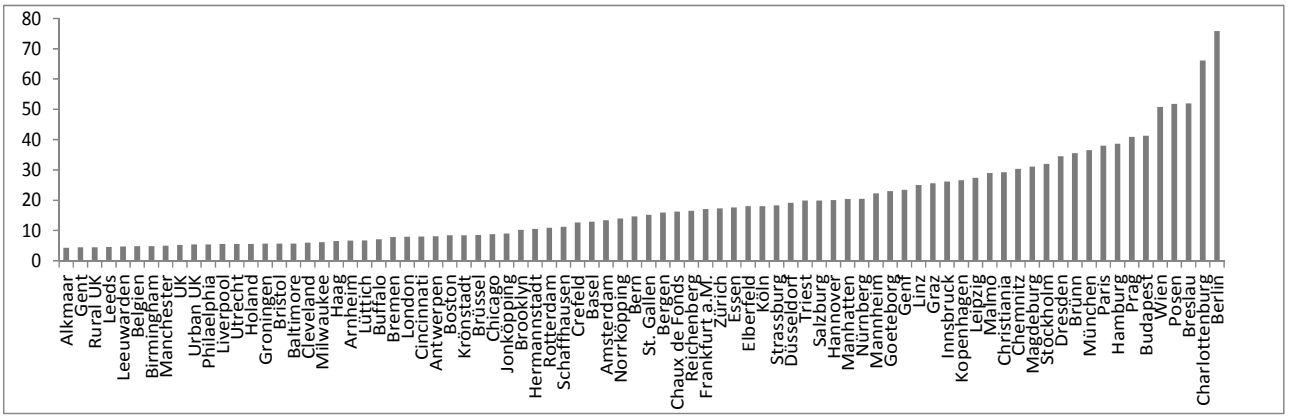
Feudal fortification shackles and a prior absolutist planning conception alone, however, do not account for the denser German city structure as cities underwent considerable growth both in area size through incorporations and most certainly in population terms. Whereas urban growth had already begun in the 18th-century as part of feudal population policies, the 1850s witnessed a first urbanization wave, with trade restrictions on suburban land lifted (Reulecke 1984:29ff). But it was between 1871 and 1910 that the number of big cities of more than 100.000 inhabitants grew from 8 to 48 with the share of the population living in these cities growing from 4,9 to 21,3% (Schott 1912:1). Almost the entire population growth was in favor of the *urban* population where in spite of the overall urban sprawl population densities still grew. In fact, the newly constructed areas showed higher numbers of people per building – this *Behausungsziffer* being a traditional indicator for higher-rise buildings – than the inner cities that had already shown considerable densities; whereas central cities in the Rhineland displayed 15 inhabitants per building on average, the outskirts could reach levels of 50 or even 100, in the

[18] Statistically, the difference of inner city population density and less sprawl is also confirmed by the few attempts to compare density gradients across cities. They depict the density of population as a function of its distance from the city center. These generally falling curves usually show higher starting points and steeper gradients for continental than for Anglo-Saxon cities (cf. Clark 1951).

extreme case of Berlin (Eberstadt [1909] 1920:7; Bodenschatz 1987:55). The population-per-hectare densities were highest in a 5-km radius around the city and fell within the wider 10 km agglomeration perimeter (Schott 1912:50). In a sample of the 55 biggest German cities, the average growth of population per hectare between 1871 and 1913 was almost 100% and this in spite of a considerable wave of suburban incorporations after 1885 which left some cities with much more vacant area (Hühner 1998). If one takes the extent of built-up area as a more fine-grained indicator, then this number grew slower than the population – by 11 hectare p.a. in 86 German cities between 1870-1908 (Böhm 1980:27) – suggesting that more people lived on fewer built-up area.

An international comparison of the average inhabitants per building around 1901 already shows clear differences in the urban make-up along the northwestern continental line already mentioned. English-speaking countries and cities – but for New York –, Belgium, the Netherlands and some Scandinavian countries – but for their capitals – house considerably less people per building than central European ones. The numbers could be distorted by more overcrowding per dwelling in tenements, but 19th-century overcrowding is equally reported from the small British or Belgian cottages. Thus, the average threshold of roughly 10 inhabitants per building can be said to demarcate the low-rise from the high-rise building countries, with Berlin surpassing this threshold already by 1700 being an extreme case (Hegemann 1930:94).

Figure 4: People per building in various cities and countries



Source: (Eberstadt [1909] 1920:6, 574)

The explanation for these differences put forward in this thesis is based on the different conception and role of municipalities in each country. At times when nation states and their administrations were still young, exhausted of prior infrastructure investments and under a liberal non-intervention paradigm, local administrations, especially in federations, played a much more important role than in the period of the stronger central state in the 20th-century.

Sam B. Warner famously described the 19th-century American city as "private city" by which he meant that cities were instruments subservient to private business interests and the particularistic political machines mobilizing segregated city districts where equal chances to access land or business existed (Warner [1968] 1987:156, 202). Simplifying, I refer to the German city type as the "public city" where an aristocratic, entrepreneur-like and real-estate owning elite, supported by a professionalizing technical administration, developed general city-planning and forms of overall welfare, sometimes referred to as municipal socialism. To be sure, almost all housing production was for private landlords, by private companies and financed by an emerging financial industry in favor of big tenement constructions (see section 1.2). But the public city intervened by controlling new and existing buildings, land use and street-lay out and managed the local network industries. It thus required minimum standards and taxes that increased initial building costs, impeded the uncontrolled suburban growth of low-quality small-parceled but owner-occupied slums and kept city growth in the range of public utility network capacities. These features of the public city, to whose development I now turn, made owning of small urban houses difficult and favored tenement constructions, even beyond purely economic reasons.

The institutional carrier of late-nineteenth century city-planning were local municipal governments whose tradition of self-government goes back to medieval and modern home town corporations as well as the *freie Reichsstädte*. After living in the shadow of absolutist centralist regimes, these cities regained new degrees of freedom from above through the Stein-Hardenberg Prussian reforms in the early 19th-century when, after the defeat against Napoleon, national citizens were to be fortified by granting them more local autonomy. To the extent that central governments did not yet occupy all-encompassing welfare functions (Hühner 1998:40), cities themselves, bearing the heaviest weight of industrial migration and recessions, stepped in and gained more and more competencies. All but southwestern German states, which relied on a tradition of autonomous city governments of their own, followed the Prussian city ordinance example. To be sure, Prussian officials maintained the last word, for instance, in approving the elected mayor but they usually pressured cities to go even further in most policy domains including the support of non-profit housing (Berger-Thimme 1976:151). The strong tradition of local autonomy in the otherwise authoritarian state led to a number of special characteristics setting German cities apart compared to their American counterparts.

First of all, German cities developed a comprehensive and enforced city-planning system controlling the building stock, new constructions and appropriate land use. The planning perspective went beyond the singular house and considered how it was to fit into the neighborhood or entire city. The mechanism through which this was undertaken was the city-

plan, often designed *before* a city-extension was to take place, and the municipal building codes that regulated the form of new and existing construction. No new or modifying construction was allowed to take place without the issuing of a prior building permit by municipal authorities that decided upon the existing building code and urban plans. 19th-century liberalism was also expressed in the freedom to build independently from feudal prescriptions and until the 1880s only fire-, solidity- and traffic-related together with norms regard height, surface coverage and density hindered an absolute building freedom. As administrative response to speculative building hygiene norms and building-height graded zoning followed. Though the building codes in relation with town-plans were a purely reactive instrument to private building, its forceful application in Germany – as compared to lax application in France and almost inexistence in younger American cities (Fisch 1989a:245) – they gave new construction in German cities their imprint with its intended and non-intended effects. Several features channeling new construction to tenement building types deserve a mention: building norms applied coarsely to all kinds of new constructions, making, for instance, the construction of small-unit tenements or smaller houses disproportionately expensive (Wischermann 1997:412); prior to the 1890s the inner-city building code for which only the big tenement house was the height and density limit was applied uniformly to the surrounding area as well, strongly inciting a maximum use of the new area, famously in the 1887 Berlin building ordinance (Bernhardt 1998:182); many codes also prescribed a conformity of new buildings with the inner-city building types which, after years of densification, had already grown to several-story buildings (Böhm 1983:222); the Prussian model code of 1919 thus prohibited any construction disturbing the uniform perspective of a street with respect to building type, form, material and color (Buff 1971:64f); the strict compliance with building codes also made the so-called wild settlements only a post-war exception in Germany. The non-regulated settlement of migrants on non-supplied lots not of their own but usually recognized by authorities ex-post has been a common type of "silent suburbanization" (Kuhn 2001:171) especially in southern Europe, France and the global south today and the Part II will show this mode of city growth to have constituted many historical suburbs in the US prior to the rise of professional developers and builders to mass-market provision. It goes along with a de facto spread of land and homeownership, an option that German municipalities, fearing the pending infrastructural costs of incorporating these poorly supplied settlements, knew to prevent in most times. Only in times of local financial overstrain after wars and in the depressions did exceptions to this rule arise (Harlander/Hater/Meiers 1988), but even then unconciliatory local building departments could deny permission ex-post and order the destruction provisional units (Wilhelm 2006:91; Lüning 2005:52f). The importance of this department is also reflected in the increasing number of civil

servants in German administrations, growing for instance from 3 in 1889 to 92 in 1910 in Essen (Von Saldern 1988:75).

Among contemporary town-planners, most strongly in Rudolph Eberstadt's work, the most common explanation for the tenement-system was a land-use-speculation-cum-street-layout determinism. The absolutist grand-city conception of cities was thought to have been conserved in the 1875 Prussian *Fluchtliniengesetz*, imitated by other German states, that was to remain the backbone of city-planning in force until 1960. It prescribed the use of town-plans and assured that no new construction was undertaken without prior construction of water- and sewer systems and streets, compulsorily financed by abutters depending on their frontage (cf. Spiethoff 1934:25). Eberstadt criticizes that the layout of wide streets and large lots led to deep land parcels where speculative builders could bear the abutters' fee and maximize their profits only by constructing the rental barracks that included building parts deep into the parcels ([1909] 1920:229f). The mechanism through which lower-rise housing became excluded from German city-extensions consisted in the too high land prices to be paid and the unwillingness of mortgage banks to finance it. Eberstadt's view was not uncontroversial – his land-price determinism disregarding building and other costs was criticized as well as his idea that artificial speculation with land increased rent prices (in opposition to the view that the expectation of high rents driving up land prices) (Teuteberg 1987:50f). Indeed econometric models of rent developments in German cities suggest that land price variation played only a minor role next to family formations, vacancy rates and income development (Wellenreuther 1989:10). But these controversies do not touch the town-planning role as contributory cause for higher land-prices and higher-rise construction in German cities. The simultaneous need of infrastructure and housing capital made larger tenement houses the economic choice and municipal requirements impeded a spread of infrastructure costs over more time that would have made lower-rise buildings possible and was one mode of urban expansion found in both the American and French case (Hartog 1962).

Another feature of city-planning was the municipal governance of land that was not as accessible to individuals as it was in the United States. The provision of building land as controlled by local building plans was partly in the hands of municipalities themselves, partly and for cost reasons it was delegated to big land companies and partly, but in rare cases, many separate owners themselves agreed to enter consolidation societies. Compulsory consolidation only became a policy instrument after 1902 in a growing number of cities (Ladd 1986:211). Municipalities, depending on the 62 largest cities in 1912, held an average of about 22% of all land excluding streets, railways, water areas etc. and ranged from less than 10% and to 77,4% (Neefe 1912). The cost in providing new building land made it a generally scarce resource

(Brenner/Geisert 2004) though the nature of the speculative land companies operating in the largest cities led to some periods of overproduction. Cities themselves used their land transactions to fill municipal coffers as in the case of Cologne's sale of former fortification land (Heisler 1994:207f). With this respect, they did rather little to determine the building types through price-reductions in their land sales with the residualist exception of granting cheap land to non-profit housing associations which usually built lower-income rental stock. Beginning in the 1890s, the lack of control over more than just city- and street-layout and the ensuing consequences of massive tenement constructions, led to further land policy instruments. District-differentiated building codes were introduced to allow for tenement constructions in some areas, smaller buildings in others and determine primary uses of certain districts (commercial, industrial, mixed); the codes, however, often followed "natural" land price developments and therefore only confirmed ex-post the dominant tenement structure (Rodriguez-Lores 1988:169, 176). By 1913 there were also 13 of 128 larger Prussian cities that had reanimated the emphyteuses institution that allowed municipalities to keep ownership of land while leasing it for a century; by 1910, 652 municipalities had introduced taxes on the unearned increment from speculative land sales that in 1911 was briefly supplemented by a national land surplus tax (Von Saldern 1988:85).

It would be wrong to assume that for all these reasons German cities would not have had a private market for urban land. Contemporaries lamented repeatedly that artificial land speculation would drive up prices. Furthermore, building land could be had without asking feudal landlords for building favors (*Baugnade*). Yet, part of this tradition survived in the firm grasp of municipalities on building land demands and the requirements that went along with new constructions. Moreover, the strong market shares of universal-bank financed large land societies and municipalities themselves made urban building land certainly not as easy to access for small suburban settlers as in American cities.

A final relevant distinct feature of German municipalities was the so-called municipal socialism, the public management of local services and utilities envied by foreign visitors by 1914 (Dawson 1914; Rogers 1998). Social municipalism refers to the city-ownership and strong control of water, sewer, gas, transport and electricity systems in the majority of German cities up to WWI. It moreover concerned a variety of other domain ranging from the traditional welfare for the poor to public theatres and museums. By WWI, municipal ownership and provision with these services were most advanced in German cities (Pinol/Walter 2003:189ff). In the shadow of the conservative national welfare state, a local welfare state in domains of the so-called *Daseinsfürsorge* (basic public services) developed under the lead of strong local mayors using growing and professionalizing administrations. The American progressive idea of

efficient managers modeled according to private enterprise found some incarnation in the prosperous German Empire cities (Schaefer 1994). Citizens and the local elite identified with their cities as expressed in generous public buildings, especially city halls, and a competitive spirit towards neighboring cities. All this accounts for the fact that major suburban flight of urban dwellers – with the exception the so-called colonies of villas of the very upper class (*Großbürgertum*) (Bodenschatz 2001) – did not take place and considerations of economies of scale of the municipal network enterprises in city politics, but also property owners' fear of declining real estate prices in case of strong suburbanization did reduce uncontrolled city sprawl.

This centrality of cities also implied their dominant position vis-à-vis the neighboring towns whose population began to grow even more rapidly and at the cost of the central cities towards the end of the century. Larger cities mostly reacted to this constellation by incorporating the surrounding suburbs that did not have any say in the process which was eventually decided on the state-level but at the instigation of the incorporating city. For the latter the issue was not only one of re-incorporating possibly wealthy citizens, gaining more regional and tax control, but the incorporation could come at the cost of extending the public services to a wider area. At the same time, incorporation also allowed local landlords to regain control over the city's housing market. For the suburbs, the trade-off was often between being connected to modern services and the loss of self-government and tax authority. The overall result was an evening out of service provision across the city area at the cost of local democracy. This development clearly contrasts with developments in the US where the suburbs often remained an exit-option from equalizing city tendencies and where incorporations stumbled upon a strong sense of local self-determination (Nolte 1988). In the case of Boston, historians also referred to this tendency as fiscal balkanization (Edel/Sclar/Luria 1984:51).

It appears to be surprising that city construction and provision of accessible housing did not become a part of the expanding municipal socialism but the overall commitment to non-market housing provision remained far behind what contemporary reformers had expected from cities (Von Saldern 1988). Although cities increasingly supported non-profit housing associations by acquiring shares, providing cheap building land or capital, setting up secondary mortgage institutions[19] etc., they did not – with the exception of three cities and the construction for city employees – construct low-cost housing on a massive scale themselves like their British counterparts.

[19] I.e. institutions lending a riskier second mortgage beyond the commercial first mortgage that normally covers 60% of the property value (also see 1.2). Not to be confused with the resale of primary mortgages on so-called secondary mortgage markets as instituted in the US in the 1930s.

One of the reasons certainly lies in the extensive expenses municipalities had for the many *Daseinsfürsorge* institutions. Though many of the municipally owned facilities became supplementary sources of income, they required heavy initial investments in facilities and network structures whose amortization could take decades. The degree of municipal indebtedness by WWI supports this hypothesis, which nonetheless does not explain the contemporary reformers' and even district governors' impression that municipalities stayed below their capacity with regards to housing policy. While the Prussian and national housing law projects were 20 years in the making before passed in 1918, housing remained officially a competence of municipalities whose reformer circles themselves, however, tried to move states to pass national laws (Ayçoberry 1986). Several states had set up subsidy programs directed at municipalities or building cooperatives through their public banks prior to WWI (Pergande/Pergande 1973:51).

This firm grip on urban land regulation and municipal enterprises was considerably eased by local electoral rules in favor of maintaining a liberal property aristocracy with interest in lucrative rental housing developments in the city outskirts, orderly city development without attracting too many poor by cheap housing (Krabbe 1984:44). In the authority governed Prussia-dominated Germany, cities were the political refuge and bastion of national and economic liberalism. The Stein-Hardenberg reforms of municipal government had put local power in the hands of the propertied classes following a municipal code that – but for southwestern Germany – was similar in non-Prussian German states: eligibility for voting and for office depended on indicators of wealth or income. The Prussian peculiarity moreover was the so-called house-owners' clause which made a rate of 50% house-owners amongst aldermen mandatory, the main argument being that whoever paid most to sustain the community via taxes, cared most and could best administrate the city. In many cities this specific clause would not have been necessary as being house-owner and belonging to the eligible propertied classes coincided strongly (Lenger 2009b:93). The effect of these electoral rules was a considerable overrepresentation of house-owners among councilmen as the number of house-owning councilmen rose for eastern cities though homeownership tended to be lower in Prussia. At the same time the clause meant an additional obstacle for social democrats entering the city council (Baron 1911). In cities with dominant house-owning councils, taxes imposed on house-owners and overall tax revenue also tended to be lower (ibid.).

Through earlier universal suffrage also at the local level, the control of the property owning elite over their city was much more incomplete in other countries like the US where local politics soon gained the reputation of being dominated by ward-based, favor-distributing representatives of political machines that bought immigrant votes through clientele politics. Not

accidentally did American local elites, though in vain, seek to re-establish local property-based electoral rules, inspired by the German example promoted by Progressivists like Richard T. Ely (Schaefer 1994:78); otherwise, their commitment to the home-town was much more secluded to club goods and philanthropy than acting through the city council (Hall 2002:178ff; Beckert 2001:268ff).

From all of these aforementioned reasons, feudal shackles and particular city politics, did German cities at the fall of the Empire represent the dense tenement cities that the Board of Trade described. The first national housing count of 1918 mirrors this particularity when it finds 87% of the population of Germany's 93 largest cities living in buildings of three and more dwellings units, 36% even in those of nine and more (RWZ 1918). Densely populated compact cities of tenement buildings are of course not sufficient to account for low HRs as high-homeownership countries in southern Europe look back on a long history of urbanization and display some of most densely settled cities of high-rise buildings today (Vandermotten et al. 1999:47ff). Also, there was already a homeownership gap between these and the German-speaking countries of at least 15 percentage points by 1950. One of the crucial differences between these groups of countries consists in the historical and legal tradition of apartment ownership.

Apartment ownership

Hoekstra interestingly observes that in southern European countries in 2001 the association of owner-occupation and apartment buildings is much more frequent than in all other welfare regimes, an association also present in other lately urbanized Asian countries (Hoekstra 2005). In other words, although countries like Italy and Spain share a relatively high number of housing units in high-rise buildings, much like in Germany, their ownership rate is on a level with Anglo-Saxon countries or even higher.[20] Hoekstra does leave unmentioned, however, that the German-speaking countries are almost on a par with most southern European countries when it comes to apartment units in the overall housing stock.[21]

[20] Scotland is the one Anglo-Saxon country that also witnessed tenement cities such as Glasgow or Edinburgh and also there private flats were sold off separately after WWI thanks to a flat-ownership tradition (O'Carroll 1997:235f).

[21] The overall story of about regional fragmentation, belated nationalization and city-planning which I applied to the German case shares at least some similarities with Italy and Spain and some cities therein (cf. Fehl/Rodriguez-Lores 1980).

Figure 5: Building stock structure in various countries

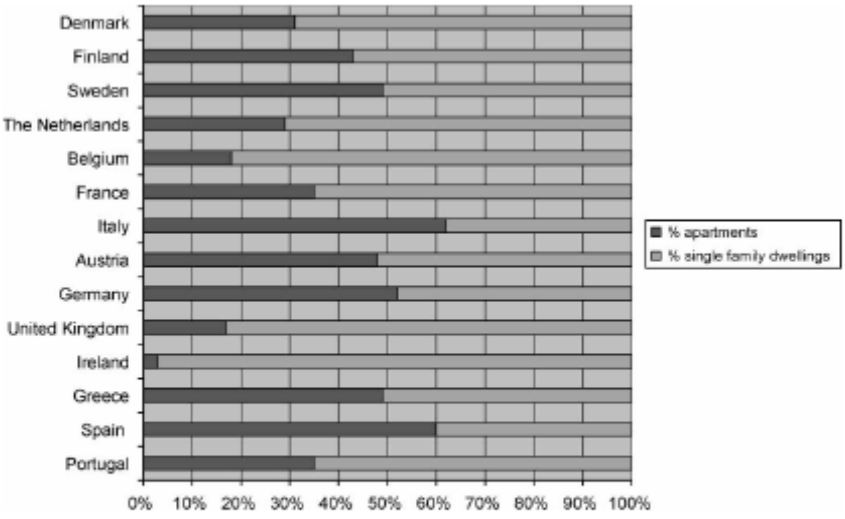


Figure 1. Proportion of apartments and single-family dwellings in 14 EU countries in 2000 (Sweden) and 2001 (all other countries). *Source:* European Commission, Eurostat, European Community Household Panel (ECHP) 2000 and 2001 (UDB).

Source: (Hoekstra 2005:481)

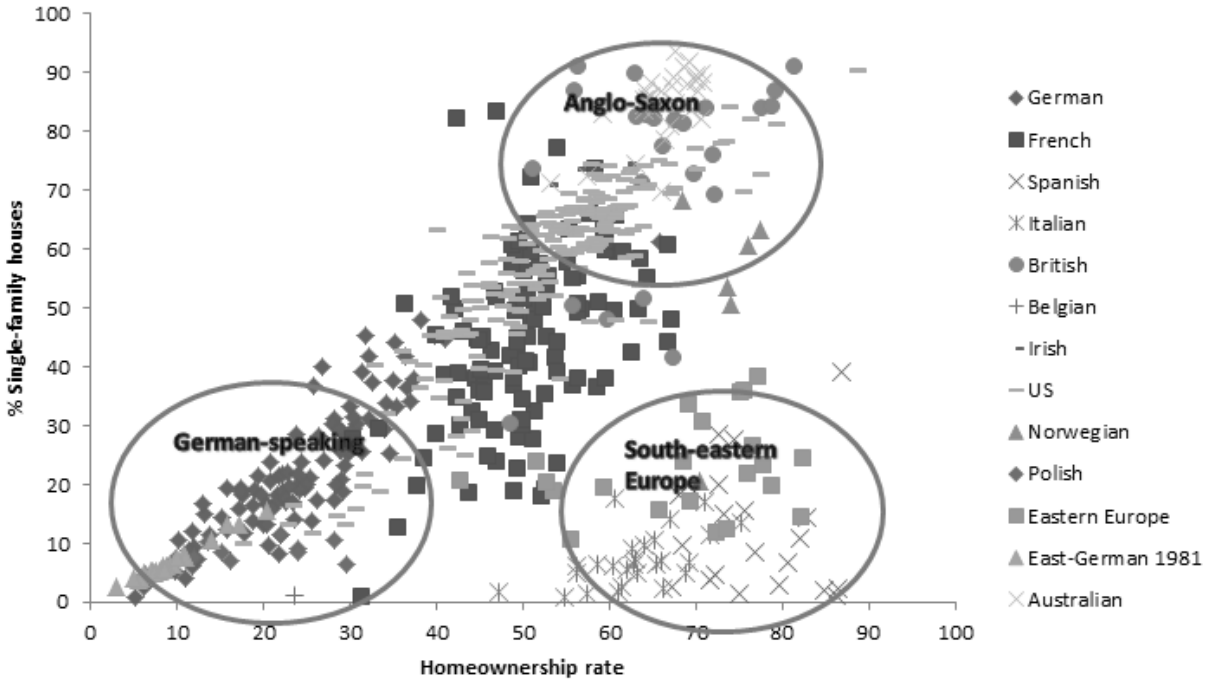
If one combines this finding about the dwelling structure *and* the homeownership composition, then an interesting classification of three ideal housing structure types results, according to the quadrant that a country's large cities fall into.[22] The lower left quadrant reflects the German city type, low homeownership and high apartment-house rates, which diametrically contrasts with the upper right quadrant where northwestern Europe and Anglo-American cities figure prominently as having high homeownership and high single-family house rates. Historic GDR-cities, included as example for cities of the quite homogenous socialist type in general (French 1979:101f), mostly added multi-unit dwellings to the historic stock and therefore even appear at the lower left end of the city-group in German-speaking countries.[23] On the other diagonal one finds the southern European cities, as noted on the national level by Hoekstra, having high flat and homeownership rates; cities in most formerly socialist countries moved horizontally in this quadrant after the collapse of the Soviet Union, when the state- and cooperative-owned housing stock was given at no or only moderate cost to the sitting tenants in the course of privatization policies, while often not restituting former private landlord property rights. The vacant upper

[22] Cities with more than 50.000, mostly more than 100.000 inhabitants. The following results can be seen as controlled for population, as a multiple regression shows cities' HRs to be independent of the population size.

[23] The number of owner-occupiers has not been recorded in GDR statistics, only the type of ownership (state, cooperative or private) and the structure of the building stock (buildings containing one, two and more units). The number of privately owned units is not identical with the number of owner-occupiers because they mostly refer to privately owned central-city rental buildings in which the private owner might not even live. But as almost no owner-occupation took place in multi-unit dwellings (Rietdorf 1991:130), I inferred the rate of owner-occupiers from the number of single-unit dwellings and half the number of two-unit dwellings, supposing that owners themselves lived in many of these two-family houses, often subdivided one-family houses.

left quadrant, cities filled with rented single houses, have historically existed in some parts of Great Britain such as Sunderland or Chester-le-Street (Daunton 1983:40) and in some company towns with employer-landlords. But also in historic American cities lower homeownership rates went along with privately rented single-family houses. The historic change reflected by the horizontal move of city-points to the right will later be referred to as "conversion," i.e. the transformation from rental into owner-occupied tenure within the existing building stock, while the historic change reflected in a rightward move along the main diagonal reflects what will later be referred to as "layering", i.e. the suburban growth of cities along owner-occupied single-family houses.

Figure 6: Varieties of urban form and tenure



Source: Eurostat urban audit, calculated averages 1989-2012; US City-data book 1994; (Destatis 1994); Australian Population Census

These distinctions are also roughly reflected in geodetic surface data analyses that show large percentages of "continuous urban fabric" for Eastern and southern European countries and more "discontinuous urban fabric" as one approaches northwestern Europe (Vandermotten et al. 1999:91). Although cities of the same country still show some heterogeneity, the relatively homogenous country-clustering of cities is nevertheless pervasive. The differences remain when one chooses the Eurostat "larger region" instead of the rather administrative "large city" categorization which shifts the entire graph towards the upper right quadrant. Note also that not all cities (countries) clearly fall in one of the quadrants. Especially French cities fall into a broad midfield, clearly distinguishable from the German cities through higher shares of houses

and higher shares of owner-occupied flats, but are still clearly distinguishable from the southern European and Anglo-Saxon extremes.

Crucial for the historical building-type path dependency argument is the degree to which new construction of owner-occupied apartments or conversion of existing rental units into owner-occupied ones took place in the form of co-ownership institutions. Any deviation to the right side from the diagonal indicates the degree of apartment-ownership, while any deviation to the left side has been historically evened out by the easy sale of rented single-family houses to occupying tenants in the Anglo-Saxon countries, once rising incomes and landlords' willingness to sell set in (see Part II).

Historically, the vertically divided ownership of separate units within a joint dwelling was impeded in Roman law by the "superficies solo cedit"-doctrine. The ownership of land included everything below and above it without different owners in the vertical dimension. Of course, joint ownership could still take on the form of some legal entity owning a structure and indeed the legal doctrine of co-ownership was one legal alternative (Thun 1997:24). The origins of de-facto and de-jure apartment ownership in countries of Roman legal tradition remain obscure. Speculation goes that separated apartment ownership in Europe grew out of customs in mountainous areas to jointly own building structures constructed on slopes (ibid. 9). There is evidence to the fact that separate apartment ownership was established as customary right in southern Europe, in Alpine regions and medieval towns. Also, in Scotland a long flat-ownership tradition is known (Niven 1979:22). In France, cities with the highest numbers of owner-occupied apartments today such as Grenoble or Rennes usually have a century-lasting tradition of this institution, ranging back to 1720 in Rennes, for example, when after a great fire apartment buildings were re-constructed with joint capital and then passed on through generations (Raymond 1971). In the 19th-century the number of co-ownerships of apartment buildings generally decreases in France and Germany as renting becomes an interesting option for landlords. In France this becomes clear through an increase in apartment-ownership beginning in the interwar-period when rent restrictions motivated landlords to sell their units (see Part III).

In 19th-century Prussia and most of northern Germany, contrary to the French Civil Code, apartment-ownership was legally not explicitly mentioned but the custom persisted until the introduction of the 1900 Civil Code prohibited it, the main argument being the disputes and mismanagement that accompanied this form of housing tenure (Thun 1997:136ff). In the course of the 19th-century German legal discourse and jurisdiction, reviving Roman origins, had successively grown to oppose separate ownership. In the interwar-period, the re-introduction of the legal form was also discouraged by the argument that tenant protection procured already

quasi-property guarantees to tenants. In 1951 today's apartment-ownership law was introduced in Germany with the idea to democratize property and to mobilize more private capital for construction (Hunger 1982:122f), but it took several decades for the apartment stock to grow again after half a century without new apartment-house construction and the gradual disappearance of existing legal arrangements. The historically absent apartment ownership (*Stockwerkseigentum*) in German-speaking countries in general and the close association of building and tenure type in all but southern Europe and Scotland creates the link of Germany's 19th-century tenement cities and today's low homeownership levels. In countries with stronger established flat-ownership institutions such as Scotland (Morgan/Daunton 1983:282), the sale of individual units to former tenants – undertaken to evade rent control or just to realize capital increases – was more probable.

1.2 Housing finance differences

But before following the lines along which the once created inert urban structures have persevered through time, an important component of the urban production requires mention which systematically differs across countries, namely the specialized institutions of housing finance. Without the special characteristics of the housing finance development, municipal politics and higher land prices alone would not have resulted in the large construction of tenement buildings. Housing, like many durable goods, requires capital investments that go beyond usual consumption expenditure and, much like larger infrastructural investments, requires therefore high shares of borrowed capital. Compared, however, to rates of profit to be made in other industries housing has usually been only of secondary importance and therefore in permanent need of more capital, especially in times of general scarcity. Before governments intervened directly in housing finance through either mortgage guarantees, interest and amortization subsidies or direct public loans, there were two ideal typical ways to provide for private housing capital: to create specialized local circuits of housing capital shielded from competition or to access larger capital markets of mostly risk-aversive investors, competing with government bonds. Corresponding institutions to these two ideal types traditionally were saving and loan societies (SLAs) in the US, the German *Bausparkassen* and building cooperatives, on the one side, and mortgage banks in both countries on the other. SLAs, originating in England, collect local money from members (later also: external savers) for the purpose of granting individual loans to members (later also: external borrowers) (Price 1958). Building cooperatives, in turn, are equally owned by members who contribute capital

collectively in order to have the cooperative built their housing units, either individual or collective. In contrast to the misnamed British *building* societies or American SLAs[24], building *cooperatives* constitute a separate entity commissioning or even constructing its *own* housing units. Even though they also pool capital for housing construction, they are not a housing *finance* institution in the narrow sense, but rather fulfill the role of a builder and landlord borrowing considerable sums. I nonetheless include them in this juxtaposition because they constituted an institution competing with the SLA-type of institution and countries systematically differed in developing either one or the other institution as main housing institution prior to WWII. Finally, mortgage banks issue bonds, backed by mortgages on property, to sell them to a wider capital market to refinance their mortgage lending. They require a certain standardization of the mortgaged property as well as investors willing to hold these lower-risk, lower-interest bonds.

Historically, countries differed to the extent that they institutionally organized their housing finance before states began to intervene considerably in the housing sector between 1920 and 1980. Whereas the US grew into a SLA and saving banks dominated housing finance regime that was to receive government guarantees for extensive primary mortgages and a secondary mortgage market in the 1930s, Germany developed strong mortgage banks and building cooperatives already before WWI, whereas the SLA counterpart, the *Bausparkassen*, did not come into being before the late 1920s to specialize in secondary mortgages, covering the 50 to 70% loan to value ratio only.

The upshot of this three-fold distinction of housing finance institutions into SLAs, cooperatives and mortgage banks is that they do not act as neutral channel through which saving capital flows into the housing sector but that they establish selective circuits either more in favor of rental constructions of larger tenements or of small houses for owner-occupiers. Not surprisingly, the American SLAs will be shown in Part II to have furthered a homeownership circuit as much as the belated *Bausparkassen* in Germany, while the German mortgage bank and cooperative non-profit housing circuits have privileged private and public rental housing, respectively. The correlation between finance institution and building or tenure type is nowhere perfect, but historically well-supported and sometimes even legally prescribed. With the extension of retail banking, banking concentration and the end of much specialized banking beginning around 1980 (Diamond/Lea 1992; Ball 1990), the argument of an autonomous effect of housing-finance institutions on building and tenure types grows successively weaker. But for

[24] The American savings and loan associations (SLAs) harmonized their name only by the 1930s and went previously under many different labels, mostly building societies or building and loan associations (BLAs). For reasons of simplicity, I refer to this *type* of institution interchangeably with both expressions.

the path dependence argument offered here the persistence of these institutions nowadays and, more importantly, the persistence of much of the housing stock and urban structure their historic mortgage capital went into suffice to ascribe them a historical causal role in the creation of long-lasting homeownership differentials.

In this section I thus argue that it was this specific constellation and sequence of housing-finance institution development that contributes to the explanation of Germany's lower homeownership rate. I further argue that these institutions, emerging prior to first government interventions in housing, preempted the lines along which government policy only reinforced existing regimes. Concretely, I show how German mortgage banks became complementary agents of large-scale tenement construction, how an established network of cooperative and local public banks impeded the emergence of specialized housing banks before the 1920s that only then emerged as member-based finance institution with ex-ante savings, leading to the high German equity rate, higher age of first-time home buyers and Germany's higher savings rate. Government intervention consisted accordingly in giving out construction subsidies to housing associations and subsidizing the ex-ante savings of the *Bausparkassen* members. The post-war periods witnessed more state housing finance and a retreat of the traditional mortgage institutions, but the main institutions earmarking money for housing and for certain housing types persisted. The 1970s' high inflation and finance liberalization dissolved many special housing finance circuits and reduced institutional differences (Ball 1990:1) whose legacy, however, still remains in the building capital it brought about.

The rise of mortgage banks

Mortgages were traditionally made through personal or business credit networks and bank-organized mortgage lending has only gradually come to replace these traditional circuits in the 19th and 20th-century. The origins of modern German mortgage banks as oldest institution of the modern organized mortgage market reach back to the aftermath of the Seven Years' War when Prussian rural noblemen were in urgent need for capital (Clark [2006] 2007:194ff). Frederick the Great obliged local landholders to enter associations of debtors, the *Landschaften*, in which both the individual properties and all landholders mutually backed a mortgage bond that the individual debtor himself had to sell in order to receive capital. "In exchange for the compulsory membership, all members of the Landschaften held a 'right to credit', so the *Landschaft* could not discriminate against individual estates. Therefore, a key to prevent adverse selection was the determination of the credit limit and the correct assessment of the estate to guarantee collateral"; the assessors were even personally liable for losses due to too generous assessment (Wandschneider 2013:11). Both these conservative lending standards and

the trust in the monitoring of the local landholders enabled the holders of larger estates to go into considerable mortgage debt, whereas small land owners were usually discriminated against in these *Landschaften*. It also meant the creation of an organized credit system in times when personal loans were still the most common form and it established a special circuit of finance for largely agricultural purposes. The *Landschaften* maintained roughly 20% of the mortgage market, dominantly in rural areas and served as example for Scandinavian mortgage banks and the French 1852 *Crédit Foncier* that in turn became the example for the German mortgage stock banks: private banks issuing individual first mortgages held on their books and financed through the sale of bonds (*Pfandbriefe*) of matching duration (Schönmann 1993:826ff).

Mortgage banks were not granted a legal form prior to the 1850s as the Prussian state feared another strong rival for its state credit next to the growing railway and industrial bonds (Redenius 2009:73). Most of the mortgage banks were then founded between 1862 and 1872 as private stock companies to finance the expanding city construction. In 1872 mainly agricultural forces pressured successfully to harmonize the different mortgage laws and allow for inter-state credit flows in Germany (Eberstadt [1909] 1920:387). "Whereas in 1865 the volume of private mortgage bank mortgages amounted to the modest sum of 66 million Marks, with *Landschaften* reaching 470 million, in 1900 it had increased to 6,9 billion, exceeding the *Landschaften* (2,2 billion) threefold" (Redenius 2009:76). Prussian ordinances regarding mortgage banks prescribed highly conservative lending, thus strengthening banks from more liberal southern states until troubled banks and market transparency problems motivated the 1899 federal law that legally established mortgage banks as the only issuer of *Pfandbriefe* (only abolished in 2005), lending at a maximum of 60% loan-to-value-ratios (LTV)[25] which underpinned their reputation as offering long-term investments of equal stability as government bonds (Schmidt 1993:1026ff). As *Pfandbriefe* were traded on German stock exchanges, mortgage banks did not need to be situated in the lending region nor issue *Pfandbriefe* there. Indeed, the expansion of Berlin and other Prussian cities was largely made possible at first by non-Prussian banks (Eberstadt 1901:140).

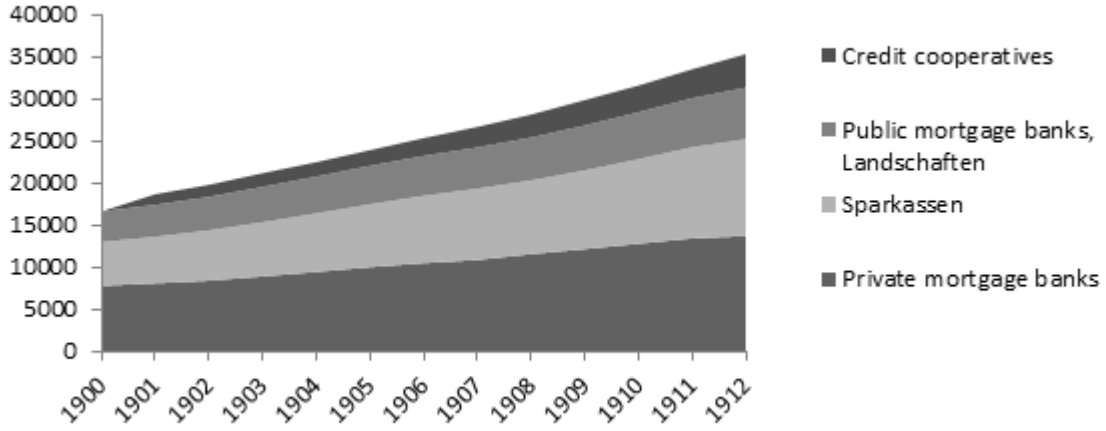
The roughly 40 private mortgage banks grew to be the biggest financer of private urban constructions during the Empire with 95% of their mortgages being made in cities. Undoubtedly, the mere economics of more expensive urban land and the corresponding demand of clients for tenement mortgages shaped their business, but some characteristics of their own made them a functional complement of private tenement construction. First, whereas mortgage banks issued bonds in relatively small shares to attract more demand among

[25] The LTV-ratio indicates the percentage of the mortgage on a certain property in relation to the property's estimated value and reflects usually the value the lender can expect to recover in a possible foreclosure.

institutional investors and wealthy bourgeois, they preferred to give out mortgages of higher nominal values. Contrary to the other big source of mortgage finance in the Empire, the savings banks (*Sparkassen*), mortgage banks could not count on a diversified network of branches to serve small customers with amortizing mortgages (Eberstadt [1909] 1920:424f). The administrative costs for smaller mortgages and regular amortization payments (and non-payment sanctions) would have been much higher, moreover, the relatively frequent trade in land or tenement buildings made non-amortizing mortgages more attractive as they could be passed onto the buyer more easily (ibid. 402).

Secondly, contrary to cooperative banks or *Sparkassen*, mortgage banks were not tied to investments in certain regions. Their lacking branch system implied less knowledge of local conditions and in its evaluation guidelines even mistrusted possibly corrupt local evaluators (Frederiksen 1894b). Instead, they had to rely on more standardized ratings based on the most standardized product in urban construction – the tenement building – while otherwise following conservative lending standards (Faller 2001). The stereotyped rental building, much criticized from architectural and city-planning points of view, served much better purposes from a banking perspective. Finally, mortgage banks, having to pay continued interest on their bonds, had to give out loans to income-generating objects best found in the continuously flowing rent payments, as codified in the mortgage banking law (Frederiksen 1894a:233; VdH 1999:39). The mortgaging of single-family homes were only an exception in the German southwest (Fuchs 1929:47).

Figure 7: Pre-WWI mortgage market volumes in million Marks



Source: (DeutscheBundesbank 1976) via Gesis; volume of *Pfandbriefe* for the public mortgage banks; *Sparkassen*-mortgages calculated as Prussian percentage of mortgages as part of German *Sparkassen* assets; all credit volume for the credit cooperatives

In addition, partial data about life insurances show that, in 1912, life insurances held 4,4 billion Marks in mortgages, often *Pfandbriefe*, almost all on urban properties with rental buildings (Blumenthal 1932:36). Traditionally investing in long-term agricultural estates, insurances became an important source for urban real estate investments during urbanization, while both their share in the mortgage markets and the mortgages' share in their assets declined after WWI due to alternative investment options in government and industrial bonds; in comparison to other countries, German and Swiss insurances continued to invest more into mortgages than their counterparts (Beer 1993:1148ff).

By WWI, the privately organized sector of mortgage lending had grown to an estimated 54% of the entire mortgage lending, with personal relationship still playing a considerable role (Lütge 1949:355). But compared to per capita values in Belgium or the Netherlands (Eberstadt [1909] 1920:393), the German mortgage indebtedness was (more than) double the size and it was more institutionalized than in the US (an estimated 25% in 1892) (Frederiksen 1894a), with LTV-ratios of primary and secondary mortgages combined reaching values as high as 90% in big cities (Kämper 1938:106).[26] The volume of *Pfandbriefe* in circulation around 1900 was roughly five times the French circulation (Eberstadt 1901:232). Mortgage banks, even though the youngest financial institution, became the prime lender of mortgages in the Empire and of urban mortgages more particularly; in 1913 they occupied 18% of the entire German bond market in spite of heavier pre-WWI government borrowing (Borchardt 1971:125). Through institutional investors they tapped broad non-local capital markets, but chiefly channeled the collected money in form of bigger loans into the housing sector, much like insurances or the bigger commercial banks in the market for short-term loans (Eberstadt [1909] 1920:424). Much as Gerschenkron considered universal bank as the essential motor through which the late industrializer Germany could mobilize large sums of capital to finance newly emerging industrial giants, mortgage banks can be considered as an analogous institution to catch up in urbanization and city-building (Gerschenkron 1966:14; Tilly 1998).[27] In Saxony, for instance, average mortgages ranked between 60-124.000 marks, whereas *Sparkassen* only reached 11.000 (Pohl 2005:52). At the same time, once tenement construction and not construction of smaller housing unit shares had been established, they became the necessary part of the urban real estate as few landlords were able to buy entire tenement buildings on equity. Relatively

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[26] In the light of calling Germany a bank-based and the US a market-based finance system for *company* finance (Zysman 1983), it is interesting to note that the *housing* finance constellation for the two countries is reversed: German mortgage-banks channeled money from the anonymous capital market into the housing sector, whereas local deposit-banks dominated in the US.

[27] The origin of the modern type of these institutions, Paris of the 1850s and the Péreire-bothers foundation of both a new investment and mortgage bank, also speak in favor of this analogous banking structure.

frequent sales of tenement buildings – in 1910 Berlin roughly 50% had been bought in the preceding ten years (Leiske 1914:28) – made permanent mortgages necessary.

Sparkassen – the origin of deposit-based mortgage lending

The biggest rival in urban mortgage lending were the *Sparkassen* whose comparatively high share in the mortgage lending market in the 20th-century has also been noted as a German particularity (Ball/Harloe/Martens 1988:142). *Sparkassen* had been established in the late 18th-century for philanthropic reasons to grant poor people savings and small credit opportunities (cf. Seikel 2012:82ff). Usually attached to municipalities and government districts, they began to grow out of these narrow confinements to become local people's banks, collecting small deposits and being restricted to local lending activities, mainly lending in real estate, to the municipality and investing in government bonds. Contrary to mortgage banks, therefore, *Sparkassen* depended on deposit collection for mortgage lending but contrary to SLAs they could not count on contract-based saving nor were the deposits earmarked for residential mortgage lending only.

"Investing saving deposits in mortgages has been regarded as the most adequate form of *Sparkassen*-investments prior to the War; in 1913 around 63% of their assets were invested in mortgage credit" (Pohl 2005:69), leading individual states in search of war finance to restrict overall mortgage investments by *Sparkassen* to 40%, such as in Prussia 1912. As municipalities themselves had to rely on debt-financing to master the infrastructure revolution, funds of the municipally controlled *Sparkassen* were uncontestably going in local real estate. The high share of first mortgages in the *Sparkassen*-portfolio and in the overall mortgage market could suggest that their role would have been a perfect equivalent of the American SLAs: an institution collecting small deposits to grant common people access to cheap mortgages to buy local real estate. *Sparkassen* did indeed play a similar role by addressing small savers and customers, depending on their deposits and granting much smaller and accessible mortgages than the branch-lacking big mortgage banks or insurances. In fact, controlled for various factors, *Sparkassen* deposits per capita have a positive influence on homeownership rates (and the amount of family-dwellings) in a sample of large German cities in 1912 (see appendix 1). In addition, Pohl mentions a rough negative correlation between the percentage of *Sparkassen* investments in mortgages in a city and cities being dominated by tenements (Pohl 1998:35). By 1929 *Sparkassen* had collected six times more deposits than life insurances held capital (only two times in the US) (Blumenthal 1932:19).

All this could suggest that *Sparkassen* were the pioneers of homeownership in the Empire. Their importance in this respect, however, must be much more nuanced. First of all, not all

mortgages were taken out in urban *Sparkassen*, suggesting many hidden agricultural and less residential mortgage loans. In 1911, Prussian *Sparkassen* invested 35% of their assets in urban mortgages and 20% in rural ones. Secondly, much more than in the case of mortgage banks, taking out *Sparkassen* mortgages did not imply investing in real estate. As personal credit was not introduced prior to 1908 (Seabrooke 2006:92f), people had no other means of investing in one's local business, of paying the dowry or distributing inheritances than to mortgage their property (Pohl 1998:33). Thirdly, and contrary to the SLAs, *Sparkassen* did not invest all deposits in mortgages only, but municipal financing and government bonds were equally important, especially after WWI. With this respect, *Sparkassen* were just not member-based associations such as the SLAs but served the command of their founders and guarantors. Fourthly, also *Sparkassen* showed rather conservative lending behavior and did not give out as small share of mortgages as they collected deposits (Scholze 2004:49); in other words, the democratization of saving access was not paralleled by the democratization of access to mortgage credit. The first individual mortgages to workers are reported as late as 1904 and considering the fact that the secondary mortgage offer gradually wore out prior to WWI, not much labor homeownership could have been produced by them. One of the reasons was that parts of the overall deposits had to be invested in gilt-edged securities, low-risk investments, which is why the Prussian *Sparkassen*'s LTV-ratio was restricted by a law of 1838 to a maximum of 50% (Kämper 1938:88). In fact, the contribution of *Sparkassen* to housing the lower classes was much more along the lines of the social security funds, sketched below, i.e. providing not individuals but non-profit associations producing low-cost housing with the necessary funds, often guaranteed by the municipality (Zügel 1993:989). The funded associations, however, were not necessarily channeling their members into homeownership, but constructed rental units. Overall, a reform-minded author said, the *Sparkassen* also preferred mortgaging rental barracks, not individual workers' properties or cooperative buildings (Dallmann 1933:182). The larger shares in which mortgages were made corresponded moreover to the building structure of tenements, not divided into separately owned flats. Thus, the average selling price of a 1900 building in Munich was around 90.000 Marks, with annual wages of a skilled worker estimated at 800-1000 Marks (Neumeier 1995:359ff), leaving an enormous gap even for the investing petty bourgeoisie, insurmountable without considerable mortgage debt.

The non-profit housing association versus SLAs: critical juncture in housing organization

Sparkassen were therefore far from being a German copy of American SLAs, aggressively promoting individual homeownership. They rather grew into a complementary financing

institution of the circuit of non-profit[28] housing associations consisting of limited-dividend associations and cooperatives. Strictly speaking, the latter are not a financial institution such as mortgage banks or *Sparkassen*, but a real estate institution engaged in commissioning constructions of dwelling units, managing and renting, buying and selling them. They are mentioned nonetheless in this context because, on the one hand, they became the primary addressee of social security funds that emerged as another particularly housing finance institution in 1889. On the other hand, I juxtapose them as particularly German institution with the financial institution of the American SLAs whose lifecycles are surprisingly similar across the 20th-century. They merely constitute two different forms of how individuals can associate to the end of jointly providing housing units for themselves. In the case of SLAs, individuals form a member-managed cooperative, mutually obliging themselves to save to then profit from a member-provided loan whose interests must be served. Whereas savings are collected into a common pool, loans are withdrawn individually and likewise the construction takes place individually. This is why the SLAs remain in the domain of a purely financial institution. In opposition, the building cooperatives draw together members in need of housing and their membership contribution which in turn – complemented by external funds – is *also used collectively* in that the cooperative builds for the members, either individual housing units sold via a renting-buying scheme or rental units held in the cooperative's ownership. Both types of association exist in a terminating form – after the successful construction and amortization it is dissolved – or the permanent form in which SLAs survive as financial institutions and building cooperatives as non-profit landlord institutions.

This basic difference in associational form is worth mentioning because it does not only mark a difference of 19th-century German and American associations, but it equally applies to other Anglo-Saxon homeowner nations including Belgium, on the one hand, and central and southern European nations, on the other hand (Lenger 2013:140; Boléat 1985:13). Furthermore, as I argue below, this difference in associational form partially preempted the lines along which the 20th-century state decided to intervene in the housing sector. It is therefore interesting to look at the factors that impeded SLAs from rising and that furthered the rise of non-profit associations in Germany.

The idea of disciplining thrift of workers through associating them in a SLA to the end of cottage-homeownership was historically not unknown in Germany. The conservative reformer Victor Aimé Huber mentioned the institution for the first time around 1850 and both statisticians like Ernst Engel and members of the Manchesterian *Kongress deutscher Volkswirte*

[28] The term "non-profit" should be read permissively as "not demanding market rents" and not narrowly as "having no surplus beyond cost coverage."

spoke in favor of it (Müller 1999:48ff). Very few examples of SLAs in Germany, however, are reported prior to their successful establishment in the form of the *Bausparkassen* in the 1920s. In the two individual cases of pure SLAs, the survival ultimately failed due to members not paying regular contributions and due to general lack of capital (Müller 1999:54f). Also, in 1904, building cooperatives themselves decided to not rely on regular savings plans of their members to finance building construction, but rather to rely on external sources (Lütge 1949:271).

More generally, the precocious and widespread development of *Sparkassen* in more urban regions and credit cooperatives for the middle classes as rural *Raiffeisen* banks and urban *Volksbanken* from the 1860s onwards implied a closely meshed net of deposit-collecting branches that covered Germany's possible savers. By WWI, there were more than 3000 *Sparkassen* surveyed, the rural cooperatives had almost two million members and there were more than 2000 urban cooperatives with over a million members (Kluge 1991:89); in 1884, the national postal banks constituted a yet other branch-based rival to attract small savings. By 1914, roughly 19.000 credit cooperatives also constituted the largest part of the cooperative movement (Aschhoff/Henningsen 1995:30). The founders of both types of cooperatives, Schulze-Delitzsch and Raiffeisen, were motivated by liberal philanthropy and social-catholic reasons of including low-income classes in the financial system and in that they absorbed the clientele of possible SLAs. The professionalization of cooperatives, however and in contrast to the SLAs, transformed them more in small and agricultural business institutions for the middle classes who dominated the borrower-side of cooperatives, whereas workers were active in credit cooperatives as savors at the most; skeptical attitudes of organized labor towards the cooperative movement and consumption credits more generally might have played a role, too (Kluge 1991:113).

Another reason for SLAs' absence in Germany, as shown by Daunton for Great Britain's absence of *worker* SLAs (Daunton 1988), lies in the existing network of insurance funds, mostly organized by professional groups as remnant of guild-based welfare systems. These funds served protection functions against the most basic misfortunes of life – accidents, old age poverty, burial funds – and channeled savings that could have possibly gone into housing finance into a different direction. The homeownership-welfare tradeoff, observed for the late 20th-century, has some forerunners in whether more savings went into savings for housing or savings for rudimentary welfare funds that were founded already in the 1830s (Schneider 1989:23). These attracted already two out of roughly four million industrial workers in the 1870s (Kaelble 1991:122), before Bismarckian compulsory insurances set in. These latter already covered 6,8 million health insured, 11,5 million disability insured and 16,5 million accident-insured members contributing 242 million Marks by 1891 (Reuter 1980).

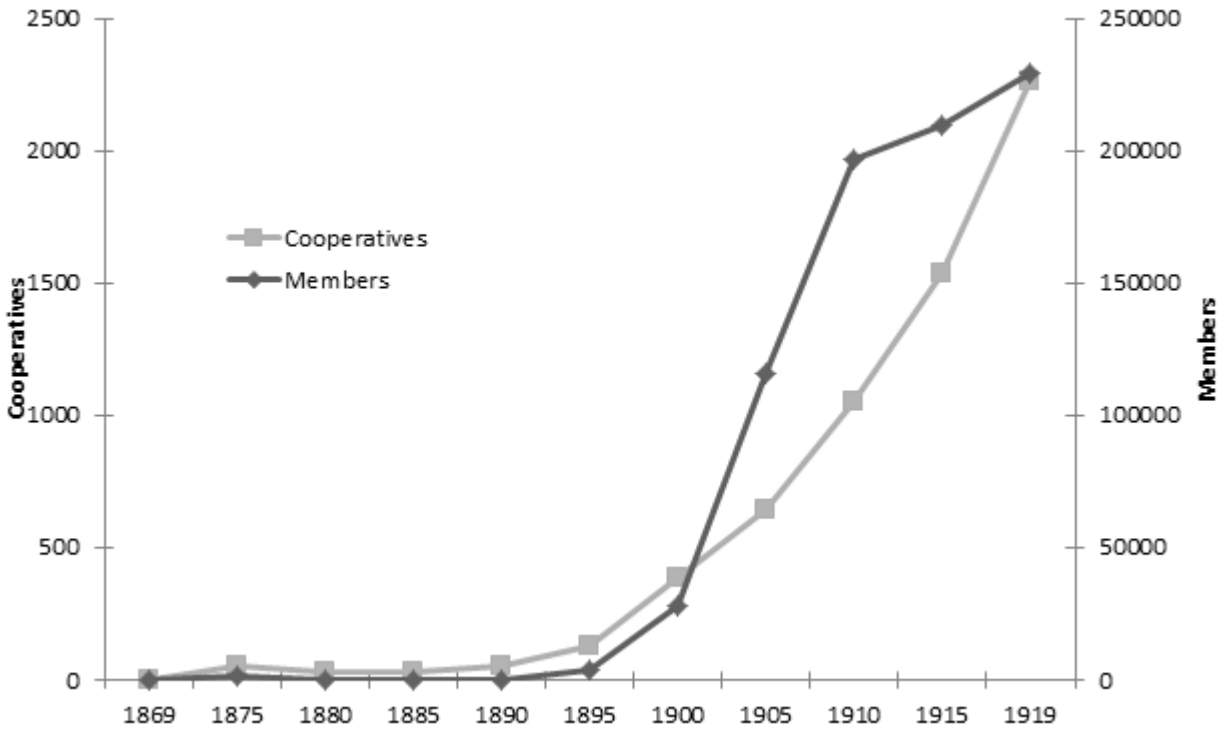
Instead of SLAs, from the time of the post-1848 revolution onwards, the non-profit building association became a more frequent form of association in housing provision (Bühler 1965:11). Until 1889 it was dominantly founded from above in the legal form of limited dividend companies, even with the Prussian king or Russian tsar as protector and capital donator. The reformer origin of many of these companies – inspired by Victor Aimé Huber who had imported British and French reformer ideas in the 1850s[29] – guaranteed them a certain access to the ever lacking capital; lack of capital also was the reason why the original plan to spread cottage-ownership with a rent-to-buy scheme amongst German workers usually ended up in the more economic creation of non-profit rental units (Zimmermann 1991:66), much lamented by reformers who sought to attain home owning workers through British-like building societies (Sonnemann/Lange 1865). The *Berliner gemeinnützige Baugesellschaft* of 1848, for instance, held many buildings with up to ten dwelling units (Jenkis 1973:66). Private capital lacked as mortgages of private rental housing offered as securities by the private mortgage banks could offer much higher returns than the four-percent-philanthropy. But often workers were not willing to tie their little capital to limited-dividend society or cooperative shares as this increased housing costs and decreased labor mobility (Jenkis 1973:97). Cooperatives, the legal form more apt for foundations from below, were also still haunted by the legal insecurity concerning the liability of cooperative-members for cooperative debt beyond their initial contribution. "Jäger recorded that the number of [cooperative] societies had risen to 50 by 1879, but then fell again to only 28 in 1888 and concluded his account by pointing out the painful fact that by 1888 the movement had only built 110 dwellings in the whole of Germany" (Bullock/Read 1985:227). Whereas early housing cooperatives were almost exclusively directed towards the joint provision of owned small houses, the *Spar- und Bauverein Hannover* of 1885 constituted the first cooperative devoted to the collections of savings for and construction of rental units (Jenkis 1973:135ff), a division in the movement that persisted over decades much as the individual cooperatives.

The 1889 cooperative law meant a certain breakthrough also for worker cooperatives as it restricted the liability to the cooperative capital only. In the same year, the old age and invalidity insurance was introduced whose funds were soon to be employed for social purposes in favor of the insured (Tennstedt 1981:187). Both the number of cooperatives and of their members grew, pushed by land grants municipalities were eager to give as they were thus able to refrain from much housing construction of their own. There is evidence to the fact that the

[29] Though his idea of tenant co-ownership of buildings and joint cooperative buildings was meant as a critique of the too atomist British terminating societies where, after joint housing finance, everyone ended up in separate dwelling units (Jenkis 1973:52, 57).

1880s were a time where the path could have either been taken to the cooperatives or to the SLAs with the reform pastor Bodelschwingh founding the "*Bausparkasse* for everybody", thus coining the generic name of today's specialized banks (Müller 1999:57). Its persistent capital problem, its narrow association with ideas of re-agrarian inner colonization through workers' cottages, deemed unrealistic also by the *Verein für Socialpolitik*, and the eventual rise of the competing cooperative thanks to social security funds finally pushed Germany down the cooperative road. The complementary relationship between the compulsory collected social security funds and its use for what was the beginning of social housing construction – non-profit associations constructing mainly rent-restricted units for lower-income classes – was nothing directly intended, as it was not anticipated by the legislators and dropped into the law rather by accident; at first, social insurance funds did not receive any instructions about distribution criteria other than the companies having to be non-profit (Bullock/Read 1985:231f). As a consequence, nonetheless, a steady 31 to 44% of the workers social security funds or a total of 3,2 billion Marks between 1895 and 1913 (Reuter 1980) – supplemented in 1911 by the separate white-collars' insurance financing their own housing cooperative *Gagfah* – went into workers' housing, much of which to the growing limited-dividend companies and cooperatives.

Figure 8: Cooperative number and membership development



Source: (Berger-Thimme 1976:57)

The non-profit housing associations, not even the cooperatives themselves, were no homogeneous sector. In the 1890s the building cooperatives' association split into the cottage-cum-homeownership proponents and the proponents of genuine cooperative ownership of mostly rental housing, representing the divide amongst the cooperatives and limited dividend companies building for rent and those building for ownership (Berger-Thimme 1976:58). While ideological differences subsided, all types of cooperatives disappointed the initial post-1848 conservative and liberal hopes to integrate workers via stable homes into the nation or a new liberal polity. Those housed by cooperatives were artisans or skilled workers at best; civil servants' cooperatives built units of highest rents and government funds rather followed existing cooperative patterns than initiate new ones: "Much of the work of the associations was concentrated in areas such as the Rhineland where there was already a strong co-operative tradition: their success was due in large measure to the character of the areas in which they operated" (Bullock/Read 1985:242), with the regionally operating social security funds (*Landesversicherungsanstalten, LVA*) reflecting these discrepancies in commitment. This underlines the fact that the existing association form rather shaped the state response in housing policy than vice versa. The pre-WWI developments already foreshadowed the later overall prevalence of rental housing units in this housing provision circuit: "Summarizing the situation in 1916, the rather incomplete statistics assembled by Albrecht show that 12,700 dwellings had been built for home-ownership and that this accounted for something like 40 % of all co-operative building" (Bullock/Read 1985:235). As limited-dividend companies slowly tended to build more rental units than the often small-homeownership-oriented self-help cooperatives, the majority of the mostly urban non-profit housing stock (125.000 units) created prior to WWI can be estimated to be rental housing (Kantzow 1980:141; cf. Jenkis 1973:166). Other estimates speak of up to 161.000 units or 1,27% or the Empire's housing stock, while the concentrated construction of new units in cities could lead up to 25% shares in new construction (Kuhn 1998:320).

The *Landesversicherungsanstalten* themselves furthered this tendency for much the same reasons as the other larger organizations of private mortgage capital: centrally organized on a regional level, these new administrations lacked the capacity to deal with many individual claims of workers who moreover constituted difficult risks. Funds had to be mostly placed in guilt-edged assets for which first mortgages were a safe bet; a growing part of the funds also went into *Pfandbriefe* of which the *LVA* even owned 75% after WWII (Borchardt 1971:172). A government audit in 1915 found that 56,5% of all mortgages had been given to multi-unit *buildings* (which contain an even larger stock of units), with urban German states displaying

much higher mortgage attribution numbers (Dallmann 1933:166). To a certain extent the *LVA*'s lending just reflected residential patterns of the insured workers they had the mandate to serve.

The rise of limited-dividend corporations and cooperatives did also preempt the road to an exclusive non-profit housing provision by the municipalities themselves – such as the municipally organized council housing in the UK (Swenarton 1981) – as they could more easily support the already existing cooperatives through land grants, credit guaranties, buying shares or tax exemptions (Krabbe 1984). The connection of municipalities and local limited dividend companies was nonetheless quite strong and the borderlines between municipal and non-municipal ownership were quite blurry.

This constellation led to the belated entry of SLA-like institutions with a clear home ownership focus in the world of German housing associations that, moreover, developed a peculiar form: In 1911 there was a failure in the market for secondary mortgages that generated a serious decline in the construction market as well (VdH 2002:11ff). Secondary and higher-rate mortgages supplemented the primary ones to increase the loan from 40 or 60% of property values to 70 or 80%, thus reducing the equity (or saving time) necessary to realize one's acquisition. Secondary mortgages are riskier because after foreclosure the home might not yield the expected value and lenders of primary mortgages are to be served first. In times of overproduction and falling house prices, both debtors and foreclosing banks cannot sell at the prices desired, secondary mortgages default and the market for further secondary mortgages breaks down. Such a situation arose before WWI when a serious of defaults had made most private investors of the relatively unorganized market for secondary mortgages weary. Landlords themselves founded institutions to mutually guarantee for secondary mortgages and even municipalities intervened by offering secondary mortgages themselves or by stretching the LTV-ratios through their guarantees. Neither alternative could replace the broken-down market and the problem even motivated a national mortgage credit commission, but was left unsolved until the 1920s.

The war practically halted construction and after WWI the private capital market shifted supply to the state and industry until the inflation eroded the mortgage market entirely. In 1924 the government imposed a compensation tax on landlords whose debts were practically eliminated thanks to the inflation (Stratmann 1976:14). This housing tax nourished *Länder* funds to subsidize their first public housing construction mostly undertaken by the old and newly found cooperatives in favor of the lower middle classes and skilled workers. The middle class, as interest rates were high and traditional lending was back LTV-ratios of 40% (Borchardt 1971:135), equally organized new housing finance circuits and at this point savings associations were founded by land reformers. The mindset of founders like Georg Kropp

(Wüstenrot), Heilmann (Deutsche Bau- und Siedlungsgemeinschaft) or Lubahn (Beamtenbausparkasse) was marked by the anti-capitalist idea to establish a special financial circuit, preferentially without interest payments and maintaining the borrower-lender collective.[30] At first much criticized from the competing cooperative movement (Müller 1999:17), they addressed the declining petty bourgeoisie and found many members in the middle class that were not sufficiently served by the existing capital market; workers were rather underrepresented (ibid. 83); civil servants opened associations of their own. Until 1931 more than 400 of these *Bausparkassen* emerged, the private ones soon to be copied by public entities that were annexed to the local *Sparkassen*. These public *Bausparkassen* also established the business model that the industry was to emulate in the 1930s, i.e. a specialization of the riskier secondary mortgage only, which was a natural consequence of the *Sparkassen* already offering the first mortgages. Only 17 *Bausparkassen* were to survive the Depression and WWII, roughly today's number. As they attracted more and more members, the time it took to satisfy individual mortgage needs increased to unbearable levels for many contributing members who were attracted by too promising advertisements (Block 1931:364ff). A law in the 1930s made official what had already become practice among some of the public *Bausparkassen*: a restriction of their business to the secondary mortgage market only, complementing existing banks' primary mortgages that went to 60% LTV (Lehmann 1982:150). To summarize, the German Empire's legacy in housing finance institutions is this: a group of large capital organizing institutions, mortgage banks most of all, emerged as the complementary finance institution of private rental housing in urban regions or the large rural estates; deposit-based institutions such as *Sparkassen*, credit unions and postal banks served rather smaller credit clients and can be seen as precursors of homeownership financing, while still under constraints of urban structure and municipal finance needs; finally, a non-profit housing circuit, supported by social insurance funds, arose as third circuit that, once again, was more dominantly directed towards the provision of rental units. Both the cooperatives as the widely developed savings banks hindered SLAs to rise. Though Germany developed a multi-tiered housing finance system that earmarked capital for housing and even housing of certain types, a SLA-like financial institution, earmarking capital for homeownership and publicly lobbying for it, would not arise prior to 1924. By this time, however, major city extensions, incorporations and transport systems had already absorbed most of the strong urbanization wave and had created the dense physical core structure that became difficult to reverse. This underlines the importance of sequencing effects that path dependence theory has come to

[30] Heilmann, temporary member of the NSDAP, was probably inspired by the later Nazi economist Gottfried Feder who spoke about "shaking off the yoke of interest servitude" (Müller 1999:77).

emphasize. The fact that the German SLA-variant *Bausparkassen* were postmature explains why they became specialized in second mortgages and why only later urban layers could take the suburban-single-family-home form. This clearly contrasts with the American sequence where deposit-based thrifts were first in financing the early suburban spread that was only furthered by the American form of capital-based housing finance, the securitized bonds backed largely by single-family structures.

Excursus: Why did German labor did not adopt land reform ideas?

The cooperative-SLA juncture of the 19th-century has some further roots in the way organized labor and then left-wing parties took up land reform and eventually homeownership ideas. Whereas in most Anglo-Saxon countries worker movements and left-wing parties, from early on, opted for an equal distribution of land, then for homeownership, German labor, by contrast, was far from promoting private ownership of land and homes until the 1970s, when the first national social democratic government in the FDR did not only not oppose ownership but began to actively promote it. Starting from a traditional abstention in the housing sphere, labor around 1900 began to actively support municipal approaches and cooperative movements in the housing sphere. In the meantime, land reform ideas spread among the (petty) bourgeois who equally stood at the origin of the *Bausparkassen* and the homestead movement after WWI. This section traces back the differences in the homeownership-position of organized labor and the institutional counterpart it implied.

The first German trade unions, founded in the 1830s in Paris, then flourishing in Germany from the 1850s onwards, were still influenced by some of the French early socialists idea concerning production cooperatives[31] and the Proudhonian line of thought granting workers the right to small property (Weiland 1988). Often associated in building trades, these workers had the idea to pool joint work and capital to construct individual houses via self-help. Though local solution of this type probably persisted from the late 1860s onwards until the turn of the century, the dominant social democrat position on both the housing and the land question became a revolutionary one elaborated by Friedrich Engels in a journal discussion with the Proudhon-inspired petit bourgeois reformer Emil Sax. According to Engels, there was no solution to the housing and land question within capitalism, only the final (gradual) expropriation would do: “To end *this* housing misery [the one that has concerned all oppressed classes throughout history in like manner], there is but *one* way to go: to eliminate *tout court* the exploitation and the oppression of the working class by the dominating class” (Engels

[31] An early version of Marx’ Communist Manifest still mentions Fourier-like worker palaces (Hunt [2009] 2012:189).

[1872-3] 1973:213). The important revolutionary struggle was to be fought in the realm of work, not the one of consumption because the real surplus value came from labor, not from renting. If workers became homeowners, they would only become the banks' slaves, they would suffer a wage reduction for every decrease in cost of reproduction thanks to homeownership and – directed against a housing-as-security argument – times of economic crisis would also coincide with times of falling house prices. For Engels, the move away from poor country farms to industrializing cities was a necessary step in historical development and every retrograde attempts to re-settle workers on miserable small farms would only de-revolutionize and deprive them of the only asset they had: to remain mobile in the light of exploiting employers and changing business tides.

Engels also criticized proponents of the small *rural* property – as French socialists from their Congress in Nantes 1894 onward – because it would make these small owners believe that parcel ownership could survive in the high tides of capitalism (Engels [1894] 1972). It would further perpetuate a system in which they were usually exploited by usuries or state's property taxes. Engels recommended direct voluntary cooperatives instead. The French socialist position appears plausible in a slowly urbanizing France with fragmented party politics where one could not do without the rural votes. The united German social democrats, on the other hand, could count on being the majority party in the Imperial diet (*Reichstag*) in the 1900s; they did not open up to small business and peasant voters before 1927 (Puhle 1975:34).

The prevalence of this position explains why housing in general did not become a pivotal policy field for the labor party in Germany and it gives some reasons for the absence of homeownership ideas. It remained dominant throughout much of the German Empire during which the main stock of urban dwellings were constructed. The position became challenged from the cooperative wing amongst social democrats (Kampffmeyer 1919) and from the newly emerging municipal socialism wing. The latter, inspired by the British idea of active municipalities owning and managing local companies, proposed a reformist way via the municipalities that should expropriate land, zone it and use municipal resources for the construction of workers' houses (Lindemann 1897). This position, relatively close to bourgeois reformers positions in the *Verein Reichswohnungsgesetz*, led to limited practical results because social democrats were virtually excluded from local politics by electoral rules. German cities, however, came to develop a strong municipal socialism without socialists by themselves (Dawson 1914; Krabbe 1985), though mainly focused on town planning (Sutcliffe 1981); their rather modest involvement in housing policies was to be transformed when social democrats took over many municipalities in the 1920s (Billberbeck 1980). After the November Revolution and throughout the Weimar Republic, the reformist wing became dominant in the

SPD and union-dominated construction cooperatives (*Bauhütten*) became the primary recipient of state construction subsidies and cooperation partners for municipalities who assigned them construction land (Umrath 1953). The new construction split between a revolution-inspired *Neues Bauen* style of row tenement construction in left-wing cities and the more conservative cottage constructions in right-wing cities. Though the general mood was an opposition to the overcrowded *Mietskasernen* in Berlin and in spite of a favor of homesteads in the Prussian bureaucracy, most Weimar construction, this time backed by social democrats, was not made for homeownership. Why didn't homeownership ideas gain a hold in the German labor movement?

First of all, they were in too sharp contrast with material reality and resources of most workers. While the overall United States HR slowly declined due to urbanization, ownership rates in American cities systematically exceeded those of comparable German cities. Around 1908 German cities numbered on average 13% homeowners, while American large cities averaged more than 25%.

Homeownership in German cities strongly correlated with higher socio-economic positions, measured as their taxable income, as homeowners were privileged as voters. The only exception to this rule were cities in mining regions were special circumstances had made workers' access to British-like cottages more probable, even though many of them equally remained tenants: mining companies usually disposed of sufficient supplies of land and building material to build colonies for their workers which was in turn necessary due to their rural location; mining families frequently had several members of various generations working for the same employer, thus enabling a certain employment stability and, if not, cottages were supposed to generate these employment ties. In general, the fact that German workers displayed higher HRs between 1950 and 1968 than civil servants can be explained by the stronger urban and therefore homeownership-impeding residence of the latter (Häußermann 1984; Kurz 2000).

In cities like Berlin only 3% of the households owned the housing units they lived in, but even in less extreme cases German cities had systematically lower HRs than American counterparts. In one of the rare studies examining workers' housing during the Empire, even a city of metallurgy and paternalist employers like Duisburg is shown to have a workers' ownership rate of less than 10% (Voigtländer 1982; Niethammer 1976:73). Most workers were highly mobile and renting flats with taking up boarders was a much more flexible way to compensate uncertain employment consequences. Also in the newly founded industrial town of Oberhausen with cheaper land prices, only 22,9% of builders were workers in 1894, many workers sold the constructed houses as they expected wages to be too unstable to make regular mortgage

payments. The 71,2% workers in the city were clearly underrepresented among the builders, while their HR fell markedly below the previous 15% by 1914 (Reif 1993:112).

Major economic differences of that time certainly explain part of the strong variation. As the aforementioned study of the British Board of Trade revealed, Americans had both higher wages, lower costs of living and better housing quality than their European peers (Board-of-Trade 1911). Prior to the study, Werner Sombart had mentioned cheaper United States housing costs as one of the factors impeding the rise of socialism (1906:96ff). At the same time, private horse- and streetcar companies pushed suburbanization and made available sufficient urban land for construction (Warner 1962). Finally, the beginning use of prefabrication methods for the balloon-frame wooden houses, abundant and easily transportable wood as building material as well as the absence of enforced building regulations facilitated (self-)constructions (see Part II).

In Germany, on the contrary, real wages were much lower, already due to the protection premium on many food items (Board-of-Trade 1908b). At the same time, most cities were dominated by an elite bourgeois class of property owners for whom the exploitation of rental housing was economically quite attractive and politically almost the only way to absorb the high number of frequently pauperized migrating poor. As apartment ownership remained legally impossible until 1951, the offered building structure itself channeled workers into a class of renters in German cities. As ownership of workers in industrializing Europe did exist – Belgium and some French cities are good examples (Board-of-Trade 1908a; Board-of-Trade 1909) – the material conditions alone could not have been the sole cause.

A second reason for labor's lacking interest in homeownership lies in the absence of a coalition with farmer groups defending landownership ideas that existed in other countries. In Germany popular movements organized by small farmers were hardly existent in the 19th-century and the organized agrarian capitalism from the German Empire until the end of Weimar was dominated by large estate holders, assembled in the pressure group *Bund deutscher Landwirte* (Puhle 1975:33). Even if many former farmers moving to the cities considered ownership of small parcels the typical form of tenure, these interests of small farmers had never been articulated and organized next to the dominant Prussian pressure group whose protection and credit lobbying was not necessarily detrimental to small farming, but certainly did nothing to promote it. Whenever a division of larger estate into parcels for the laboring tenants was considered, the large estate owners blocked these propositions and even state domains were not privatized in favor of small owners. The only supported policy in this direction – the "inner colonization" of formerly Polish land by German settlers – was rather motivated by aggressive foreign policy goals and came at no cost to established interests in Prussia. When the large-estate holders

coalesced with the large industrialists in the question of tariffs from 1879 onwards, they ceased to be a possible coalition partner for labor.

These causes explain why the land reform idea of spreading land and homeownership did not become associated with organized labor that was much closer to the cooperative and, after WWI, the municipal housing provision solution. The two social groups where land reform ideas actually *did* make inroads in Germany remained equally foreign to labor: municipalities cum bourgeois reformers and a petty bourgeois movement of land reformers led by Adolph Damaschke (Gutzeit 1907).

First, before WWI German academics and reformers in the *entourage* of the *Verein für Socialpolitik* – whose members equally pertained to municipal administrations – engaged in a debate about the land as part of the housing question (Teuteberg 1986; Heisler 1994; Lechner 1972). As both city councils and academia were closed worlds for workers, there was hardly a common ground for them but for some exchanges on municipal socialism. The amount of contributions to the land debate that slowly waned in the 1920s made it a German particularity. The conservative-interventionist as opposed to the liberal faction of the *Verein* discovered the enormous increase of land prices as source of the overcrowded poor tenements and attributed this to the private speculation of land companies nourished by large universal and mortgage banks. Liberals, on the other hand, argued that land prices would just reflect the expected future yields in form of rents and were therefore not a problem per se. Rising land prices, the sign of an unregulated land market, were a concern for the conservative reformers for different reasons: for some it just led to the undesired evil of inhuman tenement housing conditions, for workers and even for a decent middle class living, that had triggered the early debate in the first place (Faucher 1866) and constituted probably the most urgent motive for city administrations to intervene in the land market; for the more conservative wing, partly represented by legal scholars drawing up the German civil code of 1900, making the national ground a private Roman law commodity (von Gierke [1889] 1943), creating fictitious mortgage values by using it as collateral and selling mortgage securities to the "international capital" (Beta 1903; Fritsch 1894)[32] constituted a major break with the Germanic tradition of common land ownership; for liberal thinkers, the local construction and land monopoly distorted the correct market prices that would better correspond to earnings. All of these critics, however, agreed that the high prices of land were something artificial and undesired, though their differing reasons led them to different policy propositions. Measures taken were certainly not homogeneous across cities, ranging from the progressive Frankfurt, Ulm or Freiburg to rather idle cities like Berlin, but

[32] This latter author, also self-claimed inventor of the German garden city, shows clear affinities to the anti-Semitic currents that emerged in the petty bourgeoisie in the 1890s (Stern [1962] 2005).

common measures were: first a local taxation of land surpluses (imposed in 652 local governments in 1910), between 1911 and 1913 an additional federal surplus tax; local government acting as buyer, seller and owner in the land market; the increased use of hereditary leases with the municipality as owner; the use of public transport licenses to create land supply shocks. Thereby many cities restricted the rights, frequently associated with private property, to buy and sell land freely and to draw capital gains from private land. Though they played the land market themselves, they often acted as monopolist, kept town plans secret, withdrew crucial areas from the market and distributed land and construction permits according to administrative concerns.

The second fertile ground on which land reform ideas fell was the *Bund deutscher Bodenreformer (BdB)* (League of land reformers). Most of its members had been attracted by the writings of the American land reformer Henry George whose temporary alliance with the American socialists was one of the instances where land reform and labor ideas coincided. The League was founded in 1888, but only began to grow under the leadership of Adolph Damaschke in 1898 who transformed it into a movement of an estimated 700.000 members with the post-war legislation in favor of small homesteads being both the epitome and the end of its influence. Damaschke, a former school teacher, wrote in a persuasive style against the profit-making with private land at the cost of the majority and attracted especially people from the declining petty bourgeoisie and civil servants, two other groups distinct from workers (Berger-Thimme 1976:27). The league's positive vision of agrarian-like homesteads also did little to find common grounds with the industrial proletariat and rather became object of social democratic mockery (Berger-Thimme 1976:145). In the 1890s its other vociferous proponent Michael Flürscheim participated in public disputes with leading social-democrats like Bebel and Kautsky (Gutzeit 1907:108). The homestead-movement gained some momentum as a measure to respond to the post-war and depression crisis and though practically it also concerned workers, it did not become part of any organized-labor's program. Some of the land reformers, however, were at the origin of the *Bausparkassen* in the 1920s and thus connected the idea of small land and homeownership with a specialized financial institution whose cooperative-structure was mainly attempting to shield its members from capital-market's interest-servitude. Though the idealistic founders soon had to give way to financial professionals and to make compromises guaranteeing the institutions' survival, their ideas had set up a special circuit of housing finance directed to homeownership that was largely a non-worker institution.

To summarize, contrary to the US where pro-homeownership was a stock position of labor and all political parties, with connections to the land reform movement, the German labor

movement did not come to actively adopt this position prior to the 1970s and rather supported tenant protection and the emerging non-profit housing associations. This support is one of the reasons why the latter type of associations but not the homeownership-promoting SLAs came to flourish in Germany.

1.3 Traditional *Handwerk* in the Empire

Next to urban regulation and housing finance housing, a comparative perspective on the housing construction sector reveals long-term differences: the German particularity in this domain is the maintenance of a largely artisanal mode of production of custom-built individual houses with skilled labor, while thus the democratizing effect of Fordist mass production of houses like in the US was stronger limited. In this section, concluding the historical-juncture chapter, the roots of the building *Handwerk*'s (artisans') survival will be traced back to the general accommodation strategy towards the old bourgeoisie during the Empire.

The construction industry in general and more particularly the housing construction industry had the reputation of being the sector that industrialization left behind where industrialization refers to productivity leaps, thanks to more capital-intensive mechanized production with low-skilled labor for markets as contrasted to the custom-designed high-skill individual production on command (cf. Womack/Jones/Ross 1990:13). Already in the 19th-century reformers such as Voigt (1905:13) pointed to the small-scale housing production and management where many economies of scale seemed unexploited . During the German Empire, observers were, in general, pessimistic about the permanent place that craftsmen could have in an industrializing economy (cf. Lenger 2009a:19). Then, during each post-war housing scarcity, usually all political parties expressed the hope to rationalize housing production in order to overcome the enormous housing shortages, implying that conventional house-building was not sufficient (Bernhardt/Vonau 2009).

Indeed, the existing estimates of productivity in the construction industry support this overall reputation. A comparison of the construction industry with 12 other industries between 1850 and 1913 leaves construction at the last position, showing 0,7% annual productivity growth, not even half of other industries' average; there was also hardly an industry using less horsepower than the construction industry (Fischer 1976a:540f). In fact, constructions' craftsmanship basis rather allows for comparisons with other crafts where, in turn, it is known for having one of the fastest growing labor forces and the highest averages of employees per company (Lenger 1988). To be sure, a "creeping industrialization" in form of better tools, the use of mechanized power on the construction site and the transfer of more material production to pre-fabricating companies did take place. Craftsmen in construction, masons in particular, grew faster than the

Empire population and capital-barriers made them dependent employees of the growing local companies; the growing number of masons also indicates the traditional building style based on stone or bricks which replaced wood as building material in the 19th-century (Junghanns 1994). This contrasts with the American development where wooden houses of standardized parts established a different technical culture, with carpenters as dominant building trade. Some German companies counted more than 100 employees working on several construction sites simultaneously. The biggest companies using the highest capital stock and most mechanization in the construction sector, however, concerned civil engineering, big public or private projects rather than the building of relatively standardized tenements (cf. Pohl 1999; Pohl/Siekmann 2000).

The *Handwerk* guilds were a traditional institution of the German home towns that participated in local government and in the self-government of its particular branch, i.e. controlling price and quality, trade, access to business, training, marriage and common insurance funds (Walker 1971:74ff). One of its conditions of success was the lacking political and economic integration of Germany after the Westphalian peace treaty until the 19th-century when Napoleon-inspired liberal commercial codes and the slow economic integration from the *Zollverein* until 1871 disrupted former guild structures. Where foreign trade became installed, however, the producing branches of craftsmen were endangered – this being one of the reasons said to account for the decline of small craftsmanship in England where it was squeezed by industrial companies producing staple goods for the Commonwealth markets; Germany's belated entry into the exporting industrial nations prevented *Handwerk* of a similar sort (Doran 1984:2).

Another reason for *Handwerk*'s persistence in spite of increasingly liberal commercial codes in the 1870s was political: in light of the rising proletariat, the petty bourgeoisie (*Mittelstand*) was discovered as buffer in the capital-labor conflict. The ambiguous notion of *Mittelstand*, increasingly addressed by almost all political parties but social democrats from the 1890s onwards, broadly referred to farmers, shopkeepers and craftsmen who were erroneously thought to be the independent, self-employed backbone of the economy in risk of proletarizing (Blackbourn 1977). Anti-capitalist and possibly even fascist ideas prevailed among them, receptive for competition-limiting, conservatizing policies (Unterstell 1989). Organizations of smaller masters such as the 1882 *Allgemeine Deutsche Handwerkerbund* arose to fight for the re-introduction of former master privileges of setting up firms and of compulsory guild association (Wehler 1995:753). Though the building trades did not pertain to the perishing trades like tailors, conflict potential arose from small master firms being not paid by failing speculative builders and from the bigger construction firms exploiting the lifelong journeymen or de facto workers.

The *former* problem arose because the builders were often endowed with very little capital – large capital entered the building process only in the form of companies speculating with land (*Terraingesellschaften*). These latter, supported by major banks and operating only in the larger cities, bought up vast amounts of city-adjacent land, transformed it into smaller parcels according to city-plans and possible infrastructure requirements in order to sell them individually to future landlords or builders. Much criticized by contemporary land reformers for driving up urban land prices and making outrageous profits, the high amounts of capital involved and the risk of having to keep large tracts of land until sold allowed for high profits only in exceptional years, while others pulled down the average (Bernhardt 1998:46ff); when land overproduction, falling building demand and rents, the secondary mortgage crisis and land reform restrictions set in the 1900s, land companies entered a prolonged crisis, often acting as mortgage bank for possible buyers (Fisch 1989b). When capital-lacking builders went bankrupt, the real estate usually fell back into the ownership of the mortgage holding companies, while smaller masters could not recover their advanced expenses from builders. While land reformers such as Eberstadt and Fuchs made the mortgaging companies and mortgage system in general responsible, economist-reformers suggested to make construction and real estate a larger business (cf. Lechner 1972:707). The situation contrasts with the US where early community builders vertically integrated land, construction and housing marketing business (cf. Part II). German policies, by contrast, saw growing protective legislation for the small masters and *Handwerk* in general: reintroducing masters' privilege to have apprentices in 1908, protecting their claims and returning chambers their public regulation competencies, such as optionally compulsory guilds, in the 1897 crafts code. The politically halted decline of master firms, also reflected in their higher social status, can be considered another comparative difference in the German case (Doran 1984:123).

The *latter* problem – turning into lifelong journeymen – refers to the building trade particularity of showing very early craft-based organizations of skilled journeymen whose re-formed associations in the 1860s constituted the ground on which unions were to grow (Kocka 1986; 1984:101ff). Within the nascent labor movement, building trades made up the strongest group: "Thus, in 1895, 46.699 (18,0%) of the 259.175 members of the independent unions came from the building trades and their organization density of 4,5% was almost twice as high as that in the overall economy (2,4)" (Streeck 1981:99). The majority of the unionized workers prior to WWI had a traditional craft-skill background and were therefore in support of maintaining vocational training institutions (Thelen 2004); this holds even more so for the building trades that grew only gradually into organizing an industry-wide union organization. Vocational training remained largely in the hands of the traditional building trades and artisanal chambers

prior to WWI as no major inventions in (residential) building construction questioned the traditional training. Firms had an interest in employing young apprentices that constituted a cheap source of labor for them. The traditional stronghold of craftsmanship is also shown by the fact that prior to the 1920s, though they covered 43.622 firms and 474.824 with 1997 collective labor agreements by 1914 (Werner 1968:67), unions could not intervene in issues concerning apprentices' wage and working conditions and even then followed the agreement passed between the representatives of journeymen in guilds and their masters (*Innungsverband Deutscher Baugewerksmeister*) (ibid. 159). The extent of protection-from-above measures should not be over-estimated and *Handwerk*'s successful survival has recently also been attributed to the market-adaptive behavior of collectively organizing artisan firms (Hansen 2009).

The historical juncture

By 1914, prior to federal housing policy intervention, the fading German Empire left a legacy of a dense urban structure of tenement buildings, supported by complementary housing finance institutions, constructed by traditionally organized craftsmen, and supplemented by the non-profit associations supported by municipalities, social insurance funds and rising organized labor that remained overtly hostile towards homeownership ideas. Both private tenement and non-profit housing association were predominantly rental. When the first housing laws were passed after 1918, it was these latter housing associations that became the primary addressee of state housing policy which partially preempted the way in which government was to intervene. Much as in the case of the development of the social insurance system where the state relied on the institutional precursors of existing mutual-aid societies in Germany or France (Manow 2009:155)[33], it supported existing housing associations and not municipalities like in the UK or financial institutions such as home mortgage banks like in the US.

With flat ownership a legal impossibility and family-house buildings crowded out by the more profitable tenements, the urban heritage pushed Germany away from the homeownership path. The reader might, of course, wonder if the later national intervention in the housing market was not enough of a path-breaking event to alter the course urban structure had preordained. A short glance at Bremen, the city of the aforementioned northwest with probably most pronounced distinguishing features, shall serve to support the claim that specifically *urban* features even *prior* to national interventions are to be taken into account in the explanation of even today's

[33] The argument that local welfare experiences of associations or municipalities at least foreshadowed or at most preempted national welfare developments can also be found in the development of German and American unemployment insurance systems (Münnich 2010:225) and merits further explorations in other domains.

homeownership levels. The single-family house homeownership-city of continental Bremen is also a powerful example *for* the institutional explanation given here and *against* explanations based on mere geographic and economic factors differing in the US-European context. It shows moreover that the feudal past alone did not determine the course of European cities in the 19th-century and that American-like town-development was not entirely out of question.

Historiography has often singled out Bremen as a special housing case within Germany due to its prevalence of small low-rise town houses, its particularly accessible mortgage market and the relatively standardized construction of rows of owner-occupied housing units (Häußermann/Voigt 1988; Albrecht 1988; Leopold-Rieks 1998). Whereas Berlin's number of inhabitants per building rose from 50 to 76,9 between 1864 and 1900, Bremen's 6,8 in 1875 crawled to only 7,8 in 1900 (Veghte 1999:22). It is true that Bremen's status as a merchant city, industrializing only in the later 19th-century after joining the custom union, was at first not under the same heavy demographic influence as other cities of the time, but: "Whereas the city had needed a half-century to double its 1812 population of 38,836, it required only three decades to double after 1864, and only two after industrialization began in earnest around 1890" (ibid. 22). Three factors in line with the general explanation – town-planning, financial structure, building industry – can be identified to explain why Bremen in spite of this accelerated population growth and contrary to mainstream city-developments in Germany maintained its low-rise housing tradition.

(1) Bremen's surrounding land was as restricted by feudal ties as elsewhere. After abolishing the last feudal restrictions on sale of suburban land in the 1850s, the city could easily incorporate suburban communities, its area growing even faster than its population. At the same time, a land consolidation procedure allowed for easier subdivisions in cases of many property owners. Until the 1870s, both building codes and extension plans were quite liberally allowed for private subdivisions and street-layout, while only prescribing the low-rise housing feature directly or through prescriptions against too wide street designs such as those characterizing Berlin's Hobrecht plan. The 1847 building code prohibited any non-frontage housing, thus making impossible the intensive use of deep lots through the infamous *Hinterhäuser*, leading to a design of many small streets with small front houses (Häußermann/Voigt 1988:263). The conjunction of these town-planning-related features allowed for rapid suburbanization and distinguished Bremen more from other German than from American cities.

(2) Traditionally, Bremen's merchants used to invest parts of their wealth in long-term annually paying mortgage papers, *Handfesten*, in their family members' name to protect them in case of financial failure (Veghte 1999:40). In 1833, these mortgage papers were acknowledged by a

special mortgage law, unique in Prussian-mortgage-law dominated German states. It allowed for purchases without downpayment and, contrary to other mortgage bonds, usually went along with the obligation to pay interests only, not to amortize (Leopold-Rieks 1998:110). Debtors could thus acquire houses without equity, paying interest instead of rent. At the same time, property could be transferred much more easily by transferring the *Handfesten*. Up to the 1870s, even lower-income residents were thus able to become owners, while afterwards most buyers had to rent parts of two- and three-deckers afterwards. Mortgage banks were largely absent in that period. With the Civil code of 1900, the Bremen-specific law was replaced by the general mortgage law de jure, while de facto it co-existed until the 1920s in the new districts.

(3) Beginning in the 1850s, the building trades became liberalized, allowing masters to employ non-urban journeymen and journeymen to build themselves on their own account. In combination with the *Handfesten*-financing, the latter took advantage of the new liberties and built up to 30 houses, entire small streets on a speculative basis (ibid. 127ff). As they largely lacked equity in this enterprise, they were eager to sell directly after construction to individual buyers so that incoming workers hardly had another choice than to become formal owners, with 100% mortgage indebtedness, doubling up and renting out one or two apartments of the building to cover the interest costs (ibid. 200, 217). The high turnover in newly constructed districts, foreclosure rates of about one third of all housing units in the 1870s economic crisis and an ensuing 15-year interruption of building activity are speculative features of the Bremen market, strongly reminiscent of urban real estate bubbles in American towns. Differences in town-planning, housing finance and the building industry in the 19th-century help to account for these intra-German differences – still characterizing the cities today – as much as they help to account for the transatlantic homeownership gap.

2. Paths not taken, legacies and reinforcing mechanisms

The path dependency argument has, to this point, only made plausible why Germany steered towards the nation of tenants in the first place, while leaving unexplained why this path was subsequently followed. The 19th-century has been identified as a critical juncture to which German-American divergence can be traced back because most relevant housing institutions were developed in that era. These critical junctures were not accidental – as strict path dependency theory might claim – but were explainable by different historical circumstances.

Why should developments of over a century ago still cast their causal shadow on today's homeownership rate? Do not multiple regressions with standard demographic-economic variables of intra-national homeownership variation yield R^2's of over 80% and therefore have sufficient explanatory power already? Do not two World Wars and hyperinflation, the destruction of 22% of all housing stock, new city extensions, the integration in the American sphere of influence, the Europeanization and various regime changes give sufficient room for change? In this chapter I will first motivate that the historical perspective has an explanatory value-added; secondly, I will point to the lines of continuity in institutional and physical structure that did not let the German HR rise to American levels.

Already some prima facie evidence points in the direction of once formed housing stock being inert and historically persistent. Foremost there is the durability of the object: German buildings are said to be constructed for a century which implies a yearly replacement rate of just 1% of the entire stock. Though the longevity of individual single-family homes is usually higher, rental dwelling units are usually replaced by other rental units, as the intensity of land use is rarely scaled back. As late as 1993 17% of German housing stock, in spite of area bombing, had its origins in the pre-WWI area – and this percentage is even quite low as compared with other European countries where historical constructions matter even more (Meijer/Itard/Sunikka-Blank 2009). The percentage of housing investment going in renovation is surprisingly high in countries like Germany, Sweden and Switzerland, less so in France (Meijer/Itard/Sunikka-Blank 2009) and certainly not in the United States which is known to replace its housing stock three times faster than Germany, with the US having subsidy bias in favor of "urban renewal" (Listokin 1991:171). Housing's durability can also help to explain why shrinking cities shrink so slowly as house owners have an interest to recuperate their investment value (Glaeser/Gyourko 2005). All this points to changes in housing stock being at least a process of some historical duration. This also holds for HR changes.

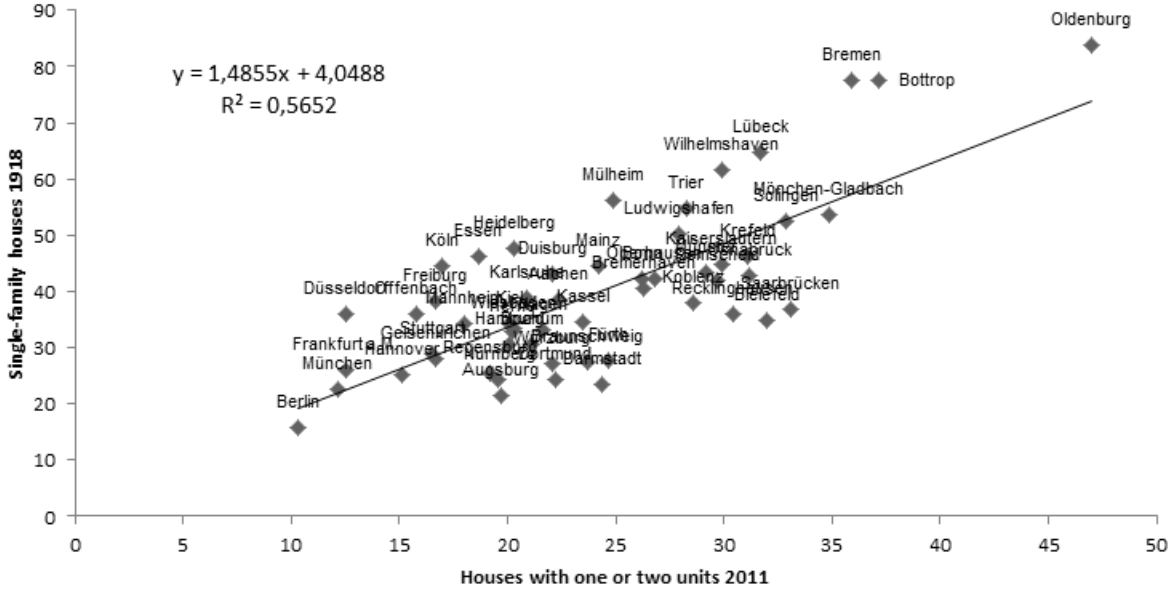
For the HR to rise, the roughly 1% of newly constructed annual units must contain above-average owner-occupied units, conversions of existing rental units into self-owned ones being the other alternative. In times of fastest growing HRs in the 1970s, a one percentage point gain

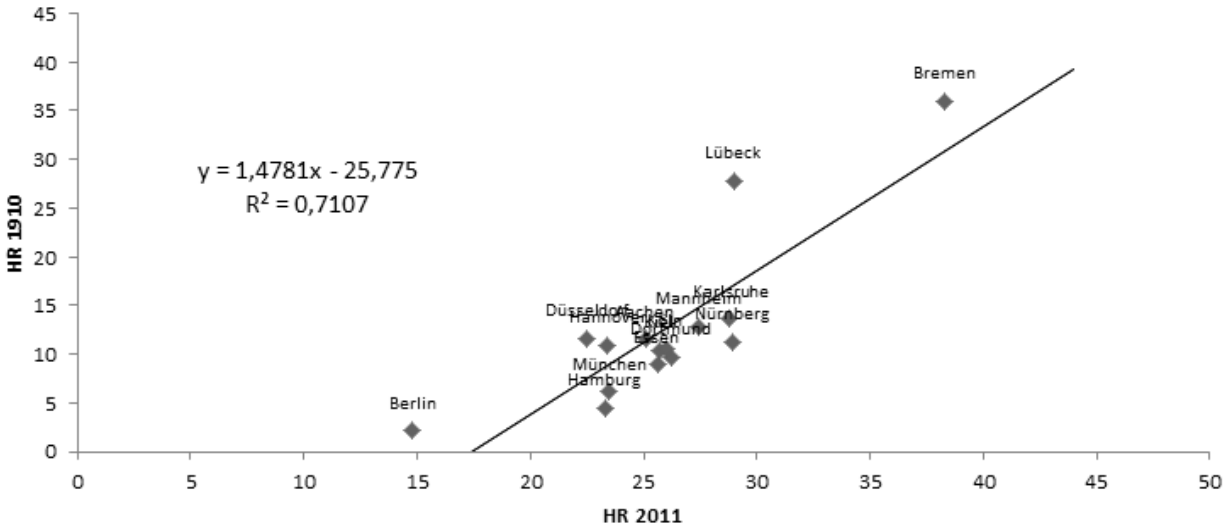
in HR could be gained in Germany every three years; Köster and Metzler calculated for this time period that a yearly percentage point rise would need 50.000 converted rental units and 300.000 new owner-occupied versus 100.000 new rental units with 120.000 demolished units of which 75% are rentals (Köster/Mezler 1979:13). At a time when, as in the extreme year of 1973, 411.173 units were completed in multi-unit dwellings compared to only 156.315 units in single-family homes, with conversions just beginning, these were of course unrealistic calculations demonstrating the difficult reversal of existing structures.

Some further evidence about the persistence of HRs through time comes from regional post-1945 data of German *Bundesländer* whose HRs between 1950 and 2006 correlated strongly (0,88) with the national trend and, on average, equally strongly in the *Länder*-HR covariance matrix, indicating few divergences. It is equally surprising how little the HR level-differences between the *Länder* have changed over time, yielding a relative stable HR ranking.

The most revealing evidence, however, can be observed on the city-level. In 1918 federal statistics surveyed for the first time the urban national housing stock which gives a summary view of the Empire's housing stock, as there was hardly any new construction or devastation in German cities during WWI. At the same time, some cities, for tax and electoral reasons, reported their HRs. A scatter plot of these HRs with the latest German census of 2011 and the correlation of the percentage of the dominance of buildings containing one or two housing unit for 1918 and 2011 both reveal strong lines of continuity and this in spite of the incorporation of more suburbs into the cities between these two dates.

Figure 9: Century-lagged correlation of HRs and single-family house shares





Source: (Petrowsky 1993; Zensus 2011; RWZ 1918)

To make this statement even stronger, a 1918-tenement-house-city variable, the percentage of city-inhabitants living in buildings of more than nine housing units, has been included in a multiple regressions that otherwise uses typical contemporary demographic and economic variables found to be influential in the literature, yielding the following result:

Table 2: OLS-regression on HR 2011 in 56 large German cities

	coefficient	*Std.-err.*	*t-value*	*p-value*	*sign.*
constant	-28,2331	10,7446	-2,6276	0,01139	**
tenement-1918	**-12,2656**	**2,41973**	**-5,0690**	**<0,00001**	*******
Household size	16,5502	5,76909	2,8688	0,00602	***
Building land price	-0,0122411	0,00575499	-2,1270	0,03837	**
Income tax	0,0534324	0,0120423	4,4371	0,00005	***
Car density	0,0313518	0,0145022	2,1619	0,03544	**
R^2 = 0,72					

Data Source: (RWZ 1918; INKAR 2012; Zensus 2011; von Beyme 1987:38ff)

The regression confirms that in explaining today's HR-variation across major German cities broad economic and settlement variables do not suffice. GDP even enters with the usually found negative effect. Other typical demographic, price and income variables are shown to have significant and expected effects, but, most importantly, the Empire housing stock lag variable is found to be most significant and still depresses today's urban HR by more than 12 percentage points while increasing the overall explained variance. The estimated level of WWII-destruction has been included and is shown to be *in*significant, suggesting a continuity of historical structures, contrary to the expectation of the garden-city proponent Hans

Kampffmeyer, Jr., who had hoped that the destruction of 1,5 million rental barracks and further demolition of 2,4 million would have constituted a turning point (Kampffmeyer 1948).

Part of this continuity, as has been shown in individual data studies, has certainly to do with the direct effect of inheritances in terms of building land, money or real estate itself and the transmission of certain housing values from parents to their children (Wagner/Mulder 2000:55; Kurz 2000; Petrowsky 1993). In what follows, however, I will emphasize – as more structural causes – the continuity in urban land, housing finance and construction particularities which have kept Germany on its track, even against the countercurrents that a strong homeownership ideology and policy nourished, presented in the next section.

Excursus: Many reasons why Germany should have more homeowners

Germany's HR has never reached the bottom of a national 10% that England is estimated to have reached in 1910; in 1927's housing count of *urban* areas alone, 20,9% of all dwelling units were in one- or two-family houses which strongly correlate with owner-occupied structures (RWZ 1927). Beginning in the 1920s and strengthening in the 1950s, Germany witnessed both a strong ideological movement in favor of homeownership and housing policies inspired by it and directed against the rental-barrack cities inherited from the Empire. This section mentions the counterforces to the historical legacies which, on the one hand, help to explain why there has still occurred considerable absolute growth of owner-occupied dwellings and why, within the cluster of German-speaking countries, Germany's HR surpasses the one in Switzerland where homeowner-favoring policies remained absent. On the other hand, the section shows that explanations based on the homeownership ideology in politics alone do not suffice for the German case.

Invented by 19th-century reformers, the ideal of a detached single-family house including a garden was far from being absent in both reformers' and political discourses in Germany. Its historical origins reach back to the social Catholic reformer Victor Aimé Huber who drew his inspiration from the British cottages constructed by building societies. As a member of both the *Kongress deutscher Volkswirthe* (KdV) and the *Centralverein für das Wohl der arbeitenden Klassen* his idea to provide state aid to self-help building cooperatives already met Manchesterian opposition against any state involvement. Though failing in practice, Huber, Julius Faucher and others did achieve to establish single family cottage-like houses as the housing model of early reformers. It was to secure a stable family life, promote virtues associated with savings, protect from business cycle downturns, emancipate from the asymmetric rental contract and serve as a form of pension. Faucher can also be considered as an early proponent of the filtering-theory which suggests that middle-class focused housing

subsidies are an indirect (and cheaper) means to help out even the poor who can move in when the middle class occupies their new houses (Zimmermann 1991:50; Fehl 1985).

By the 1870s the home ownership ideal had lost its attraction mainly due to its utopist impracticalities. Instead of making workers' housing cheaper, its construction-costs per family were higher and it consumed more of the scarce building land. Liberal economists in the KdV had also criticized the fact that home ownership would immobilize the workforce, would increase commuting costs and eventually get lost in split inheritances (Zimmermann 1991:43ff). The single family home idea was resurrected in the 1880s when the hygiene movement entered the world of housing ideas in the form of the *Verein für öffentliche Gesundheitspflege*. Early city planners like Joseph Stübben and Rudolph Eberstadt, member of the *Verein für Socialpolitik* (VfS), referred to the Rhenish family house as hygienic alternative to the northwestern (Prussian) tenement blocks – inventions of Koch, Pasteur and Pettenkofer had found out about micro bacteria and epidemic-conducive environments which led to municipal canalization and minimum construction norms. Much of the debates in the heterogeneous VfS from 1890 onwards divided the club into liberal economists in favor of what the market decided (tenement houses) and more state-intervention favoring economists and historians in favor of the family-home (Teuteberg 1986; Lindenlaub 1967). Outside the VfS, the land reform and garden-city movement began to promote the idea of close-to-nature suburbanized housing in family homes. With the first social encyclical letter of Pope Leo in 1891, also the Catholic Church considered the family-home as boon to the family and solution to the social question.

If there was one consensus of the traditional versus the modern *Neues Bauen* architects of the 1920s to 1950s and among housing reformers of all denominations, including Nazi conceptions of housing (Pahl-Weber/Schubert 1988), then it was the opposition against the Empire system of rental barracks where private speculation had gone wrong (Bodenschatz 1988). Traditional architects, the post-war homestead and settlement movement, partly religiously controlled, became the carriers of the homeownership idea until the Nazi regime used the idea in its family policies.

The Third Reich rulers inherited the opposition against the rental barracks, expression of undesired individualistic and chaotic development (Bodenschatz 1988). The Weimar settlements, in turn, were decried and rejected as modernist, communist housing development and the *Neues Bauen* circles were dissolved (Lane 1986:161ff). In the shadow of the monumental architectural city-reconstruction ideas, the positive Nazi *housing* ideal clearly focused on the rural single-family house able to accommodate large families and situated on a large lot of land allowing for agricultural subsistence. Practically, it could take up the homestead and Brüning' unemployment settlement ideas and programs and until 1939 only 8%

of new construction took the form of these self-built frugal settlement units on rural unequipped lots (Führer 2002:147). The obligation to cultivate the surrounding land, the lack of modern amenities and the regular check on the settler's discipline made this suburban experience anything but an ideal form of residence (ibid. 164). In the meantime, most new construction, privately financed through guaranteed mortgages by the state, took the form of luxurious private dwellings or rental units in the centers of armament production or new industrial towns (Harlander 1995:156).

Directly after WWII, the family-home became a short-time ideal of virtually all political parties including the German communist party. With up to five million evacuated people in the countryside, seven million refugees from the east, depopulated cities, roughly 22% of destroyed housing stock and inflation devaluing everything but the often self-constructed shelter, the rural family-home became the projection object of the post-war population (Schulz 1988).

The last repetition of the debate between single-family home versus worker-tenement-house proponents occurred after WWII when the newly formed Christian Democratic Party (CDU) with the minister of construction and "family-home-ideologist" Paul Lücke (Spiegel 1959) pushed for exclusive subsidies in favor of single-family homes to fight East German bolshevism and to "give new roots" for the displaced persons rooted (Wagner 1995:47). Henceforth, the CDU and its Catholic wing around the *Katholischen Siedlungswerk* became the voice in favor of homeownership subsidies. Thus, much like conservative and Catholic circles in other countries, their German counterparts adopted the single-family house as stock position of a conservative welfare program.

Generally, the single-family home ideal found fertile ground in Germany thanks to the wide-spread anti-urban sentiment as revealed in an abundant literature about the vices of big cities and shared by many of the Prussian ruling class (Lees 1985; Bergmann 1970; Hall 2002). Its *locus classicus* is usually seen in the monumental work of the conservative professor and journalist Heinrich Wilhelm Riehl who in the 1840/50s wrote against London and Paris as negative examples for a development the still rural Germany should not take. With the rise of statistics, social Darwinism and movements romanticizing local and regional culture (*Heimatbewegungen*), the debate re-emerged from the 1880s onwards, this time referring directly to the heavily urbanizing German cities. This line of thought has been traced to find its epitome in Spengler's *Decline of the West* and its epigones in the conservative wing of the Nazi movement, Darré and Rosenberg. The social group that carried anti-urban thought in Germany were conservatives and usually members of the status-endangered *Bildungsbürgertum* which even reached out to some members of the heterogeneous Ordoliberals that were to influence the economic order of Western Germany (Rüstow 1957; Manow 2008). This heterogeneous line of

thought abhorred the city for various persistent reasons: first of all, cities were seen as the location of industrialization with its effects to corrupt family life, to increase non-religious life-styles, to increase inequality, to destroy artisan-like manufacturing and take away agricultural labor force. This last feature led to the probably most insistent point anti-urbanists made: the city was said to prey on the country's demographic surpluses, while cities were known to have higher mortality and lower fertility rates, even in spite of the migration of young people to cities. Social Darwinists even sought to establish that cities sucked the most qualified human beings out of the country, slaughtered them in modern industry and thus degenerated the gene pool of those remaining in the country. Another argument focused upon the idea of cultural decline: the uniform-making effect of cities was said to produce uniform thoughts and to prevent the creation of artistic geniuses, to be seen by the fact that most of these beings came from rural areas. Finally, the political effects of industrialized cities were a point of concern for anti-urbanites.

The ideological production of all these homeownership reformers was immense and in no way lagging behind French reformers (Bullock/Read 1985), but did it have any political effects? The general observation is that to the degree that housing policy became more important, homeowner subsidies were established. Prior to WWI the effects were limited to the direct foundation of building cooperatives and saving cooperatives by reform-leaders themselves or through municipalities, through the provision of cheap land, of a first capital basis or a way to collect it. Also the 1889 national social security capital was used to support non-profit housing initiatives. After WWI, when the first Prussian and national housing law was passed, the priority of the subsidies was given to housing units with a two-floor maximum (*à fonds perdu* in 1919 to compensate for high building material prices, then from 1924 in form of cheap credits). This reflected a direct influence of the land reformers, at the summit of their power with veterans demobilizing and settlement cooperatives springing up like mushrooms (Wilhelm 2006). The combination of private capital shortages of the 1920s and the land reform movement also led to the specificity of German home ownership financing, the building cooperatives (*Bausparkassen*) with its three major private representatives founded by land-reform disciples. The internationally high saving rates of Germany, especially after WWII, partially derive from this source (Katona/Strümpel/Zahn 1971:120). This and other economic variables that could have furthered homeownership will not be spelt out further as the puzzle precisely arises *because* resembling countries are compared.

2.1 Urban development as "layering"

The core of the German Empire city showed a surprising stability through time. In the 1920s, there reigned a general consensus against the congested city of rental barracks, but in light of the ongoing housing shortage demolitions due to aesthetic reasons were not thinkable. Most building codes began to include restrictions for building density, prohibiting for instance the notorious Berlin *Hinterhäuser*. At the same time, the conservative aesthetic and nationalist *Heimat* movement, starting in the 1880s, had achieved the inclusion of norms of historic adequacy in building codes and the extension of monument preservation to residential structures (Speitkamp 1999).

Most large cities lost their old towns in the area bombing during WWII: roughly two million bombs were dropped mainly on cities and production facilities during 1941 and 1945 leaving about 20-25% of all housing units destroyed. "The British zone contained the highest percentage of totally destroyed housing units (22% and 35% damaged), followed by the American (14% and 21% damaged) and the French zone (10% and 15% damaged)" (Schulz 1994:34). But contrary to hopes of garden-city inspired planners, the reconstruction showed remarkable patterns of continuity in ownership and building structures. Though some land consolidation and street-layout change took place, leading to more street area and less dense buildings at times, compulsory action against property owners were rare overall and plans reconfiguring the city as suburbanized garden-city were realized virtually nowhere (Rabeler 1997:66f). The economies of scale behind the once constructed urban fabric were among the strongest driving forces in favor of continuity: "First of all, the course of city streets could not simply be changed. Secondly, although the combination of high explose bombs and fire bombs used during the war had razed many buildings to their foundations it was usually less expensive to rebuild the ruins than to build anew" (Schildt 2002:145). Instead of using new materials, 25 of 39 surveyed cities organized local rubble-recycling organizations to use the existing (brick) stones for new construction (von Beyme 1987:106). Reconstructions in the literal sense such as in Freudenstadt were rare phenomena, traditional but assimilative construction was the most widespread form: "Proportionability (*Maßstäblichkeit*), preservation of proportions, small-scale (*Kleinteiligkeit*) and organic construction as well as identical materials, not reconstruction, were guiding values of this model" (ibid. 178). Architects usually took the old eaves height of building as a starting point, often including an additional floor for economic reasons (Hafner 1993:64). Thirdly and most importantly, the almost untouched underground infrastructure determined many of the lines along which cities were reconstructed: "Munich reported damage to its electrical system at 6.58%, its gas system at 15.71%, its water system at 4.21%, its sewer system at 4%, and its telephone lines at 40-50%. In Berlin, about 95% of the underground

capital survived, including the subway system, underground parking, and underground storage facilities" (Diefendorf 1993:19). Thus, the connection of housing to the even more durable settlement, land division and public-works infrastructure acted as strongly preserving material forces.

Besides these economic explanations, historians have put an emphasis on the continuity in the personnel of architects, regional planners and city administrations staff and their respective ideas (Durth [1986] 2001; Leendertz 2008). The traditional idea of an "organic city" remained unchallenged and impeded the dissolution of cities into linear mass-produced single house arrangements, served by private cars, as suggested by the application of Fordist ideas to housing construction (Zucker 1986). Finally and most insistently, private property rights were basically not challenged, only some voluntary consolidation cooperatives could emerge, supporting Mumford's observation that once custom and property rights have formed around developed plots, borders and rights of way, it is difficult to circumvent them ([1961] 1979:352).[34]

The post-war period is not only informative because destroyed cities suggested at least a *tabula-rasa* situation, but also because through the leverage of its occupying forces and then the Marshall funds, Anglo-Saxon influence could have spread some features of its different mode of housing provision into the heartland of Western Germany much as Eastern Germany became a playing field for the standardized Soviet housing and city type, hardly distinguishable from other socialist countries (Buck 2004). Thus, attempts in the British zone to introduce a stronger municipal housing regime and the production of units of only 10-12 years durability collided with all German political parties who were committed to the non-profit association tradition and to avoiding any further provisional units below the usual building standards; only the Hamburg social democrats were shortly in favor of spreading out the city with low-rise buildings (Schulz 1994:101). In the American zone a land reform took place in 1946 that attempted to democratize land ownership by redistributing beyond-100-hectare and *Wehrmacht* properties to refugees and veterans, inspired by the idea that the *Junker* class had been the cornerstone of the undemocratic regime; finally, weak enforcement and obstacles from German *Länder* and farmers' unions made the reform ineffective (Enders 1982). The competition for 15 housing projects to be financed by the Economic Cooperation Administration (ECA) meant an American attempt to establish cheaper building techniques against German *Handwerk* to

[34] In comparable Austrian cities after WWII the historical cores, for instance, were largely in hands of individual private landlords, of which many occupied parts of their buildings built on parcels too small for modern constructions (Kunzmann 1972:147ff). The Swiss planer, suggesting a municipalization of building land, also shows urban evidence of ever smaller parcellizations of various cities (Bernoulli [1946] 1991).

provide more homeownership; German authorities were again against the short durability projected. The resulting units were criticized as monotonous, soon to be occupied by refugees only and did not instill a new building tradition (Logemann 2013:154).

But not only did established property rights limit the change of the existing structure. Also the combination of existing building codes that became gradually enriched by conservatizing criteria (Stommer 1990), and tenant protection impeded some of the reversing mechanisms at work in the US. Tenant protection, especially in times of housing need, made the conversion of inner city housing units into non-residential units increasingly difficult. Though city-building processes have already been noted prior to WWI, data of main commercial streets in major German towns in 1910 still reveal surprisingly many residents even in the core parts of cities (Schott 1912:66). With regard to central-city building – commercial real estate for public, bank or assurance administrations and large department stores – Germany was a late-comer and central cities remained a battlefield between the traditional and declining small bourgeoisie fighting for their "islands of traditionalism" and modern city-planners and the commercial demand for modern central cities (Rodriguez-Lores 1995:324). In the 1890s, when commercial demand of the concentrating economy and the rise of office employees was at its fullest, the preserving traditional city-planning tenets of Camillo Sitte gained ground, offering traditional low-rise cities with curvilinear streets and preservation of old towns as alternative to the Stübben-Baumeister tenets of thoroughfare-dominated tenement-cities (Lees 1979:75). With the incipient tenant protection and housing shortages of WWI, renewed in WWII and 1953, the conversion of residentially into commercially used space was forbidden or restricted, thus maintaining a residential population in central cities (Lichtenberger 2002:78; Von Beyme 1999:91). These conservatizing forces were also behind the missing occurrence of widespread use of commercial skyscrapers in Germany that were at best constructed as isolated 10-15-story buildings in some cities (Meyer 1988). For these reasons, German urban residents were not driven out of central cities into suburban structures to the same extent as in the US, where the preservation of historic residential structures such as in Boston remained the exception and where permissive height restrictions combined with exclusive commercial zones surrounded by blighted areas pushed citizens out in the suburbs.

Whereas Germany was the spearhead of city-planning and extensions prior to WWI, the modernization of old towns remained glaringly absent, the traditional countercurrent backed by the *Mittelstandspolitik* but also the lack of strong expropriation rights against the liberal city bastions in Imperial Germany impeded large-scale city renovations, known from the major French, Belgian and some Italian cities (Breuer 1995; Smets/D'Herde 1985). At the same time, existing urban regulation, the small parceled property in the densest parts of old towns and the

general expectation to relocate concerned tenants impeded, for a long time, the Anglo-Saxon way of large-scale private developments where the land price pressure of almost unrestricted construction replaced the old towns of London or New York (Fehl 1995).

An ultimate attack on the historic city shape came from the 1960s' clearance of old towns and the automobile revolution that planners used to cut larger throughways through the city area (Harlander 1999:257ff). Until the 1960s, American cities were considered an example in terms of slum clearance capacities and automobilization that was behind much of the suburbanization German cities witnessed in the 1960s (Bodenschatz 1987:172). Suburban areas began to increase their overall population share, surpassing 50% in the 1970s (Pfeiffer/Aring 1993:77). Beginning in the 1960s, the American mode of urbanization accompanied by dying central cities, pollution, urban sprawl (*Zersiedelung*) and undemocratic renewal projects came under attack: renewals were often made difficult by resisting property owners, tenants and social movements (Engelke 2011: chap. 4). The 1971 law concerning city construction permitted federal funds to flow into the renewal of cities and 379 cities were subsidized through these channels by 1974 (Harlander 1999:302). Though urban renewal often lowered densities of buildings, it hardly reversed the rental tradition; most expelled tenants, moreover, were relocated into the new suburban settlements dominated by social rental housing units until the mid-1970s, when central-city renovation and preservation gained the upper hand again (Flagge 1999:891).

Finally, the probably most city-corroding phenomenon that had marked the United States ever since the beginning urbanization and with automobile-democratization spread into Europe was the suburbanization in form of single-family homes. Thus, at the times of strongest homeownership increases in Europe, from the 1960s to the 1980s, the phenomenon of strong population increases in the surroundings of cities and even absolute decline of inner-city population was recurrent as much as the starting critique of urban sprawl across countries (cf. Barattucci 2006). The phenomenon is difficult to grasp, but residential density measures still suggest a constant American-German difference:

> "Prior to WWII American cities including their suburbs still had an average density of 3.800 inhabitants per km². In 1990, there were 162 million inhabitants in the urbanized areas or 65% of the population. This amounts to an average urban density of only 850 inhabitants per km². In spite of more wealth and so-called urban sprawl in Germany, average densities have never sunk under 5.000 inhabitants per km² (1990)" (Holzner 1996:117).

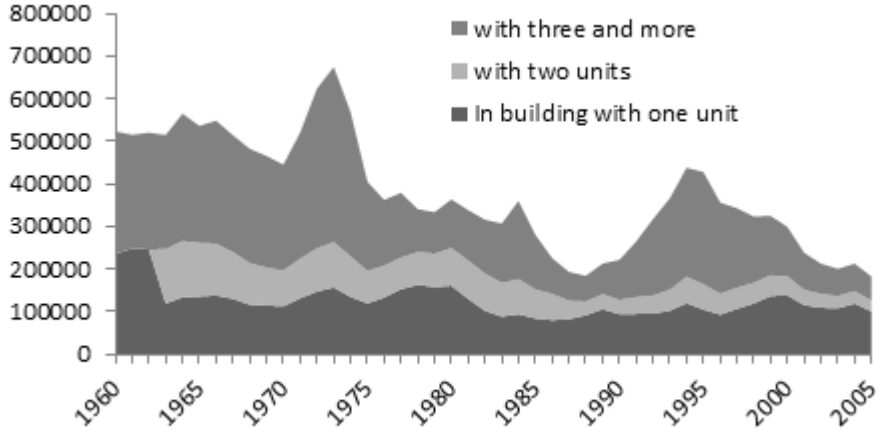
Another approach consists in geodetic surface recordings undertaken between 1990 and 2006 in the Corine Land Cover project, where continuous urban tissue is distinguished from discontinuous one and where the northwestern parts of Europe display the traditionally less dense settlements (Vandermotten et al. 1999:91). Yet another indicator supporting the lower degree of suburbanization is given time use studies that show lower commuting time in

Germany as compared to both the US and France (Converse 1972:166). In a 1970s' sample of several cities in the respective countries, for instance, 31,2% of German male employees remained below 39 minutes commuting time as compared to 6,6% and 18,8% of their American and French counterparts (Szalai 1972:820).

When it comes to explaining these differences, the sprawl-inhibiting role of municipal land policy seems to be among the primary factors, making German building land prices among the highest in Europe (Dransfeld/Voss 1993). Governmental building land reports have repeatedly mentioned land price increases as biggest impediment for more homeownership settlements (Baulandbericht 1983; 1993); the strong correlation of homeownership with land prices and settlement density is further indicative of this. Municipal representatives have repeatedly shown to be skeptical towards larger single-family home settlements as they fear the infrastructural costs that this implies (Gewos 1975).

The Empire city has for all these reasons shown a remarkable persistency through time which should not belittle changes in details and outer appearances. The way reformers addressed and realized housing policies rather concerned different ways to deal with projected city extensions and forms of suburbanization. The suburbanization can be considered as one of the most literal processes of institutional change through layering (Streeck/Thelen 2005b), i.e. the gradual replacement of one institutionalized form of urban living, namely dense rental structures, by the addition of a competing second tier, suburbanized owned homes. A simple answer to the question of why Germany's HR did not rise to American levels can therefore refer to the new construction numbers adding layers to existing cities. For both the interwar and the postwar years until the 1970s, the yearly production of multi-unit dwellings exceeded, at times by far, the new one- or two-unit dwelling additions to the stock.

Figure 10: New residential construction by number of units in structure



Source: (Sensch 2010a), in housing units built

In the interwar period, especially through the homestead movement, the percentage of single-family homes of all *buildings* in the urban Republic increased from 29,2 to 32,2%, whereas the percentage of buildings containing 11 and more units dropped from 5,3 to 4,8% of all buildings (RWZ 1927:37), indicating the general tendency to avoid the further construction of rental barracks. For the post-WWI period, more precise numbers are available showing a general dominance of multi-unit dwellings until the 1970s after which they began to depend on the building cycle: in periods of high demand such as in the post-unification boom the former dominance reappears, otherwise it falls below the 50%-level.

2.2 Housing finance continuity

The often radically changing economic and institutional conditions from WWI onwards did certainly not leave the multi-tiered housing finance system of the Empire wholly untouched. Strong government borrowing during the wars and ensuing hyperinflations led twice to the breakdown of the capital market, the destruction of up to 90% of monetary wealth and heavy state interventions in all capital market affairs including housing finance. But nonetheless, one can trace the further establishment of the non-profit tier financed by social insurance funds – at times heavily seconded by state credit –, the private rental privileging mortgage institutions and the deposit-based homeownership favorable banking, now supplemented by the belated entry of the housing-finance specializing *Bausparkassen*.

After WWI and until 1930, there was a boom, then consolidation in new cooperative establishments for several reasons. First, land reformers had successfully tied their cause to the homestead movement, promoting the founding of suburban settlement societies for veterans, and had finally brought authorities to distribute direct housing subsidies to preferentially lower-

rise building constructions. After the war-destruction of capital and the ensuing hyperinflation, settlement societies and cooperatives were a convenient way to get capital through public channels. Secondly, with the private construction industry hampered and in the general atmosphere of socialization of the economy, many unions and professional groups of different denominations founded cooperatives funded by and building for their members, receiving building capital from their respective professional social insurances. Thirdly, especially union associated cooperatives and building construction trades became the main addressee for the public housing subsidies reaching its peak between 1924 and 1931. Some had also founded construction cooperatives, *Bauhütten*, that were equally included in the social housing circuit especially through its consolidator and Berlin town-planner Martin Wagner. Finally, Brüning's 1931 program of resettling the unemployed on agrarian homesteads, continued by the agro-romantic Nazi wing, obliged mostly homestead cooperatives to help build modest rural housing units thought for subsistence economy. At the end of 1940, when the war slowly extinguished any new civil construction, all cooperatives had built 1,329 million housing units of which they still managed 1,25 million as their housing stock, about 200.000 units had been sold to homeowners.

Within the cooperative movement, there was a wide heterogeneity of ideological orientation which had also consequences for the question of member homeownership. Whereas the cooperatives and the homestead societies were usually smaller member-based organizations directed at bringing their members into homeownership – often supported by agro-romantic conservatives –, the limited dividend societies and union-based cooperatives were rather focused on providing hygienic housing units per se, often in social rentals. In corporation with constructing municipalities like Frankfurt and Berlin, those organizations constructed and managed predominantly rented units, usually in form of higher-rise buildings for elite workers and middle classes, because rents were tied to the sometimes high construction costs. These differences are reflected in their relative contribution to the construction of single-family homes of all units that range, among subsidized creditors in 1936, from 100% and 56% amongst individual settlers and homesteads to 24% and 12% in the case of settlement societies and cooperatives (Kämper 1938:170), whereas the larger size of the latter reduced individual home construction to a minor share in this year. A 1939 statistic of the non-profit housing stock constructed and held by cooperatives (eGmbH), limited dividends (GmbH and AG), homesteads and others shows an overall predominance of (rented) high-rise housing units and this in spite of the post-depression building cycle and Nazi promoted settlement movement.

Table 3: Housing stock of non-profit housing associations by type of association and building

	Settlements and *Volkswohnungen* low rise housing units	high-rise housing units	% high-rise of all construction
eGmbH	223468	327146	0,58
GmbH	206345	190432	0,46
AG	54710	129279	0,70
Others	11166	18306	0,61
Homesteads	53233	14833	0,20
Treuhandstellen	2446	40	0,01
Gagfah	23695	29711	0,56
Sum	575063	709747	0,55

Source: (Lütge 1949:269, own calculations)

The 1920s also meant a change in municipal electoral rules. All remnants of a property census were abolished and social democrats usually won majorities in the important cities. At the same time, the *Burgfrieden* during the war and governmental responsibilities in Weimar had set the national SPD on a moderate course which, in housing policy, meant state support for the non-profit associations and for tenant protection. In that social democrats differed from municipalization strategies as practiced in Vienna (Czeike 1958) – though municipal involvement in local non-profit associations grew close to it – but also from more radical expropriation strategies as practiced in revolutionary Russia and proposed by the radical socialists in revolutionary Germany. At the same time it differed from left-wing positions with more rural affinity or in Anglo-Saxon countries where homeownership was already one of the objectives found. Social democrats became an important ally for the non-profit movement on whose constituencies they themselves could count: "The social democrats had made the non-profit associations their preferred partner and voted unreservedly for subsidizing them from the Heidelberg manifesto of 1925 onwards. Thus, the housing tax era had created strong organizational, financial and personal ties between numerous city administrations, the social democratic party, the independent unions and the newly founded housing associations" (Schulz 1994: 105). Though the elimination of opposition during the 1930s dissolved many of the formerly grown ties between unions, social democrats and the housing associations, the consolidation to bigger units even furthered the growth of the formerly Hamburg housing association *Neue Heimat* that emerged as the biggest of all housing companies in the 1950s (Kramper 2008). Between 1951 and 1972, i.e. the boom years of post-war constructions, the

non-profit housing associations oscillated between 15 and 35% of all new construction, while 80% of their constructed units were in multi-family rental housing (Dorhöfer 1978). The close link between the SPD and these developers can be seen by the fact that over 90% of the 95 newly constructed large housing estates, containing more than 2.500 units each, were initiated and passed in SPD-dominated city councils, usually with absolute majority (Schöller 2005:189). At the same time, the ideological heterogeneity of the non-profit movement guaranteed the support of conservative forces as well. Conservative mayors like Adenauer in Cologne actively cooperated with non-profit associations when solving municipal housing problems, while the post-WWII preference of the CDU was in favor of a dominance of homeownership, resulting in a partisan cleavage line, noticeable in the changing extent to which *Länder* governments turned to rental or homeownership construction (Jaedicke/Wollmann 1983). Thus, party influence did not only play a role on the municipal level via a preference of SPD-municipalities for the larger rental housing estates, but also through the *Länder* housing subsidy structures. This contrasts with the US, where Democrats have a strong preference for homeownership policies, while their support for public housing has not created an equally strong alternative housing circuit that could have significantly lowered state-HRs. The different interests of *Länder*-governments also partly explain why the strong homeownership focus on the national level from 1953 onwards did not directly translate in more homeownership construction in the *Länder*. "Through implementation regulations, the *Länder* could pursue their own housing-policy goals. Social democratic Hesse passed laws providing half of all public funds for the non-profit associations. […] Similar laws were passed in Schleswig-Holstein. North Rhine-Westphalia required higher downpayments for the construction of small housing units from individuals than from non-profit associations" (Schulz 1994:277). To the extent that the *Länder* part of the object subsidies grew to over 50% in the 1960s, growing to a temporary 100% in the 1980s, this influence became more important (von Beyme 1987:108).

Another mechanism that reinforced the social (rental) housing part of the stock was the obligation of non-profit associations to use their funds for housing investments, inscribed in the 1940 law on the non-profit associations. Though being limited to 4% dividend on their share, all money gained had to be reinvested in new construction. As market-capital was difficult to receive especially in the 1950s, mortgaging the existing stock was one of the means through which non-profit companies could finance new construction with new construction enabling again new mortgaging and an ever growing stock. As rents in the existing social stock were tied to a maximum of cost-levels, non-profit companies such as the huge *Neue Heimat* could compensate for higher land, building or capital costs only through new construction, leading to a dynamic of its own (Kramper 2008).

The homeownership circuit

Parallel to the growing non-profit housing circuit, the *Sparkassen* jointly with the growing *Bausparkassen* came to establish a circuit primarily directed to homeownership finance. Both private and public *Bausparkassen* had to overcome initial image problems in the 1930s when most private *Bausparkassen* were still not specializing on the secondary mortgages only. Due to new saving contributions breaking away, they had to queue new mortgagors until further deposits were available; as this contradicted with their publicity of faster mortgages, they still had to fight against an image of financial swindling (Lehmann 1983). Their eventual restriction to the secondary mortgage realm – seconding the first *Sparkassen* mortgages in the case of public *Bausparkassen*, and private or cooperative mortgages in the case of private ones – extended overall LTV-ratios to averages of over 70% which constitutes one of the reasons Germany did not develop a mortgage insurance system as it was simultaneously introduced in the US.

There are several functional alternatives of how to deal with the possibility of mortgage default risks, especially concerning the upper percentage domains of property values to be mortgaged. The one alternative realized in Germany is the prescription of conservative lending practices – both a low LTV-ratio and conservative estimates of housing values that does not take possibly speculative current market values for granted. Ever since the Prussian *Landschaften*, the state authorities prescribed relatively conservative lending standards to the different mortgage-giving institutions, whereas in accounting Germany is known to rely mostly on book- and not actualized market values, resulting in more conservative estimates (Radebaugh/Gray/Black 2006:67ff). The *Bausparkassen* were a late response to the broken-down private market for secondary mortgages that prior to WWI had become too risky: their risk reducing particularity is the member-based cooperative institution with contract-saving obligation where possible mortgage default risks are shared by the cooperative. Whereas this alternative of a divided mortgage market and conservative lending developed in Germany, largely explicable by the sequence in which mortgage-lending institutions emerged, the US established an alternative way of securing mortgage risks: public (and private) insurances against mortgage default and state guarantees to allow more liberal lending practices. These two alternatives have been surprisingly absent in Germany (Kämper 1938). State guarantees for the extension of mortgage volume or the reduction of interest paid has been a traditional instrument used mainly by municipalities ever since the Empire to subsidize non-profit associations, but as governmental lending largely addressed non-individual borrowers, an American-like state guarantee for individual mortgage defaults did not become established. Only during the 1930s did the state use guarantees for private (rental) housing mortgages as capital subsidies would have impeded

the armament (Harlander 1995:51). Private insurances of mortgage default first arose in the 1900s but never developed as a separate insurance sector in Germany (Kofner 2006), partly even due to a lacking critical mass of individual homeowner borrowers of higher risk (Blumenthal 1932:104).

Bausparkassen savers became the addressee of government subsidies in the course of the general attempt to mobilize more private capital in the 1950s by inciting savings earmarked for housing construction through bonuses and income deductions on savings. The 1952 *Wohnungsbauprämienrecht* initially provided saving bonuses for all kinds of savings related to housing investments, but it was as if tailored for the housing finance institutions (Pergande/Pergande 1973:183). The *Bausparkassen* then participated disproportionally in the general retail revolution of the post-war period (Frazer/Vittas 1982) – the democratization of saving and checking accounts, wage pay on checking accounts. In the government pursuit to let workers participate in the overall wealth formation, the *Bausparkassen* savings became again addressee of further subsidies for certain income classes whose employers were incited to contribute to building up workers' wealth formation directed to homeownership (Kohlhase 2011:41). In 1969 lower-income groups received additional bonuses, while 1974 saw the first of successive reductions of state subsidies (ibid. 127f).

By 1980, 75% of all purchasers used *Bausparkassen* means to purchase their home for which 50% saved 4 to 9 years, averaging equity rates of 42,3% (Weissbarth/Hundt 1983). Still in 2010, they still held about 10% of all housing mortgages which, as the volume of secondary mortgages is smaller, affects a broad number of purchaser (Kohlhase 2011:2). Calculated Pearson's correlation coefficients of per-capita *Bauspar*-deposits and -mortgage volumes, on the one hand, and the *Länder*-HRs in 1993 and 2000, on the other, results in above 0,6 values. This gives further evidence of the homeownership-favorable consequences of this particular housing finance institution. There is no legal savings compulsion but strong incitation to contribute regularly during the savings phase because otherwise contracts are allowed to become terminable or waiting time for the mortgage attribution becomes longer (ibid. 27). Although *Bausparkassen* also became accessible for pure savers, the default case still is the saving and borrowing member which distinguishes them from the American SLAs which, in that respect, became similar to any other bank. The combination of the traditional conservative lending for first mortgages and the *Bausparkassen* institution that requires a prior savings phase leads to later average years of households' first housing purchase in Germany as compared to almost all other countries. At the same time, households have on average much higher equity-ratios in their housing finance which is why *Bausparkassen* have also been used to account for the higher German rate of aggregate savings (Börsch-Supan/Stahl 1991).

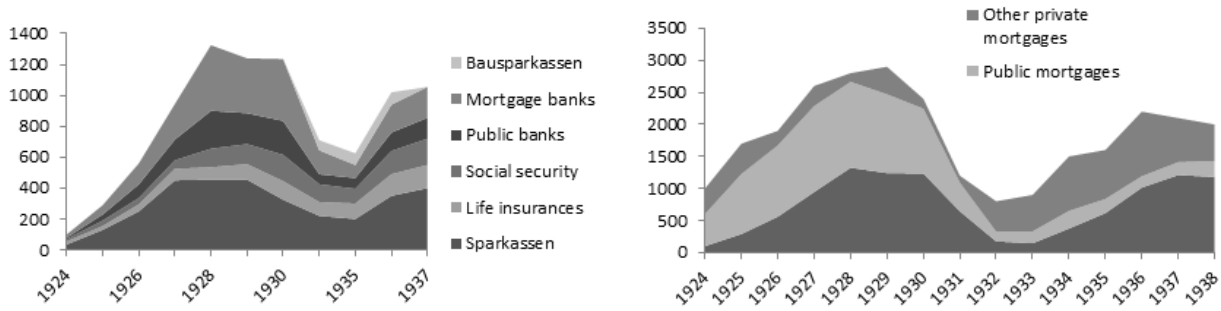
Bausparkassen were only the complementary secondary, but mostly necessary mortgage institutions adding to the deposit-based banks which grew into primary-mortgage lenders in the second half of the 20th-century. *Sparkassen*, credit cooperatives and from the 1970s onwards especially commercial banks grew to major new actors in a growing market for local deposits and primary mortgages (Pauluhn 1993; Winterstein 1993), cooperating with the *Bausparkassen* to offer a complete financial product "under one roof" (Ball 1990): this growing competition as a result of the "retail revolution" led to a gradual erosion of the historic link between certain banking and building types (ibid. 162ff).

The private rental sector and mortgage banks

Finally, private rental housing and mortgage banks, the third housing circuit next to social housing and homeownership, witnessed a decline as compared to their heydays during the Empire but remained important pillars of the German housing system. Mortgage banks persistently accounted for an average of 16% capital used for housing finance between 1960 and 1999, heavily involved in social rental housing finance after the war (Sensch 2010b). At the same time, with the integration of most specialized mortgage banks into large universal banking structures in the 1970s, their bias in favor of rental housing finance was lost and today residential mortgages are lent in equal shares for owner-occupied and rental housing construction (VdP 2013).

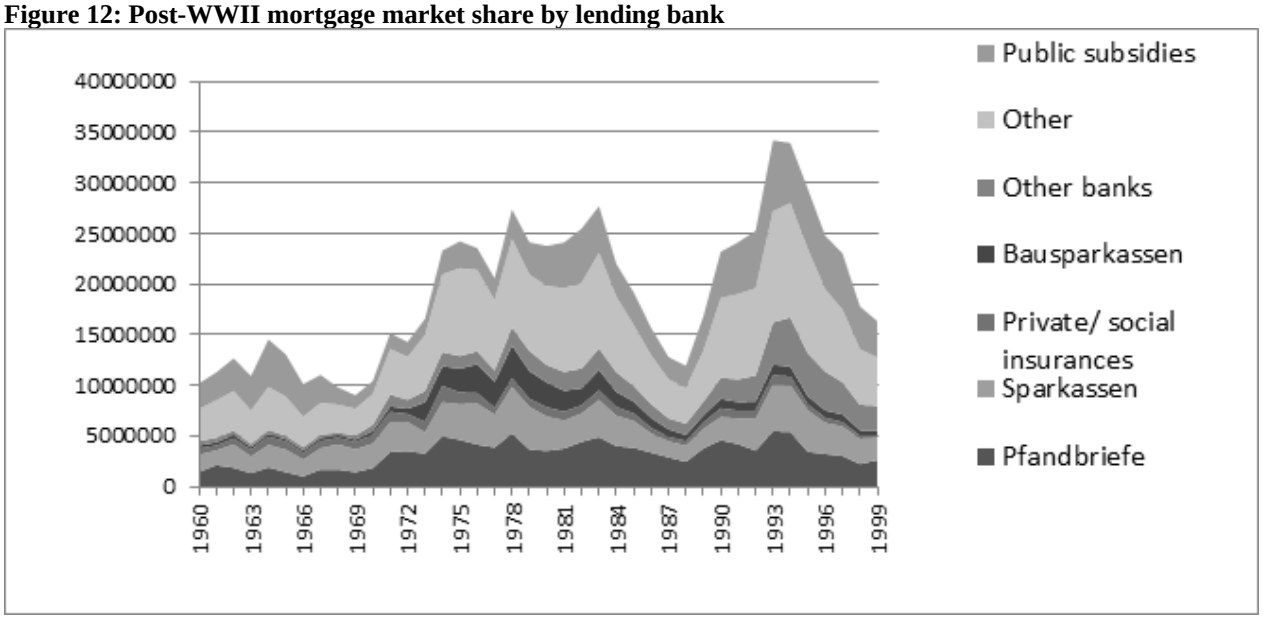
Especially during the short return to economic prosperity in the years from 1924 to 1928, the housing finance composition came to resemble the Empire times again, excepting the new public fund circuit that supplemented social insurance funding of non-profit associations in a way (see graphs below). A variety of reasons impacted negatively on the formerly flourishing construction of urban rental buildings financed by mortgage banks: the rapid phase of Germany's urbanization had been over; the high post-war inflations was used by many debtors to repay their mortgage debts leaving the investors of *Pfandbriefe* dissatisfied; the remaining debt was further devalued by the currency reforms in which nonetheless mortgage bonds were still privileged; landlords' debt was reduced to 25% of its pre-inflation value and, in return, had to pay the new housing tax while enduring rent control measures; between 1914 and 1960 much of the existing rental housing stock was concerned by rent-price and eviction-restricting regulations as well as more direct interventions in landlords' economic freedom such as decreed exchanges of housing units or compulsory accommodation of foreign tenants in vacant rooms in already occupied housing units (Führer 1995b).

Figure 11: Interwar mortgage market share by source of financer



Source: (Kämper 1938:161; Blumenroth 1975: via Gesis); in billion *Reichsmark*

Figure 12: Post-WWII mortgage market share by lending bank



Source: (Sensch 2010c), in 1000 DM

These war- and post-war interventions must be viewed in the light of a general pacification and then "consumer socialism" (Führer 1995a:329) strategies that governments pursued in democracies with a dominance of urban tenants among their voters. The well-functioning post-1960 German rental market has been put forward to explain Germany's low HR today (Voigtländer 2009). The post-1960 end of strict rent price regulations and simultaneous maintenance of tenant protection rights indeed distinguishes Germany from countries with higher HRs where private rents remained strongly regulated or tenant protection was discontinued. This explanation, however, still begs the question of why governments choose to ease rent price restrictions when restricting rent prices serves as a budget-neutral social policy for a majority of voters while in the short run damaging only a small group of landlords (1). It further begs the question of why alternative paths followed by high-homeownership countries have taken, namely: why did tenants themselves not opt out of the unregulated housing stock and why did no massive conversions in owned housing units take place (2)?

The short answer to these questions is that exit options out of the existing rental multi-story stock were too narrow so that a historically growing and permanently adapting tenant-landlord compromise has left both landlords and tenants satisfied with the status quo, while conservative parties accommodated the interests of small landlords as part of a *Mittelstandspolitik* and of a broader construction support. This contrasts with the situation in the UK, the US and, partially France, where leased cottages were easier to sell out to former tenants and where conservative parties rather opted for supporting homeownership than landlords.

(1) The two crucial objects of potential conflict in the landlord-tenant relation are rent prices and their increases and the time period a tenant is allowed to occupy a housing unit. Prior to WWI in most countries, landlords had almost no legal limitations as to terminating leases and as to fixing rent prices.[35] Landlords were well organized in local landlord associations – reaching a 60% organization density in Berlin already by 1860, for instance (Lehnert 1994:34) –, dominated most city councils and even had a national federation prior to WWI, whereas the early organized German tenant movement, revealingly, was composed of bourgeois, often of the same social status as their landlords, who rather sought harmonious than conflictual relations; having the stairways electrically illuminated, for instance, was among their claims (Führer 2000:7). At the same time, tenant dissatisfaction with rent prices or evictions was occasionally voiced in local riots (Geist/Kürvers 1984:115), but frequency and extent does not seem to have lived up to French conditions where anarchist groups actively supported clandestine moving or intimidation of landlords (Jolis 2009).

When war-price inflation set in and soldier-families risked to have payment problems, all war-affected countries reacted by insuring tenants against evictions and making rent payments easier. Compared to the French legislation, Germany's reaction protected less tenants in 1914, extended tenant protection to all tenants only by 1917 and the reduction of unduly high rent payments had to be negotiated in municipally organized, co-determined housing office that could built on the pre-war organization of local housing inspection and housing exchange offices. By contrast, in France, all tenants were given protection while payments of rents and of landlords' mortgage interests were deferred (Führer 1999). After the war, Germany pertained to the group of countries with high inflations that eroded both rent levels and mortgage debts and with some strong interventions in landlords' rights, such as compulsory accommodation, etc. (ILO 1924:33, 40). Laws in favor of protection against dismissals and rent price capping

[35] In Germany, general usury laws provided certain price ceiling to rent prices as well in the 19th-century, but were rarely applied; the German Civil Code of 1900 already provided protective norms against evictions that could however be contracted away and practiced in the standard leases set up by landlords' associations (cf. Hügemann 1998).

followed the war everywhere – with Germany's 1922 rent act and 1923 tenant protection act (Hügemann 1998) –, while differences existed between those countries attempting to return to profitable rent levels – realized to a certain extent through measures of "creeping decontrol" of rents such as in Germany until Hitler's general price stop of 1936 – and those countries such as France where by WWII still the majority of urban rents was rent regulated and had fallen to 2% of workers expenses in Paris by 1948 (Mario 1976:208).

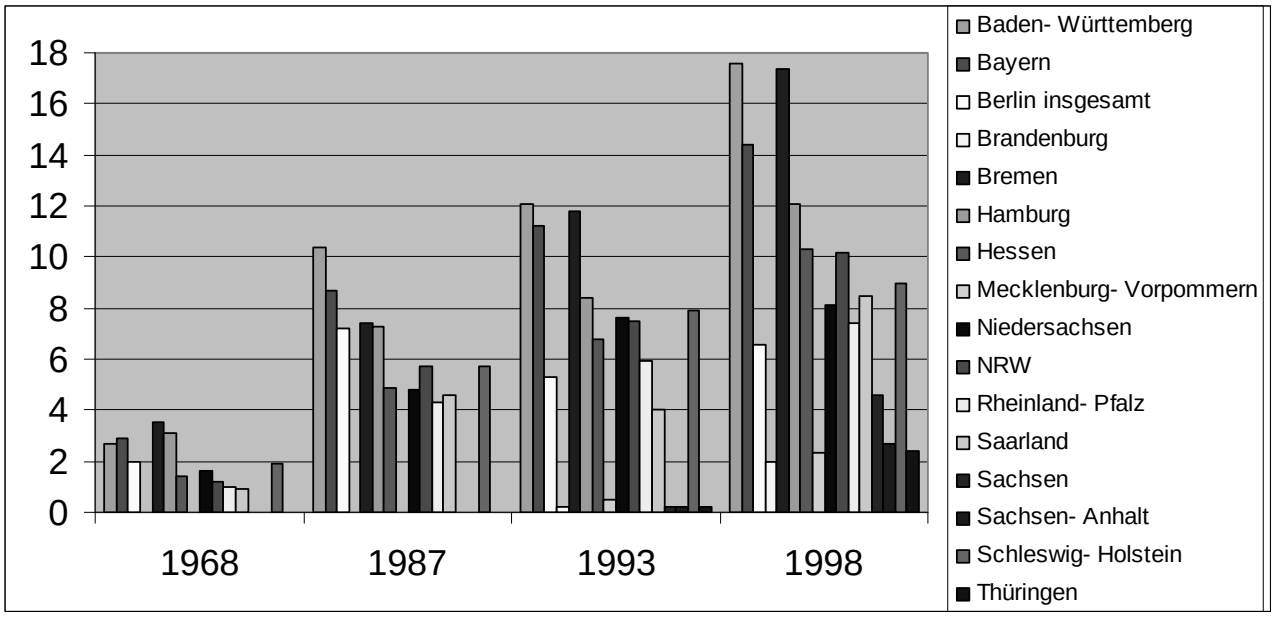
Though the interwar years were no economic heyday for German landlords in spite of losing their mortgages, they were even less so in other countries such as France (Führer 1999). This applies even stronger for the period after 1960, when German cities briefly returned to almost 19th-century freedom for landlords until the 1970s' laws settled on rents increases limited by local comparative rents and maximum increase caps and permissible dismissals in cases of landlords' own need or tenant misbehavior only (Brenner/Franklin 1977). The tendency to decree national rent price stops, as witnessed in countries with higher inflation rates such as France, has been unknown in Germany and the return to free market rents was the earliest in Europe, accompanied by tenant subsidies which continuously grew to cover around 3,4 million households in 1991 (Voldman 2013:146; BRBS 1998). Compared to the US, where rent legislation failed to become nationally regulated (Malpezzi 2011:86), on the other hand, German tenants have been better protected from arbitrary evictions and excessive rent increases. This intermediary position is also reflected in Malpezzi's international rent control index of about 1990 in which countries tend to fall either into highly regulated or highly unregulated regimes, while Germany rather ranks in between (Malpezzi/Ball 1993).

Why have governments not succumbed to rent price stops as cheap social policy for a majority of voters in Germany? One reason lies in the measures of local welfare that were possible in the stronger German municipalities, allowing for housing allowances before this national policy in favor of tenants was first introduced in 1965. The late introduction of rent control during the war and the high municipal relief expenditures in the Depression are indicative in this regard. The dense organization of landlords, counting 1.200 local associations including 350.000 members in 1921 and weathering times of threating socialization after WWI (Eyermann 2006), can be considered another reason; in Weimar they co-founded the German *Wirtschaftspartei* for which the association's president Victor Bredt successfully running for the Prussian diet, only to become secretary of justice in 1930 (Schumacher 1974:833). After WWII, the landlords were well represented by both the CDU and the FDP whose respective secretaries of reconstruction frequented the association or even have held offices in it (Schulz 1994:204ff; Spiegel 1958). Finally, much like in case of the old artisan *Mittelstand* with whom landlordism often coincided, support of landlords was also considered as a strategy to accommodate

proletarianization-endangered classes; after WWII, the typically small landlord was also vaunted by conservatives as bulwark of individual property against the growing housing stock ownership of the non-profit corporation. Sociologically and statistically, these private landlords are among the more obscure social groups, but most studies throughout the century reveal a strong fragmentation of rental property ownership into many owners of not more than three rental properties and high proportions of artisans, shopkeepers, retail and catering trades (for 1900: Neumeier 1995:316; ZDHG 1936:10; Guerra 1992:30). Today, an estimated 61% of rental units is still held in this type of possession, while private companies hold 17% and non-profit associations the remainder (Westerheide 2011:45). While this degree fragmentation has marked private rental housing almost throughout different western countries (Scanlon 2011:22f), the accommodation strategy has historically been much stronger than in Great Britain (Daunton 1983) or in France (Michel 2002), where private landlords have historically been less advantaged.

(2) The attractions of moderate rents and sufficient protection against evictions can be considered among the reasons why tenants themselves did not choose to abandon living in rentals. Protective legislation can also be considered among the causes why condominium conversions did not become a mass phenomenon. Separate apartment-ownership was not only re-introduced belatedly, but also was its subsequent cultural adoption in the FDR rather modest, similar to Switzerland (Werczberger 1997):

Figure 13: Percentage of apartment-ownership of all housing units in German Länder



Data: Destatis, own calculations

The data suggest a general increase in ownership especially in the city-states Bremen and Hamburg and the southern German states. The rate of self-owned apartments among the apartments in separate ownership has been slightly above the general HR indicating that it increases only certain regional rates within Germany. The high number of tenants in separately owned apartments is certainly a different form of tenure than the one reported for southern Europe and rather reflects a spread of landlordism than a spread of homeownership. The relatively high percentage of rented apartments shows the effect of a housing policy that is rather orientated towards wealth formation than the spread of certain forms of tenure (GdW 1992:24).

In many countries, including Germany and the US, the 1970s witnessed a beginning conversion of formerly rented into owner-occupied dwellings, either through the sale of units from the social or private rental stock to sitting tenants or through new occupiers. These conversion processes evidently have a considerable impact on the housing stock composition as each converted unit is lost to the rental market and simultaneously increases the self-owned stock. Conversions occurred because single-family home prices, building costs and interest rates had reached a post-war peak while a new generation of young professionals constituted a demand for older inner-city convertible rental housing stock with conversions being more profitable to investors than rentals. Moreover, a legislative change in 1977 allowed income tax deduction of housing purchases for the first time for *used* housing units also. In Germany, the conversions are not statistically surveyed beyond the local level, but in the boom-year of 1980 100.000 conversions of free rentals and 50.000 social rentals were estimated (Thomas 1992:102). The overall number of conversions, however, has been limited by some features of the tenant protection legislation that extend the dismissal period to a minimum of three years that can grow to even 12 years if the building has been financed by public funds (Thomas 1992:187).

To summarize, throughout much of the 20th-century, the circuit of mortgage banks and private rental construction, complemented and replaced by the SPD-supported social housing circuit in times of housing (capital) crises of the 1920s and 1950s, has worked in favor of continuous additions of rental units to the German housing stock, in spite of the belated rise of a specialized homeownership-finance circuit in form of deposit-banks and *Bausparkassen*. Though the traditional link to certain types of buildings and tenure slowly eroded with the end of autonomous specialized banking institutions from the mid-1970s onwards, this does not imply an end of rental housing construction. Moreover, the existing rental stock has proved to be difficult to circumvent as vested interests of both landlords and tenants have grown around it, impeding large-scale conversions known from other countries.

2.3 Rental construction industry vs. trade-based individual homes

The puzzle about the homeownership gap would probably disappear, if one were to use not the *number* of owner-occupied units as indicator but the *value* of these units. The few hints and coarse calculations concerning the value-indicator suggest the following picture: German newly constructed houses have been much more expensive in relation to income whenever spot-comparisons were made in history (Stahl/Struyk 1985; Ball/Harloe/Martens 1988:118; Mehnert 1982:5). Surveys about the average value of existing owner-occupied housing also points to high German house prices (Kolb/Skopek/Blossfeld 2013; ECB 2013) and the aggregate German housing wealth in relation to GDP even yields a higher value than the American one (Pfeiffer/Braun 2006:3; De Bonis/Fano/Sbano 2013). Macro-economically, Germans channel an equal percentage of housing investment into owner-occupied housing, but higher housing prices seem to permit less people to do so every year. In other words, housing wealth has not witnessed a division in smaller shares which would have further democratized access to homeownership as had been the case for stock ownership. This revised view, however, does not dissolve the initial homeownership-gap puzzle, but rather shifts it to the question of why, in similarly developed countries, housing prices differ to such an extent. In this section, I describe how the German residential building sector has remained a largely artisan-dominated high-skill domain where industry-based collective agreements assured a high-wage, high-quality equilibrium. In the corresponding chapter in Part II, I will show, by contrast, how capital-intensive construction companies introduced principles of Fordist mass production in the American single-family home sector, attempting to crush closed-shops and relying on lower skilled labor.

The 1920s witness the first realized attempts to industrialize the housing sector but productivity comparisons still leave the sector below average, following the investment good but leading most consumption good productions (Fischer 1976b:805). In the short rental housing boom of the Weimar settlements in 1924 to 1928, larger *industrial* construction companies such as Philip Holzmann entered the housing construction market and prefabricated slabs were used for the first time on a larger-scale in residential construction, much criticized by associations of the *Handwerk* (Lane 1986:132). These rationalization developments, associated with ideas from the *Neues Bauen* architectural schools, also found its expression in the foundation of the a public institute for mechanization in the construction field. These construction developments were to lay the ground for the post-WWII housing boom. Nonetheless, construction productivity remained the lowest in the housing sector after 1978 (Bartholmai 1994) and was found to lie 30% lower than in the US (McKinsey 1997).

The production of prefabricated *individual* houses, on the other hand, never really took off in Germany and constitutes an average of about 10% of the market for individual homes (less than 5% of all units, if at all). The absolute number of roundabout 10.000 annual units did even decline over time though relative numbers temporarily increased as they reflect the more volatile overall housing cycles. Companies in this sector have never reached a large-capital mass-producing size and pertain to the quality-goods producing *Mittelstand* whose products tend to imitate conventionally built houses in both design and pricing. This contrasts starkly with the United States where "[…] in 1994, mobile homes, construction-kit houses and the traditional construction with prefabs amounted to 62%. In 2003, modal buildings and prefabricated houses of wooden or metal construction constituted 56% of the US housing market" (Simon 2005:306).

Figure 14: New construction by prefabrication type

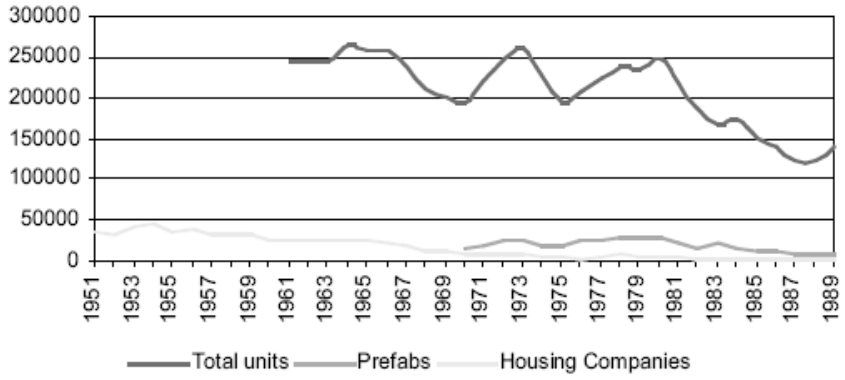


Table 3.4.1 One and Two Family Homes Built in the Federal Republic 1951-89 as prefabs and by housing construction companies compared to total number built[353]
Source: Woheinheiten insgesamt und Fertighäuser - Statistisches Bundesamt Wohnungsunternehmen - Bundesverband deutscher Wohnungsunternehmen e.V. (unpublished table)

Source: (Staub 2006:133)

Prefabrication of parts of or even entire housing units reaches back to provisions for the Prussian military in Germany. The British troops did already draw extensively on privately prefabricated units during the Crimean and Boer Wars, whereas Prussia came to use these "barracks" on a wider scale in 1870, making the term known internationally (Junghanns 1994:11). From this time also stem the first bigger companies of mostly southeastern origin where the prefabrication of wooden buildings also had a tradition in the civil sector. Their production found a steady traditional demand especially in the Alpine region and soared temporarily in times of economic or post-war crisis, when housing shortages and high prices for traditional products opened new markets (Simon 2005:30f). But whenever prices tended

back to normal conditions, the conventional solid home construction occupied its default case position again (Simon 2005:30).

By the 1920s, the combination of the armed concrete invention, the impetus of the new architectural movement and cooperation with housing-tax using left-wing municipalities led to the introduction of prefabrication with heavy slabs as the first viable alternative to traditional modes of production in Germany. Especially the housing reformer capital Frankfurt, its liberal mayor Landmann and architect-city-planner Ernst May constituted a laboratory for the attempt to produce low-rent social housing units in suburban settlement through the use of large-scale prefabrication and mechanization on site (Kähler 2000:330ff); similar conditions existed in Dessau, centre of the *Bauhaus*, and Berlin under the leadership of the social democrat planner Martin Wagner. Though attempts were made to invent an entirely prefabricated single-family house as well – Gropius showing such an invention at the Weisenhofsiedlung in Stuttgart –, no new marketable solution emerged from these experiments (Herbert 1984:51ff). For a short period only, steel companies – using over-capacity in civilian industries much like after WWII – came up with company settlements with prefabricated steel frames, but steel prices, demand for traditional products and persisting quality problems made this a temporary endeavor (ibid.). The persisting quest for an equally light and durable building material besides wood – which had seen a steady disappearance from German housing construction throughout the 19th century – left the single-family home sector without major prefabrication, while concrete slabs could make inroads in the social rental housing construction in the 1920s (Junghanns 1994:146).

During the Nazi era, much thought and experimentation went into typifying mass-producible single-family homes. The initial rural romanticism and programmatic flirting with the *Handwerk* gave soon way to ideas about using modern mass production for housing large families, for the hoped-for resettling of eastern regions and finally for projected reconstructions of German cities. The *Deutsche Arbeitsfront* and the *Reichsheimstättenamt* became carriers of these standardization plans. Obviously, most of these ideas were condemned to exist only on paper with Ernst Neufert's plans about a "housing machine", a factory producing tenements rows along a rail, being the most sophisticated output of Speer's standardization commission (Simon 2005:39). The de facto prefabricated construction during that period mostly relied on the existing tradition of military and emergency housing for the new arms production facilities and the air-raid victims. The lower-priced settlement constructions were achieved by exploiting the user's labor force in construction, by using cheaper materials and by lowering the housing standards (running water, electricity) set in the Weimar settlements (Harlander/Hater/Meiers 1988; Führer 2002). It was not achieved, however, by prefabrication. An indirect effect of the Nazi rule was the emigration of many members of the modern architectural school, including

Walter Gropius and Konrad Wachsmann, whose “dream of the factory-made” single-family home found very fertile ground during and directly after the war in the US, where Wachsmann’s company participated in a short post-war boom in the mass-production of veteran housing units (Herbert 1984).

Directly after WWII, there was a short boom both in ideas of solving the housing question through more prefabrication and in actual provision of urgency shelters with such units. The former inspired especially members of the former arms production to shift into housing provision, such as Messerschmitt’s steel-frame buildings (Hafner 1993:82ff). The latter, especially the notoriously provisional *Nissenhütten* of corrugated iron, instilled the hard-to-reverse conviction in the German post-war population that prefabricated housing was necessarily of less durable quality and only temporary solutions, a reputation that was subsequently reinforced by real qualitative deficiencies of the early producers of single-family home prefabs in the 1950s and 1960s who tried to serve the lower market gamut. “In the 1960s and before, prefabs were the “trailer homes” of German society – houses for a class just able to afford their own house instead of renting. [...] The conventional house was considered a “better” house, both because it was individually designed, and because it was built “more solidly”, i.e. of masonry. By the 1980s, this belief was still widespread, although the conventional houses and the prefabs had often become almost indistinguishable, both in appearance and in plan“ (Staub 2006:152).

Although companies offering prefabricated houses were able to overcome the initial obstacle their predecessors had themselves produced, they remained far from becoming mass producers of widely purchased housing units, a role for which a media and bureaucracy hype saw them predestined in the 1960s (Spiegel 1962). Instead, only two companies reached temporary outputs of more than 1000 units annually, with most not transcending 250 (Simon 2005:129). Individual buyers approach the company via catalogs or regional dealers or exhibitions purchasing the house at a fixed price which is subsequently constructed within several days at best on the land usually brought in by the buyer himself. In spite of their assimilation to architecture and style of conventional housing – thus serving the same preferences – the middle-sized companies occupy a market niche in offering even more extravagant and expensive products than standard houses (ibid. 192). Several institutional factors can account for this phenomenon (Fehl 1988b:617; Simon 2005:84f): especially in the beginnings of the industry, companies had to struggle with conservative attitudes concerning new materials and construction techniques among permit-issuing building authorities and mortgage-issuing institutions of which some were overtly against using prefabs as collateral. The locally heterogeneous building codes, with the federal *Bundesbaugesetz* of 1960 only sketching

general norms, also meant no automatic recognition of new materials or constructions across all local governments. With the non-profit housing associations engaged in slab construction of rentals, the entities containing most housing capacities did not enter the individual-housing prefab sector with few exceptions. The tradition of massive cement and stone production had also created strong ties of the traditional building sector with typical building material providers who remained hostile towards many of the prefab-companies using new materials. In 1975 brick producers tried to exploit ongoing quality problems of prefabs by running ads comparing them with emergency barracks (Vangerow-Kühn 1984:75). Finally, the craftsmen as traditional construction companies with strong local roots and political organization reacted each time the prefab-providers threatened to enter their hunting grounds; companies best years were times of scarcities and high wages of skilled construction workers (ibid. 19).

Handwerk's *legacy*

This last reason is indicative of the wider political economy of housing construction to which I now turn. Generally, there is a division between countries where the industrial organization of the building sector is rather collective and maintains a high-skilled general workforce – often with strong traditions in craftsmanship – and those countries where organization is less strong, generally lower skills prevail and the construction sector has grown in a more capital-intensive industry (Bosch/Philips 2003). I argue that the first group of countries tends to correspond to low HRs as the construction of individual family-homes remains a core concern of the craft masters relying on high skilled labor and producing relatively unstandardized, higher quality and higher priced houses which therefore become less accessible to broader strata of society. The higher qualification standards to set up a crafts shop and the high skills acquired in combination with the strict norms of quality regulations successfully maintain a specialized production domain, not conquered by Fordist mass production. In what follows I draw on literature of skill regimes, mostly illustrated for cases of industrial workers (Thelen 2004), to explain how, in the construction industry as well and even foremost, Germany produced a high-skill regime resulting in higher-priced, norm-regulated individual homes.

A number of indicators support the high-skill regime thesis for Germany's construction sector. Generally, German-speaking countries have much higher numbers of apprentices in their workforce (6-7%) as compared with English-speaking countries with a 0,3% low in the US (Elbaum 1989). Also the German percentage of qualified workers in the workforce, having some education beyond compulsory public schooling, is almost double the British one, with 67,4% German and 37,2% British skilled workers in construction (Prais 1981). Much of the difference has to do with the different extent to which *Handwerk* firms survived

industrialization: this German sector has been estimated to be 2,5 times the British one in terms of firms, employees and output (11-12% of GDP) (Doran 1984:5f), with 33% of all *Handwerk* firms with 42% of all *Handwerk* employees working in construction in 1980.

The construction sector can be divided into firms fitting in the legal category of *Handwerk* and industrial firms which have to give proof of industrial production methods if their activity overlaps with those of the *Handwerk*. The latter has necessarily to rely on the work of master craftsmen who has to be enrolled in the *Handwerk* register of the local chamber. Industrial companies are compulsorily enrolled in industrial chambers. Contrary to countries like France, there has been no employment or turnover ceiling for *Handwerk* firms in Germany which is why firms of much more than 20 employees are not rare. There is nonetheless a clear division of labor in the construction sector between larger, more capital-intensive firms working with prefabrication and in civil engineering and the many smaller *Handwerk* firms whose primary concern is the traditional building. In 1951, for instance, the building sector counted 64.343 firms of which 94% *Handwerk* firms with 960.882 employees of which 66% *Handwerk* employees; while 87% of the *Handwerk* firms were smaller than 20 employees, this held only for 30% of industrial firms; in other terms, industrial firms had 85 employees on average, *Handwerk* firms had only 10 (ZDB 1951:130). These patterns were leveled out until 1998 as, on the one hand, the group of industrial companies developed a 1-to-9-employees firm percentage of 78% itself, and, on the other hand, more *Handwerk* companies developed into larger companies. But still, among the biggest companies are industrial ones. At the same time, the following table establishes the mentioned division of labor between the traditional smaller-firm house building *Handwerk* and the civil-engineering industry (see bold line).

Table 4: Firms, employment and firm size in the construction sector

	Crafts			Industry		
	Firms	Employees	Per firm	Firms	Employees	Per firm
Pre-construction-site-works	604	9397	16	3933	32446	8
Public works, bridges, tunnels, etc.	28741	577073	20	3444	154159	45
Civil engineering	4247	156904	37	849	78765	93
Building construction (without prefabs)	**23014**	**372584**	**16**	**1698**	**48792**	**29**
Prefabricated buildings	300	6037	20	258	5850	23
Bridges and tunnels	24	959	40	68	2447	36
Pipes and cables	1156	40589	35	544	18305	34
Roofing	10019	114296	11	223	2365	11
Sealing and proofing	1441	8821	6	8261	20368	2
Carpentry and wood fabrication	9202	79147	9	165	1258	8
Roads	2425	68334	28	834	39683	48
Railroads	46	2704	59	107	7423	69
River engineering	42	1149	27	50	1474	29
Other civil engineering	3805	73575	19	3705	60897	16
Scaffolding	820	9179	11	1762	12278	7
Total	56333	934496	17	20722	320073	15

Source: (ZDB 1998:169)

Not only does the *Handwerk* constitute the majority of firms and employees in the construction sector in general and its relatively stable 40% share of housing construction in particular, it has also disproportionally contributed to the vocational training of apprentices. After WWII the percentage of apprentices taught in *Handwerk* firms has oscillated fairly stably between 80 and 90% of all apprentices, i.e. more than the *Handwerk* can absorb in its own labor force after the apprenticeship. The vocational training system became questioned both in the 1920s and 1960s as it did not seem to produce sufficient apprentices and sufficiently trained ones for larger building projects. Whereas in the 1920s large building firms briefly privatized the training in specialized own training building sites, the Nazi regime soon levied a compulsory training-fee that all companies had to pay to finance an extended training on building sites across Germany (Streeck 1982). In the 1960s, the now comprehensive construction union, industrially organized, was able to negotiate with both the *Handwerk* and industrial construction associations the inclusion of a compulsory training fee to finance an additional non-firm and non-school part of the apprentice training that would qualify workers even for more specialized construction

projects (Streeck/Hilbert 1991). As the fee was generally levied but paid according to the apprentice-contribution made, *Handwerk*-companies were implicitly subsidized by the industry through the fee. When in the 1990s in the course of the single European market more foreign construction companies outbid German ones by paying lower wages to their foreign employees, the higher skill equilibrium was once more protected by the Posted Workers Directive that obliged foreign firms to follow German labor norms when acting on the German market.

Handwerk construction firms are either directly contracted by individual households – in 1978 they made up roughly 50% of the contracts of all building trades (Beckermann 1980:92)– or are subcontracted by a general builder who sells the finished house at a fixed price. Though the latter form of contract has gradually risen since the 1960s, the high number of directly contracting households bespeaks of the enduring tendency of custom-designed housing production. The high number of private individuals acting on the construction market to cover their own housing provision is also reflected by Germany's low interest rate sensitivity in housing construction and the even negative correlation of housing profits and new production (Golland 1996). Ball found for the 1980s that 75% of all single-family housing construction starts were at the demand of individual households, while in the US the same number was produced by housing promoters for the market (Ball/Harloe/Martens 1988:107f). The strong ties of the family-home constructing *Handwerk* and the civil-engineering and large-rental-housing constructing industrial construction companies was also revealed by the former rising in importance each time the family-home construction part rises as in the 1970s (Beckermann 1980:55).

The market of construction for *Handwerk* firms includes commercial clients and the public authorities. Contrary to more centralized countries, public contract volumes on lower governmental levels are exceptionally high and authorities are said to discriminate in favor of local firms. The multi-tiered and dense formation of public and private trade associations reflects these different levels and constitutes an effective interest group machine (Streeck 1989).

To summarize, this evidence confirms the view that building single-family houses in Germany is still a local affair of individuals contracting smaller sized firms for custom-designed products, built on-site by artisans having undergone a traditional, though adapted apprenticeship program. One result of this production mode is its higher price and individual quality. On the consumer side this goes along with longer waiting periods for necessary savings as well as a stronger willingness to get settled once and for all in the same place, thus reducing the turnover in the cheaper secondary market. This leads to a stronger exclusiveness of single-family houses in Germany through conditions that have to do with the organization of their production sector.

Excursus: The indirect and direct influence of the GDR

Part I was explicitly meant to oppose *West* German housing production regime history to the United States. West German housing, however, has not developed entirely independently of from East German tendencies; moreover, the integration of the East German housing stock has had a further depressing effect on the overall German HR (cf. Figure 1). This section therefore briefly deals with the housing case of the German Democratic Republic (GDR) for two reasons. On the one hand, the permanent comparison with what happened on the other side of the iron curtain indirectly reinforced in many respects the path the Federal Republic of Germany (FDR) went along (1). On the other hand, if my argument about long-ranging influence of 19th-century tenement cities is by any means plausible, then even the 40-year interruption through a socialist regime, bringing East Germany in many respects much closer to other eastern European countries than to the FDR, should have left some recognizable past legacies (2).

(1) The GDR's housing policy consisted of a number of elements that were used as clear demarcation line on the side of West German housing politicians (cf. Topfstedt 1999): the use of large-scale expropriation of large land-holdings were one of the reasons land distributing reforms did not succeed in the West; the compact city ideal in the city-planning guideline was opposed by a lower-density garden city ideal in the West; the permanent caps on private rents in the East were seen as creeping expropriation of private landlords in the West and used as an argument to free rents in 1960; the massive use of industrialized prefabricated slab-housing of rental units in the East was generally used by homeownership-ideologists in the West but also discredited the strategy due to its simultaneous destruction of the artisan sector of small independent entrepreneurs; the growing percentage of direct state or cooperative ownership in the East was taken as negative example of where the destruction of small landlords could lead to. Most of these demarcations reinforced the large private landlordism with market rents, the artisanal sector and its non-prefabricated individual-house production.

(2) The GDR housing policy did indeed resemble much more that of other Eastern European countries and possibly France. At the same time, there is a range of observations that speaks in favor of continuity theses. First of all, the regressions at the beginning of this chapter did also include major Eastern cities and for them also the significant effect of the Empire-tenement variable holds. Secondly, it is surprising to notice that among all other formerly socialist states East Germany's HR is very far from being beyond 70% (Pichler-Milanovich 2001:162).[36] Much to the contrary, the percentages of housing units owned, rented and socially rented are much closer to West Germany than to any other European country. Some of the explanations of

[36] Possible exception to this rule are also the Czech Republic and Poland, both countries equally participating in the private rental heritage of tenement cities in the 19th-century.

this fact are in line with my argument: For a socialist country, the GDR still had a considerable amount of private property in 1989: 41% being in private, 17,7% in cooperative and the remainder in public property of the 7 Mio. housing units in 1989 (26,5 Mio. units in the FRG). However, only 25% of the property by 1990 was owner-occupied, the remaining dilapidated private stock being rented. After unification a number of mechanisms favored a development along Western lines: much care was given to the restitution demands that often concerned inner-city buildings; rent subsidies even with special supplements were distributed to ease the transition from the typical 2% rent-to-income ratio in East Germany to market levels; renovation subsidies for inner cities (Tosics 2005:59) and demolition subsidies for the high-rise suburban multi-family units were made, while parts of the non-profit housing sector was privatized, mostly to landlords and not to sitting tenants, while other parts remained property of non-profits or municipalities. The privatization of many of the multi-unit dwellings often failed as much as conversions of rental into owner-occupied units remained limited. In the construction boom of the 1990s, numbers of artisan firms that had been crushed by industrial construction firms in the GDR increased to reach the western levels again (ZDB 1998:56), while their average size equally declined to the western size of small and middle sized firms.
In many respects, therefore, even the disruptive socialist experiment in the GDR could not entirely reverse the German housing path, characterized by the heritage of compact tenement cities of private rentals, under strong municipal rule, a mortgage-bank including housing finance market and an artisanal production of single-family homes.

Conclusion

Almost all historic and recent surveys about German housing preferences reveal a higher frequency of homeownership-*desiring* than actually home-owning respondents. In this chapter, I have tried to account for this intra-national puzzle by arguing mainly that historically grown supply structures in form of the physical shape of cities but also the institutional set-up reproducing it have channeled subsequent housing choices towards more tenancy than ownership. German cities had already inherited a dense form, tenement buildings and private rentals before their expansion began. Faced with 19th-century mass urban immigration of lower-income classes, municipalities tried to maintain orderly developments with mostly street-layout and building-control instruments which otherwise left leeway to private speculation. Building norm and infrastructural requirements, an abutter-mode of financing, low wages of most workers and financial interests of landlords dominating city councils, financed by private mortgage banks, produced the tenement buildings along the sketchy lines of early city-extension plans. Local network industries in municipal ownership also entrenched the once

established city-developments for reasons of economies of scale rather than pushing the city outward in further suburban speculative developments. This type of local governance disadvantaged, however, suburban self-help settlements on small individual lots. Privately developed suburbs of individual homes also remained a marginal upper-class phenomenon. These alternative modes of city-growth, that Part II will expose in the US, would have been more favorable for suburban cities of smaller houses and thus early homeownership development. As much as the access to land was therefore more restricted in Germany, access to smaller sums of capital remained out of reach for many urban settlers. Unlike the local-savings-club-like American SLAs, rental-housing preferring mortgage banks became the dominant specialized housing finance institution, while cooperatives and limited-dividend associations emerged as institution aiming at lower-income-class housing. The latter, however, due to demand-side and land-price constraints also tended to construct mainly rental buildings.

This non-profit housing circuit was to supplement the private-rental construction during much of the 1920-to-1970 period, when the state intervened heavily along the lines the pre-intervention institutions had determined, i.e. in form of construction subsidies to non-profit housing associations. This circuit was further reinforced by party-politics on the municipal, *Länder* and federal level. The existing capital-collecting, yet not housing-specific deposit banks in Germany led to the belated rise of the *Bausparkassen* and therefore a late entry of homeownership-specific finance. Meanwhile, the continuity of private ownership structures, existing land parceling and public infrastructure maintained many of the once-built cities in their place. The growing vested interests of both landlords and tenants concerning the private rental stock maintained this circuit and, combined with the weak legal tradition of apartment-ownership, led to fewer conversions of rental into owner-occupied units than occurred in countries with single-house traditions and more unbalanced legislation towards either tenants or landlords. Finally, the artisanal mode of single-family house construction and building land supply, restricted through municipalities and large housing estate developers, restrained large-scale single-family house suburbanization movements of similar extent as those revealed in the American case.

Part II. United States, nation of homeowners

The case of the United States serves as a counterpoint to the German case as the American rate of homeowners started at a higher level prior to direct governmental housing policy and as it showed stronger growth afterwards. In analogy to the German case, this part starts out from the rapid phase of urbanization in the US after the Civil War, not without mentioning prior particularities specific to the settlement-society character of American cities, which lack a feudal past. These factors should not be underestimated and explain why prior to government intervention the world of American housing and homeownership was much closer to other settlement societies, including those of Hispanic origin, than to the British motherland. Again, like in the previous part, the urban level of analysis will be prevalent in describing the path-setting events which I find to lie in the private character of American cities, as revealed in its private land, infrastructure and transportation regime (1.1), the rise of building and loans as financial institution instead of mortgage banks and non-profit housing associations (1.2) and finally the development of a construction sector built around wood, prefabrication and lower-skilled labor (1.3). The second chapter makes plausible that these distant events are still explanatorily relevant, not only for the historically higher homeownership *levels*, but even for today's HRs. It does so by tracing the institutional and physical continuities with regard to the private city (2.1), housing finance (2.2) and the Fordist home production (2.3), which possible path-breakers such as the New Deal or Johnson's Great society could not change.

1.1 The creation of suburbanized cities

Both the absence of strong feudal shackles and the "private city" character of American municipalities in the 19th century set the stage for the creation of suburbanized cities, more receptive to later owner-occupied units, than their compacter European counterparts.

Absence of feudalism

It would be wrong to suppose that elements of the traditional city – city walls, municipal land, the commons, guilds – had been entirely absent on the American continent. In the English-speaking colonies, the British municipal incorporation was adopted by American cities whose body of aldermen and councilors came soon to be dominated by local trade co-opting oligarchies; trade representatives determined access conditions to their respective trades, regulate price and quality. They also organized commercial events, markets and even workshops for the unemployed (Teaford 1975:4ff). And townships were even in the possession of municipal land (ibid. 29).

But already before the Independence, reformers developed ideas that were to revolutionize American municipal government by the 1830s: universal suffrage of local government, no taxation without representation, abolition of trade monopolies and controls, inviolability of city charters. The Independence alimented a general urban opposition against the authority-laden form of city government known from the colonial period so that by the early 19th-century local voting restrictions for men, governmental price, quality and vocational access control were waning. To protect democratic city charters from misuse and manipulation their amendments remained a competence of the states, thus restricting local autonomy on the city level (ibid. 74ff).

While American cities thus freed themselves quite early from these previous restrictions, other feudal heritages, amongst them the administrative apparatus characteristic of centralized absolutist regimes, had never existed. Lewis Mumford, the vociferous anti-urban intellectual in the American tradition favoring decentralized cities ([1961] 1979:386), traces back the close link between non-democratic regimes and the growth of large tenement-cities with undesired hygienic and moral conditions. Major forces behind the centralization were the military and administrative requirements of non-democratic rulers. Through much of the 19th-century the US military, however, was staffed with less than 10 persons per 10.000 inhabitants, while both the German Empire and particularly Prussia oscillated around numbers of more than 100 persons, even in times of relative peace (Banks/Wilson 2013). The same holds for the number of civil servants in administrations and schools who often had to settle in cities – these centralized structures were largely lacking before the New Deal expanded state employment (Skocpol/Finegold 1982:261). All of these features representing a stronger centralized state have the tendency to go along with larger cities bearing the possibility of tenement buildings, housing state employees. Whereas in Germany these well respected and often mobile strata (Wette 2011:52,60), centralized in administratively or militarily important cities, constituted a constant demand for urban apartments, their status somewhat ennobling tenancy as well, correspondent strata were lacking in the United States. Moreover, many of these features were negatively associated with old European structures and a widespread anti-urban sentiment in America sought to not replicate large dominant cities (White/White [1962] 1977; Lees 1985:103). State capitals, for instance, were deliberately chosen as small insignificant places and Washington's presumptuousness did not pass uncriticized (Reps 1965:263).

The absence of an urban clientele of decent tenants is reflected in the absence of the continental tenement building type tradition. Among the first multi-unit dwellings in 18th-century America were early tenement houses for low-wage workers which were perceived as an unnatural phenomenon since the standard of judgment was the typical low-rise single-family house and

not the decent civil servant rental accommodation. In fact, the term "tenement" denotes the class-specific type of multi-unit building from which the "apartment"-building for the better-off has been semantically distinguished (Sutcliffe 1974:1). The traditional form of 19th-century middle-class inner-city housing of local businessmen were lodgings, noble boardinghouses, out of which, notably in northeastern cities, the American apartment-houses emerged in the 1860s in NYC. These were comfortable if not luxurious inner-city accommodations in roomy flats, often with hotel-like service which successively adopted modern conveniences, making the apartment also a preference of the women's movement (Cromley 1990). Their origin can indeed be traced to the early hotels, often the only possible accommodation for migrating strangers in Western cities, where individual chambers went along with jointly used services; these early hotels already served an upper-class segment and predestined the architectural style of later apartment-buildings (Sandoval-Strausz 2007). At the same time, they had to struggle against the reputation that went along with the existing multi-family dwelling type, the worker tenement, associated with every undesirable feature 19th-century reformers could think of: mixing of different classes, high rates of deaths and diseases, non-privacy of families, alcoholism, prostitution and poor citizenship (Baar 1989:12).

This general suspicion found its expression in early American building codes which often restricted the height of new residential constructions to avoid the construction of high-rise tenement buildings that were perceived to be un-American. NYC with its incoming immigrants often served as specter of an undesired Europeanization of living conditions; the higher-rise tenement buildings as much as the early apartment-house generations remained restricted to the north-eastern cities (Barrows 1983). Not surprisingly, it was New York reformers who came up with the first tenement laws and the most advanced building codes to enhance the unavoidable tenements, whereas the rest of America, associating tenements with the un-American class society and European collectivism, tried to protect its cities from an invasion of this building type. Nonetheless, prior to WWI roughly a third of the housing production consisted of more-than-one-unit structures, roughly half of which was in structures of three or more units (Grebler/Blank/Winnick 1956:333). Typical middle-class tenement building as reflected in feudal building types or Haussmann's flats were therefore not widespread outside NYC, where it emerged as luxurious upper-class housing alternative. The ostentatious architecture of NYC's apartment-houses reveals the need of distinction and tries to imitate the lacking noble origins of European central-city palaces and *hôtels particuliers* (Hawes 1994:22ff). Row- and townhouses, two- or three-deckers constituted other urban types of rental building in eastern cities. Prior to WWI many rental units were newly constructed in two-unit building structures. Single-family

homes were important as rental units as well and still in 1950 one-third of all tenants lived in these building structures (Winnick 1958:27).

Another feudal absence concerns the younger local governments which, much like their national counterpart, often lacked the necessary capacity necessary to channel new immigration in rationally designed planned city-patterns. Most early settlements were given charters by state legislatures that expressed only a minimalist vision of governance that lay in the hands of very few trustees whose sole purpose was often reduced to guaranteeing order and attracting further settlement. Much like Prussia could already rely on a strong administrative capacity before it industrialized, German cities often had century-lasting traditions of self-governance that they proudly maintained against feudal authorities, whereas in American cities, the local governance was first identified as the liberty-restricting colonial power, then as the redistribution-demanding mechanism of the political machine. Both translated into little interest to delegate more intervention power and administrative capacity to the city.

Yet other feudal absences are connected to the younger age of most American cities. Through the 19th-century and even beyond, Western cities still had to be founded or were yet in their infancy. Lionel Frost (1991) made the interesting observation that these younger Western cities within diverse Anglo-Saxon countries came to share many common characteristics during the "settlement revolution" (Belich 2009) that distinguished them from their eastern and European counterparts. One of these characteristics has been the preponderance of detached single-family housing units as compared to multi-family units and apartment-houses, more often found in New York, Cincinnati or Providence. At least at the beginning, Western land was much less encumbered by existing property constellations and much more available than around European cities. The heavy speculation with urban land, however, very soon eliminated this initial difference and the beginning skyscraper-construction of the young city of Chicago in the 1880s offers a visible reflection of how high land prices could climb (Gottman 1966). The ever more permissive height restrictions in American cities became in fact a distinguishing feature from the 1890s onwards. At the same time, the younger age of cities allowed them to be constructed given the newer established transport technologies allowing for greater initial sprawl. Here the timing of a transport introduction, not its ex-post level of provision, can make a crucial difference.

The economic function of these cities often consisted in serving as market through which rural hinterland products passed into foreign trade circuits, while manufactured products were sold, eventually also produced there. Demographically, the cities often lived on migrating natives who came much better equipped with savings and skills than many poor European immigrants flowing into the ports of the eastern cities, bringing along their low expectations concerning

housing standards (Frost 1991:67,105). Both economic and demographic factors allowed even the modest income-classes to settle on individual suburban lots in mostly wooden constructions. Not surprisingly, the so-called fire gap of the 19th-century – the spread between the population growth and the occurrences of fires destroying more than ten housing units – did not begin before the 1860s in the West, two to three decades after the East. Eventually, the different city types can also be considered as different functional responses to the growing fire risk of densely populated places: the European and eastern response consisted in strict inner city building codes demanding "[...] more durable, less flammable building materials, […] tiled rather than thatched roofs, and also brick rather than timber walls [...] (Frost/Jones 2007:341) – the opening of the German fire gap even dates back to around 1700 (Zwierlein 2011:87) – whereas in the West the resulting settlement in spread-out wooden houses in detached construction prevented urban fires from spreading. By 1920, the West had caught up and American cities developed the dual structure of publicly regulated fireproof central city buildings (Wermiel 2000), on the one hand, and spread-out suburbs of sufficiently large, paved streets and detached, yet non-fireproof cheaper houses in the suburbs, on the other.

Much of the US city-planning discourse consists of an Eastern critique of features connected with the spreading detached houses of the West – shapeless urban sprawl, land and energy waste, loss of communal centers – while an intellectual counter-tradition from Jefferson through Dewey to Frank Lloyd Wright praised the Western city type for its favoring of homeownership, equality of chances and democratic dispersion of power (Hall 1968; White/White [1962] 1977). Whatever the normative stance taken, the ongoing debate between centralizers and decentralizers only underlines the distinct city types whose long-lasting impact can still be noticed through the significant effect of the longitude variable when explaining single-family home variation in the 1930s or 2000s (see regressions below). Initially the West still had lower HRs because its younger population had accumulated less capital and bought larger housing units, but eventually the more homeownership-compatible detached house, easier convertible into owner-occupied units, made up the delay and led to the Western "City of Homes" (Abbott 2008:132ff).

One essential feature of virtually all new settlements, including most Eastern cities, that strongly contrasts with European cities is the gridiron street-pattern that defined rectangular blocks for housing construction. Whereas the northeastern, New England, formerly French or Spanish land divisions show irregular patterns, sometimes reminiscent of medieval towns, city foundations and extensions were usually undertaken in the gridiron form even there (Price 1995; Marcuse 1985). Philadelphia and New York served as examples to other cities, where diagonals or public squares are almost the only means of variation (Reps 1965:294ff). Especially in the

New England and Spanish regions, closed, compact villages with community-ascribed land tenure and the commons were not exceptional (Reps 1965:120f). California had been divided into large-ranch structures, on which later merchant builders could easily subdivide individual family-house lots to the thousands in the 20th-century (Eichler 1982:76). New speculative cities were often advertised according to the European ideal of closeness (Fehl 2004:66), whereas the gridiron pattern could in principle be reproduced without limits. Outside of this original colonial territory, however, the national grid pattern as prescribed by the Land Ordinance of 1785 was prevailing. The latter divided all western land into precise geometric patterns to be surveyed and sold to settlement companies or individual settlers by a Land office (Dick 1970:19f). Even if the land survey often *followed* actual settlement, state surveys, land companies and private speculators were likewise prone to apply the grid pattern as it was least demanding and standardized individual lots that could be offered more easily to absentee buyers or mortgagees.

The grid pattern in itself is not automatically linked to single-family home constructions, of course; grid patterns were also revived from antiquity by absolutist rulers appreciating symmetrically aligned tenement buildings; the first single-family-home suburbs were arranged along picturesque curvilinear and cul-de-sac arrangements according to new landscape ideals. In the American context, however, the often prevailing grid pattern can be said to have enabled later housing patterns: it transformed land into lots that fit individual homes very easily, it allowed easier self-built city extensions to be laid out by private developers without much expertise and its standardization made it an easily tradable commodity. It was also the measure by which war veterans or homesteaders were given public land in the 19th-century (Dick 1970:157f,210) to the effect that land became one of the most deconcentrated economic goods in the otherwise concentrating 19th-century economy, thus spreading a crucial resource for homeownership (Abrams [1939] 1979).

To a certain extent, therefore, the fact that especially the western United States were a settlement society much like other former British and Spanish colonies can, on the one hand, account for different urban forms going along with differing HRs. Thus, western cities in these countries all seem to share certain characteristics distinguishing them from the eastern and old European counterparts. On the other hand, younger settlement tradition and its encompassing economic-demographic features alone are not yet sufficient to explain the resulting differences in urban form and its consequences for homeownership. Systematic differences distinguishing formerly Spanish settlement cities noticeable up to these days already seem to suggest that institutional features do also matter (Griffin/Ford 1980). But even within the settled Germany, one can find considerable westward migration in the 19th-century leading to the from-the-

scratch creation of new cities, roughly comparable with new city constructions in the US. It bears emphasis that even these German cities, although showing less urban density and different building type traditions than the German east, correspond much more to the average German than American city type.

This shall be illustrated through the industrial city of Oberhausen, founded in 1862 in the Rhenish part of the Ruhr-area as mining, metallurgy, railroad and river-shipping town. Its 17.000 inhabitants in 1880 grew to around 100.000 by WWI to almost double again by WWII (Flora et al. 1983b). The prior building type tradition in the region were detached farm houses or miners' cottages; yet at the time of the first national building census in 1918, Oberhausen figured as a typical western city of densely and orderly built rental townhouses and tenements, showing even a below-large-city-average of 14% single-family homes in the housing stock and housing 55% of its population in buildings with four and more units (RWZ 1918). This resulting structure might appear even more surprising as other mining-related regions showed marked developments of cottage-settlements and as Oberhausen was at first under the early city-planning of companies (Honhart 1990), but still: "The new construction followed, with very few exceptions, the planned street-layout as basic pattern; wild settlements (*Wildwuchs*) or chaotic construction was definitely not happening (Reif 1993:117).

From very early on, therefore, the general street-pattern determining already 90% of later streets and the building codes from 1868 onwards laid out the basic plan for ensuing building construction in Oberhausen, whereas speculative land development without prior street-layout by the city was virtually absent (ibid. 120). City-planning, using the 1875 Prussian *Fluchtlinien*-law, could prescribe a minimum of two-stories for new constructions (ibid. 193), allowed for expropriations and for bans on undesired new buildings and prescribed the layout of public places and city beautification. It was mainly through these general plans that the city could manage a certain control over its development as municipal landownership, ranging between 6 to 14% of all city land, remained rather low in comparison with other German cities (ibid. 161). The strong reliance of municipalities on real estate instead on fees or indirect taxes made municipal land-ownership expensive beyond the purchase. Company housing never made up more than 15% of the stock and private rental housing, often growing out of retail stores, restaurants and hotels soon constituted the standard tenure, supplemented by non-profit housing associations from the 1890s onwards. As the city did hardly regulate whatever happened behind the street frontage, low-rise and higher-rise buildings were intermixed throughout the city. By 1913, the first zoning plan was passed, also with the intent to save some districts from the overly expanding multi-story tenements (ibid. 203). The entrepreneurs, managers and city councilors themselves were willing to create a representative city for which main streets with

flanking multi-story buildings with decent façades were a necessity, while the back-side of lots was often filled in with supplementary crowded extensions. The city itself added to the central construction of representatively looking buildings through its various municipal enterprises from the 1870s onwards. Up to WWI, the city provided a network of water, gas, transport, sewer, refuse-service and electricity supply, to name but the most important services, that was gradually extended to all living quarters, while at the same time inciting the city to attract more users to the existing supply instead of further decentralizing the network.

This short illustration should not entice one to the impression that the just founded city of Oberhausen designed itself ex-ante being in perfect control of the thousand different actors engaged in city construction. Widely scattered constructions along the laid-out streets, recurrently sinking mining ground and property interests of surrounding farmers and building speculators successfully worked against it. But in comparison to the private city constructions in the US, Oberhausen still showed much more intervention into the land market and always worked towards a conception of the city as a whole. The combination of explicit municipal plans to erect a genuine city comparable to other competing cities also with respect to tenement buildings along representative streets, the permanent influx of many workers without equity – local per capita *Sparkassen* funds were clearly below average –, speculative builders calculating with the city-prescribed grid and the municipal network industries help to show that the younger settlement age of American cities alone cannot account for their sprawled and low-rise-building nature.

*"**Private city" as local welfare regime***

Much like the feudal shackles in the German case, their absence prior to the large-scale post-bellum urbanization in the United States is not sufficient for explaining why American cities tended to become suburbanized cities of mostly owner-occupied single-family detached houses. To understand why, Sam Warner's aforementioned characterization of American cities as "private cities" captures some features that systematically differ from German cities and that help to explain the historic urban homeownership gap. At a time when welfare institutions were almost exclusively local, some of the welfare type differences between Germany and the United States found for the 20th-century national level can already be discovered in the different urban regimes (Lorrain 2005) that Mollenkopf labeled the Corporatist and the (American) Pariah city, respectively, where tolerated levels of inequality and segregation are much higher in the latter (cf. Fainstein/Fainstein 1978:134).

A first essential feature of the private cities as compared to German corporatist ones was the low degree to which local service provision and welfare was under municipal control. In Warner's words:

"They [Philadelphians] expanded the old functions of street repair, wharf and market operation, hospitals and relief to modern proportions. In addition, they fashioned a number of new municipal institutions – water and gas works, dispensaries, police departments and free schools. By 1860 the institutions and activities of Philadelphia's municipal government were established and have remained virtually the same ever since. Thus, many of the city's twentieth-century successes and failures have been determined by the capabilities and limitations of these inherited arrangements. The goals of the nineteenth-century municipality remained those of the Revolutionary era. The city was to be an environment for private money-making, and its government was to encourage private business" (Warner [1968] 1987:99).

Thus, at a time when German cities gradually came to municipalize large part of the local economy, ranging from slaughterhouses to public transport, American cities, but for some years during the progressive movement, relied much more on private licensing or outright business solutions for the post-1860 institutions of local governance. Many of the services that were to characterize the modern urban infrastructure – gas, electricity, urban transport, land subdivision and planning – was directly offered by private entrepreneurs or was delegated to them via long-lasting municipal franchises which often privileged local private monopolies and were used in clientelistic politics (Lenger 1995:323). Considering that until the 1930s, local governments had a share of at least 50% of total public expenditure and more non-school employees than the federal government (MacDonald 1986:12), these local government differences absorbed much of the overall governmental impact.

One crucial domain where this played a role for housing was the provision of urban land. Land regulation was almost absent in the pre-WWI American private city. The 1811 gridiron-extension plan of NYC remained one of the few publicly designed and planned *extensions*, as courts decided in favor of property-owners' compensations in case of extension-plans' negative effect on their property values (Sutcliffe 1981:92). The obligation of building permits was often established only in the later 19th-century, it was not always rigidly enforced and did not concern the non-central city parts. Moreover, building codes such as in Chicago liberally permitted wooden construction, at least outside of the city's very core. Direct government land-banking or land purchases were almost lacking, while much of the initial land provided by the government or initial street-plans for schools, parks or other public buildings was even sold prematurely. "Thus at the very moment when municipal projects needed to be enlarged to accommodate themselves to the ever-growing American city, the courts began to restrict municipal powers over land. Boston, even after a disastrous fire in 1872, was forbidden to use city funds to aid owners of private property in an ambitious redevelopment scheme for the downtown area" (Warner [1968] 1987:22). City-planning therefore either just followed the

original layout of a city-plan or even more basically followed the overall gridiron pattern of governmental land sales. Further lot-division was entirely in the hands of private individuals and private developers, aggressively developing and subdividing land, leading to the recurrent land price bubbles that accompanied American city-building. In contrast to Germany, where the surroundings of large cities were equally in the hands of speculating land companies, American developers gradually tended to include the building construction beyond mere trading in land also, thus offering more concentrated capital to enter the construction sector. Their developments extended cities aggressively in form of low-rise houses, private street-layout and often combined with new transport connections. At the same time, the liberal building regulations also offered self-builders more opportunities to set up structures that safety, fire-risk, hygiene and building-norms controlling codes would have prevented otherwise (Doucet/Weaver 1991:75).

A second, often highlighted, consequence of the private city was its segmentalism (Einhorn 1991:101; Wiebe 1975). Whereas in German cities building-code prescriptions intended to assure at least a minimum of equal provision with public infrastructure each time a new technology arose, American cities were much more tolerant towards segmented city developments, which allowed for the coexistence of widely differing standards of living dependent on the degree of public provision. German cities were of course far from offering the same living conditions in each district – the shocked descriptions bourgeois reformers gave of underprivileged districts are quite revealing in this regard. But with the advent of powerful administrations and autonomous city government even the worst districts contained solid stone buildings, erected according to approved building plans and to area land use plans, with paved and publicly cleaned, maintained and lighted streets, water, sewage, gas and eventually public transport and electricity provision by the municipality. In American cities, on the other hand, private companies extended their networks only selectively in line with profit considerations. European visitors returned often startled from American cities, whereas prior to WWI German cities managed a general outer appearance to the contrary (Rogers 1998:43; Hård/Stippak 2008).

A number of factors supported the division of the American city in a conglomerate of neighborhoods: most important, ethnic segregation was a common phenomenon in the 19th-century American city, which even antedates the increase in segregation along occupational and racial lines that is said to have taken place with the rise of a class-society after the Civil War and with the Great Migration. With the Irish and Germans in the first immigration wave, then with the southern and eastern European “new immigration” at the century’s end, neighborhoods could be singled out according to their dominant ethnic group, sometimes even reflected in the neighborhoods’ name (Glaab/Brown 1967:138ff). The neighborhood’s ethnic

identity was further strengthened by locally specific institutions, such as the banking institutions or interpersonal credit networks, churches of the ethnically differing denominations and schools which were either private or, when public, locally financed and therefore neighborhood-dependent, constituting a tradition of "localism" (Cohen 2003:228).

Many services, considered to be public in Germany, took on a neighborhood-based club good. Up to the municipal reforms inspired by the Progressives at the century's turn, the aldermen constituting the city councils were elected on a ward-basis so that each dominant ethnic group's interests were represented by one of their members, usually not arguing for programs for the city as a whole but for neighborhood-specific redistribution. This clientelistic constellation of local politics, prey to corruption through political machines – ethno-political groups using votes to tap city money and using city-money to buy votes and enrich their clientele – had been subject to a growing critique of the Progressive reformers. They sought to reinforce central elections, the public-manager role of non-partisan mayors and professional administrations (Hays 1964). Successive changes of charters around 1900 and also the prior delegation of ever more competences to special expert commissions away from the politically corrupt aldermen (Teaford 1984). This division of power was even reflected in the local government budgets, which became progressively fragmented into special-purpose budgets outside the aldermen's control. Aside from minor fees, municipal budgets received their principal revenue from the local property tax, whose high visibility invites to restrain local government's functions, to demand clear fiscal equivalences or else to revolt against it (Teaford 1975:110). This mode of financing has obviously differed from the German one, which relied more heavily on the increasing surpluses of municipal enterprises whose fees, even if visible, always came along with definite services in return.

It would be wrong, however, to suppose that districts remained unconnected to public infrastructure only due to private companies not finding sufficient profits there or due to imposed limits of ethnic politics. Rather, local homeowners opted deliberately for low service standards as they already had to struggle with land and house building costs. At the outskirts of cities and their suburbs, the costs of new settlement and homeownership of a largely immigrant population was only feasible if additional costs of infrastructure were dispensed with and then only applied gradually (Harris 1996). The system of special assessments, widely applied for the financing of street (and often concurring sewer) construction, is quite illustrative of this tendency. In many city charters, local residents were given the right to determine on their own when they wished to have their property assessed to determine their share in the abutters' financing of local street paving. Sometimes, the right just consisted in delaying the forced assessment by the city (Simon 1996) and sometimes, local residents had to organize against the

city to forgo special assessments (Nicolaides 2004:438). The result of these arrangements was a segmented city-building process with newer parts of the city often deliberately undersupplied with paving. 19th-century Chicago, for instance, was widely known as a city without streets (Einhorn 1991:50). This institution of local government, often applied in cases of public works and backed by the idea of strict fiscal equivalence, made room for a lower single-family-home segment by reducing the upfront costs necessary for new settlements. It helps to explain why in pre-WWI American cities the HRs of most recent immigrants, foreign-born and the working-class could systematically exceed the middle-class HR. It also explains why the HRs grew with distance from the city center which certainly has to do with the usual decreasing land price gradient but also with the looser grasp the city had on these developments. Lower-rise building types and lower property values are most important in accounting for higher immigrant HRs (Kirk/Kirk 1981) The ward-based ethnic bosses of the infamous political machine not only served the role to channel city-money into their ward, but also to keep assessments and taxes low for their clientele for it to own its modest homes (MacDonald 1986).

Not only were cities *internally* stronger fragmented, their external relations to incorporated or unincorporated suburbs was also subject to more fragmentation than in Germany, leading scholars to talk of "fiscal balkanization" (Edel/Sclar/Luria 1984:51). In the 19th-century, American cities witnessed an equally strong incorporation movement as German cities that, to historians' puzzlement, ended around 1900 (Nolte 1988). The fragmentation of suburbs according to race, class or ethnic categories can be put forward as one explanation. Moreover, most states required majorities in referenda of both suburb and central city population, when voting for annexation: the more one of two groups, especially the suburbanites, felt that taxation and representation were misbalanced, the more likely different local governments persisted. Suburbs also feared that city corruption and the sale of liquors that suburban temperance societies often had banned, could spill over, while the connection to public services still lured them. The more successfully incorporated suburbs could provide these services by themselves or through intercommunal collaborations, the less likely annexations could become (Keating 1988:118). To the extent that suburbs attracted and inner-city conditions drove out the middle-classes, independent suburban municipalities became increasingly successful.

Suburbanization, i.e. growing population, area and political autonomy of non-central city settlements, was a process that already began in the 19th-century. First modern occurrences of this phenomenon can be traced back to British upper bourgeois suburbs in the 18th-century, whereas the incipient American suburbanization has been closely tied to the rise of railway transport (Fishman 1987). Though Germany also witnessed excessive population growth at the outskirts of cities, sometimes even in form of the upper-class "colonies of villas", the crucial

difference lies in the form that suburbanization took: it usually did not grow outside of pre-established city plans which gradually incorporated suburbs and it grew in form of tenements.

The American suburbanization has often been contrasted with the European (and possibly Latin American (Schnore 1965)) city in that it was carried out by the middle-classes which in turn continued to occupy the city-center in Europe, where the famous red belts began to encircle the cities. Burgess, from the Chicago school, even generalized this phenomenon in the concentric zone model of American cities in the 1920s, considering it the natural urban ecology of growing cities such as Chicago (Burgess [1925] 1984). Though this rough contrast misses important phenomena like the apartment-house tradition, the industrial and blue-collar suburbs or the sprawling self-built suburbs in the US or the villa colonies in continental Europe, the suburban tradition relied indeed strongly on middle-class ideals which were perceived to become incompatible in central-cities full of immigrants, low-quality tenements and significant health problems. The middle-class flight can equally be interpreted as a private solution to the central-city health problem on which the governing elite had less grip than its European counterpart, which was more strongly endowed with non-democratic ways of urban governance. Another explanation comes from the stronger property-tax-reliance of the American municipal government whose payment suburbanites could evade very easily (Ghorra-Gobin 1991:43), whereas the property tax lost importance as revenue producer in German cities which relied on other taxes and the fees from municipal enterprises.

A crucial driver behind the American suburbanization was the more rapid adoption and spread of new means of transportation which helped to sprawl cities at faster degree, thus making available cheaper land for lower-rise housing construction. The mostly privately organized intra-urban transport transformed the small radius of the 19th-century walking city to the several dozen kilometer of private-car cities, thus making available ever cheaper land on the outskirts allowing for suburbanized lower-density family-home constructions. To be sure, the movement of the British middle-class to non-industrial suburbs – a model emulated both in the USA and on the continent – had already begun before first railroads connected them to the city (Thompson 1982). But it is hard to deny that the earlier successive adoptions of horse cars, electrical streetcars and automobiles with the latter aggressively replacing other higher-density urban mass transit was among the factors facilitating the model of suburbanized cities (McKay 1976:209). It was not just the necessity to construct more transport-kilometers for cities situated on much more urban area; rather the largely private organization of transport supply accounts for the sprawled cities. Several specific features of American cities explain why they adopted both streetcars and private cars more rapidly and why mass transit was not to survive against the private automobile.

First, beginning with railroad construction in the US, there was a close link between private companies' transport and land speculation involvement that was prohibited by law or by stronger (local) government involvement in transport elsewhere (Jackson 1987:124). Figures such as the businessman Yerkes in Chicago actively initiated transit lines to make accessible newly developed land whose speculative gains made the transport business only a secondary activity (Edel/Sclar/Luria 1984:222ff). Sam Warner in his famous "Streetcar Suburbs" showed how Boston's real estate monopolist Henry Withney used streetcars to connect deliberately new suburbs and avoid the feared European tenement city (1962:26). Flat tariffs, independent of travel length, even subsidized the most suburbanized travelers. Statistics show that American cities were by far leading in track kilometers and ridership from 1890 onwards, while European cities, with Germany in lead, caught up to a certain extent by WWI, when the peak in American ridership had already been passed.

Secondly, in most cities private companies under a municipal license were at the origin of horse- and electrical cars, although in Germany municipalities did also directly found their own competing enterprises and mostly municipalized formerly private companies in the course of the 1890s. License agreements in the US were much more liberal than German ones, i.e. more easily granted to more companies that were hardly regulated during the license held for much longer time periods (often 99 years). In Germany, by contrast, agreements included municipal control of construction plans to avoid unplanned developments, participation in companies' net profits, reversion of the built-up infrastructure to the city after license expiration and a clause permitting the city to buy up the company in the meantime (Krabbe 1985:66ff). Cities intervened also directly in the fare policies, often prescribing separate lower fares for commuting workers. The municipalization of most companies by WWI in Germany only affirms the principle of general provision, opposed to a market distribution that acted as *leitmotif* of city officials. The liberal license agreement therefore fell out of favor because companies were hesitant to open unprofitable lines, saved on maintenance and charged too high fares. Whereas lower fares to workers was a mode of municipal social policy in Germany, they were also used by American streetcar companies with interest in land speculation to attract the middle-class into their newly developed suburbs.

In the US, as the concentration of private streetcar companies progressed into urban, then even regional monopolies (Glaab/Brown 1967:185), municipalization, pushed for by the Progressive and socialist local movements, was also much debated as cities had to accept ever more disadvantageous franchise-agreements (Yago 1984:53ff). When it finally occurred in the 1920s, municipalities got into debts by paying high compensations to private companies and overinvesting in the lines' extensions, pushed by downtown business interests to attract more

people to downtown (Foster 1979). Eventually, they rather helped alienating people permanently from the downtowns.

Third, initial concerns about the aesthetic and social integration of streetcars slowed the European adoption but also was to make them a more permanent feature of the continental city's transport culture. Steam driven cars and overhead cables were anathema to many European citizens and to officials, proud of their native cities. Part of the later adoption can be explained by making the new technology compatible with the unobstructed appearance of historical monuments through battery systems or underlying circuits, through ornamented poles etc. (McKay 1988:12ff). At the same time, these features made the new technology much more acceptable to most citizens who began to consider them as integral parts of the city. The local public riders, the semi-skilled drivers of public transit, and – by the 1920s – the social democrat local majority grew to a strong lobby in favor of maintaining local public transit also as part of a local social policy. The mass transit networks, on the other side, had been laid out for denser settlements for the investment's amortization. Therefore, where remaining, they became one of the inert forces locking the city into denser structures of rental tenements.

To summarize, both the inherited freedom from feudal obstructions and the largely privately controlled booster cities in the urbanizing United States were much more likely to enable spread-out cities with low-rise construction than feudally enclosed, corporately organized social-municipalist cities in Germany. New building developments had to succumb to less strict regulation and infrastructural requirements due to weaker American municipalities and their general laissez-faire attitude towards many issues transcending local neighborhoods. Private transport entrepreneurs, speculating in suburban real estate, pushed city limits more aggressively than their municipal counterparts in Germany. This allowed for easier access to building land for residential purposes and for lower-quality, self-built structures on the urban fringes.

1.2 Building and Loans

On the finance-side of housing production, Anglo-Saxon countries in general and more particularly the United States developed specialized deposit-based mortgage banking institutions, thrifts also known as building societies, building and loan association (BLAs) and, in 20th-century America, savings and loan associations (SLAs), whose almost exclusive dedication to single-family home financing made them strong carriers of homeownership extensions in these countries. Though marginal mortgages also went into multi-family dwelling units or were used to construct single-family houses for rent, the building society movement,

organized in the Building and Loans League in 1893, made homeownership of single-family homes their explicit goal. They achieved this by including small savings into the capital circuit, by earmarking them for housing investment purposes, by institutionalizing ever longer amortizing mortgages and by promoting more generally ideas of thrift and homeownership (Mason 2004:64). "[...] B&Ls and S&Ls were the dominant provider of residential mortgage finance during the 1880s, 1920s, and the 1950s – the three episodes in the last century when the nonfarm housing stock expanded dramatically and rates of homeownership surged" (Snowden 2003:158).

At the same time, building cooperatives or limited dividend companies in housing never took off to the same extent as they did in Germany. To repeat, the crucial difference between these two different organizational forms was that while BLAs made collective savings possible, their goal, in spite of their name, was to permit the *individual purchase* of houses, but not to jointly construct them and manage their renting. The associations emerged as finance, not as housing institutions, preempting much of the latter US housing policy's focus on housing *finance*, not on construction subsidies. American savings went to a large degree into a special circuit institution in favor of housing investments for low-rise housing, mostly for homeownership, while, in Germany, *Sparkassen* were not housing-specific and remained closed to lower-income borrowers. Mortgage banks as housing-specific institutions, in turn, favored rental housing investments and *Bausparkassen*, most similar to the BLAs, did not emerge prior to the 1920s.

Building societies, i.e. collective thrift institutions offering loans to their members, have their origins as Friendly societies in 18th-century England and the erection of the first known American building society in Frankford, Pennsylvania in 1831 is a direct outgrowth of this tradition. At first, they mostly existed in the terminating form, i.e. the society did not survive the construction of the last member's house. Towards the end of the 19th-century, with the so-called serial, then the Dayton- and other plans, BLAs became permanent institutions that equally opened up to pure-saving members, thus competing with other thrift institutions for deposits. With these changes, the institutions were gradually transformed from member-based cooperative-like clubs to stronger bureaucratized bank-like institutions that could dispense with the thrift discipline of all individual members (Haveman/Rao 1997). In this development, thrifts differed from the German *Bausparkassen* that were founded as cooperatives for saving and borrowing members only, where exit without loss of all prior savings was impossible (Block 1931), principles that persist in relaxed form until these days. The American BLAs also did not restrain themselves to second mortgages like their later German counterparts, but they became the primary mortgage lending institution that gradually institutionalized the amortizing

mortgage at times, when paying mortgages back in lump sums saved in mutual or savings banks was still common. The regular payments corresponded well with the regularizing paychecks of the rising working-class and were less demanding on long-term foresight, while still instilling attitudes of thrift (Daunton 1990:260). BLAs introduced this longer-term amortizing mortgage form with relatively high LTV-ratios before the New-Deal-introduced governmental insurance standardized this type of mortgage. While amortizing mortgages or consumer installment credit has become the standard form of credit, the American situation starkly contrasts with the German Empire, where non-amortizing mortgages were dominant among the mortgage banks (Eberstadt [1909] 1920:425).

A number of conditions were favorable to the rise and spread of BLAs through the United States. First, the American banking system was still in the making in the 19th-century. Banks accompanied the move of the frontier and regulations often restricted banking activity to local states. BLAs were technically easy to set up and their club-like arrangement welcomed Americans that had grown weary of repeated bank failures. Though mutual savings banks existed especially in New England and the Middle Atlantic region almost to the same extent as in Europe, their branches were far from covering the entire country and counted less saving books than in Europe (Garon 2012:93). The success of the BLAs contributed to the decline of the relative shares of savings banks even in their home regions and impeded their expansion in new ones (Lintner 1948:51). This seems to confirm implicitly my explanation for the late rise of an BLA-like institution on the continent, where savings banks as competitor were much more established. Contrary to savings banks, the BLAs' investment of 100% and not only 50-75% of their assets into mortgages, the regular partially compulsory savings plans and the stronger member-based control instead of one from above requiring civic-minded philanthropists made BLAs the more adaptive banking institution outside of the northeast.

Postal banks, another competitor for collecting small savings, were installed only in the 20th-century, while life insurance companies preferred mortgage finance on farms or commercial property and national banks did not enter the mortgage business before 1900 (Snowden 2003:164). This leaves commercial banks which specialized, however, in short-term business loans (Behrens 1952). Both on the deposit-collection side and the mortgage-lending side BLAs thus encountered much less established structures and competitors than in continental Europe where institutionalized banking had a longer history. Against other banks, BLAs traditionally had the advantage of low transaction costs – at least initially, member administrated themselves – and of better information and sanctioning mechanisms concerning borrowers, as shown in relatively low foreclosure rates in the first BLA-survey in 1893 (Mason 2004:29). In the late 1880s a group of nationally operating BLAs, the nationals, arose, aggressively serving mostly

low-BLA-density cities, making higher profits from serving high-interest areas and saving in administrative costs. Both the real estate crisis of the 1890s and personal gain-taking led to the demise of this temporary phenomenon within the same decade, only strengthening the commitment to localism of the BLAs.

Secondly, next to the aforementioned supply-side factors, there was a specific demand for these institutions. BLAs filled a social niche in 19th-century banking market as workers and immigrants were hesitant to enter the higher sphere of commercial banks that moreover specialized on short-term credit only (Bühler 1965:16). The often small BLAs in a city were often as fragmented as the ethnically or occupationally segregated neighborhoods. More generally, BLAs were a local self-help response to the urban lack of capital and credit and resulting high interest rates that characterized much of the Western regions in the 19th-century. Their spread was no automatism, of course, as there were some urban centers entirely devoid of a local BLA in 1880, such as St. Louis or New Orleans (Snowden 2003:166). Also, there were clearly other factors behind new BLAs than ethnical or worker separatism such as realtors' instrumental creation of new financial institutions to extend credit access and demand on their markets (Snowden 1997).

Thirdly, BLAs constituted the institution probably most congenial to the mindset described in the frontier literature; "[…] the terminating plan was the material realization of a theory of thrift based on the pillars of mutual cooperation and external control" (Haveman/Rao 1997:1621). The image the BLAs gave themselves – through early pamphlets such as Edmund Wrigley's "The Working Man's Way to Wealth", where he counts on every working man becoming his own capitalist, until the advertisement campaigns of the United States League of Local Building and Loan Associations from 1900 onwards – was that of a quasi-religious movement, not an industry, that was on the side of Populists, small farmers and community businesses when attacking the big monopolies, a presentation that also served to legitimize the BLAs' exemption from corporate taxes in 1894 (Mason 2004:74). While the big corporate entities served as one common enemy, any kind of more collective form of cooperation such as the socialist experiments with production cooperatives of Owen's or Fourier's inspiration were equally condemned (Bodfish 1931:2). The joint ownership of housing facilities had generally a bad reputation to an extent that even made it difficult to establish modern apartment living for the upper middle classes because it was denounced as being communist (Wright [1981] 1983:145; Cromley 1990:20).

Finally, the institution found a variety of quite different supporters which made it a flexible partner in various coalitions. First of all, it was "[...] promoted with missionary zeal by a vocal group of "building and loan men" [local real estate business] who extolled homeownership as

the means by which workers could better themselves and their communities" (Snowden 2003:170). A second external promoter was found in the progressive movement and housing reformers who also appreciated the BLAs' role in integrating immigrants and decentralizing government. Ironically, progressivist values seemed to have promoted the adoption of the Dayton-plan in the BLAs that opened them to external savers and borrowers and whose stronger flexibility made more professional management necessary, moving BLAs from community clubs to institutionally trusted banking institutions (Haveman/Rao/Srikanth 2007; Zucker 1986).

BLAs' causal role in furthering homeownership is hard to deny at first: they collect, indeed make accessible new capital earmarked for the purpose of owner-occupied construction of single-family homes. The great majority of their mortgages flows into financing family-homes and their promotional activity, jointly with the Realtors' Organizations, has been said to create additional desires for homeownership. Even if yet many of the taken mortgages might have also gone in the construction for rent, the dominance of the single-family building type smoothed the way for easy later conversions to owner-occupied units. Moreover, much single-case historical evidence from the 1890-to-1930 period suggests that rising numbers of BLAs, their members and assets in mostly urban areas was behind the rise in both mortgage indebtedness that special censuses in 1890 and 1920 revealed. The fall of national homeownership through urbanization was also beginning to be compensated by rising urban rates (Snowden 2006f). In the Lynds' study of "Middletown", for instance, BLAs appear from 1889 onwards and were estimated to finance 80% of new construction in this dominantly single-family-house town, built in wood (Lynd/Lynd 1929:104f); 85% of their members had a working-class background and overall mortgage indebtedness was growing.

This often found anecdotic evidence about the BLA-homeownership-nexus, which even transpired into popular culture through Frank Capra's 1946 film "It's a wonderful world," can be supported by a more systematic regression of BLA's mortgage-market share on the percentage of single-family homes in 50 American cities in the 1930s. The unique historical data come from two surveys undertaken by the Civil Works Administration in the 1930s, the Real Estate Inventory and the Urban Financial Survey. Together they cover a common sample of 53 cities with at least one city in every state and cities of different size. Data were collected both through direct interviews and questionnaires of 15% of each cities' households on average (Wickens 1935). The survey yields the probably most complete historical housing data in various city and has been used by scholars (Brocker/Hanes 2012). Variables related to the business cycle have to be regarded with some caution as the sample of cities was surveyed during the Depression that might have hit some cities more than others. Although cross-

sectional, both the market-share in outstanding mortgages of BLAs and the share of single-family homes can be considered as proxies of past flow data and reflect therefore pre-1930s-developments.

The OLS-regression includes typical explanatory variables associated with single-family home dominance, above all the city's size, its geographical, demographic and economic position. Car-ownership should control for the degree of suburbanization. The percentage of BLAs in the mortgage market, controlled for mortgage interests, can be shown to have a significant effect on the dominance of single-family homes in the housing stock; the overall regression explains 66% of the variance. Note also the significance of wooden structure for higher single-family home shares, a finding that anticipates the discussion in 1.3 about the homeownership-enhancing role of building techniques with wooden prefabrication. A similar regression using the mid-1930s HR as a variable produces equally positive but non-significant results for the BLA-variable which is explainable by more sensitive small-sample size but mostly by the Depression-caused fall in homeownership which led to evictions, doubling-ups and conversion of owned into rental structures prior to the massive state interventions in favor of homeowners. The BLAs are responsible for a physical housing structure of typical low-rise buildings, more durable than temporary income-depressions, that is most likely to further homeownership.

Table 5: OLS (n = 50), dependent variable: percentage of single-family house structures in housing stock

	Coefficient	*Std. Error*	*p-value*	
Constant	146.395	39.6539	0.00070	***
BLA share in first mortgages	**0.165438**	**0.0975575**	**0.09810**	*****
Latitude	-0.996878	0.425269	0.02440	**
Longitude	-0.243584	0.182909	0.19088	
Autos per family	2.09064	12.5673	0.86876	
Share wooden construction	**0.200859**	**0.101748**	**0.05567**	*****
Average value one-family dwelling	-0.00820416	0.00247523	0.00203	***
Owner income 1933	-0.000620684	0.00752483	0.93469	
Rent-to-income 1933	-0.452844	0.726026	0.53653	
Effective interest rate for owners	-7.0341	3.43947	0.04781	**
Total buildings	-2.31967e-05	4.21412e-05	0.58523	
Population under 20 years	0.173918	0.111392	0.12674	
R^2 adjusted				**0,66**

This finding, however, should not lead one to overemphasize the universal influence of this housing finance institution. BLAs do not seem to be necessary or sufficient to expand homeownership. Cities with very little BLA-tradition were able to bring many households into homeownership and high-homeownership cities such as Philadelphia, the "City of Homes," owed their special status to other contributing factors also, the special land rent system in this particular case (Burk 1882). Another concern lies in the direction in the causal relationship between SLAs and owner-occupied single-family homes. The tradition of single-family homes, i.e. smaller houses necessitating less capital, certainly predates the rise of SLAs and could very well have generated the financial institution most apt in allowing the individual purchase of these houses. This could equally explain why the single Anglo-Saxon cities and countries where tenements were historically dominant, namely New York City and Scotland hardly developed any BLAs (Block 1931:29). If only existing dwellings were to be bought with institutional credit, then the building-type explanation of homeownership could probably work without reference to the financial institutions. But as new building construction can in principle take place in both single- and multi-family dwelling form, the mere reference to existing building types does not suffice. Even if the rise of certain financial institutions were caused by the existing building type, these institutions, once set up, could have lasting effect on the new building structure. What results from the discussion most certainly is a complementary relationship between the financial structure of housing credit systems and the physical structure of cities that create somewhat stable local equilibria in favor of *either* individual structures with deposit-based specialized mortgage institutions *or* multi-unit structures with bond-based mortgage institutions. With the economic tides turning, the former are more compatible to receive the waves of new homeowners.

Lacking social security funds and mortgage banks

But why did the US not settle in the latter equilibrium? In Germany, larger financial institutions such as mortgage-securitizing banks, life insurances and eventually social security funds have been identified as main drivers behind the extension of German tenement cities. In the US similar institutions, however, were not to arise or did so with a different focus.

First, the United States lacked social security funds that could have produced a non-profit housing alternative as occurring in Germany; the trade-off between a public-pension-cum-rental-housing system and a private homeownership system, found in international comparisons after the 1980s, seems to have very early roots at this critical juncture in the 19th-century. The absence of state welfare funds, responsible for rent-bound rental housing elsewhere, strengthened the homeownership alternative. Theda Skocpol pointed to the fact that broadly

applied veterans' pensions, amounting up to 25% of state expenditure in 1910, show the US-welfare-laggard thesis to be wrong; both extent and coverage largely exceeded most European welfare states in their infancy. Contrary to the compulsory German insurances, however, the veterans' pension program was tied to a particular generation with which it withered away and, more importantly, it was financed out of current state income, largely customs duty (Skocpol 1993:98), and not out of an accumulating fund providing room for non-profit investments.

The one "capital stock" that the government did use extensively and almost exhaustively consisted of the large amounts of land given for free to veterans and sold cheaply under the Homestead Act, even though it mainly concerned land of agricultural interest and further public settlement credits to cultivate the land were lacking. Contrary to the corporate recipients of the German social security construction loans, the homestead recipients could only be individuals.

Secondly, prior to the institution of mortgage-bond securitizing and trading governmental agencies in the 1930s, bond-issuing mortgage banks with preference for income-generating rental objects did not successfully arise in the US. "Mortgage securitization appeared in six different forms between 1870 and 1940, and each time the market for mortgage-backed securities grew rapidly for a few short years and then collapsed" for largely two reasons (Snowden 1995b:262): first, only unstable *private* mortgage banks without state-support structure arose and secondly, financial regulation preventing defaults and over-lending crises remained absent (ibid. 275). "The major problem was the informational asymmetry between bondholders and lenders. Many mortgage banks exploited their informational advantage by placing high-risk, high-interest loans behind the bonds" (Lea 1996:158).

Most of the attempts prior to the 1930s concerned farm mortgages in times of new settlement in the 1880s, of production extensions such as WWI or farmers' indebtedness problems in the 1920s (Snowden 2007). The first *national* securitization system, instituted by the Farm Loan Act of 1916, deserves mention as it anticipated the latter *urban* mortgage securitization for the case of farm mortgages (Prasad 2012:199). The Act created a Federal Reserve of land banks that relieved commercial banks of problematic farm mortgages and guaranteed for new loans corresponding to standardization requirements. When the realtors and the BLAs lobbied for a national mortgage securitization system after WWI for the first time, the Farm Loan Act served as their guiding example. As a second pillar of the Act, it allowed for voluntary local credit cooperatives that would mutually guarantee for their issued mortgage bonds, a system reminiscent of the German *Landschaften* but adapted to the American context. The century-old institutional heritage of modern German mortgage banks like the 18th-*Landschaften*, however, was lacking in colonial America. Imposed as a compulsory credit cooperative from above on often noble landlords, tied by local solidarity, it was neither compatible with the transatlantic

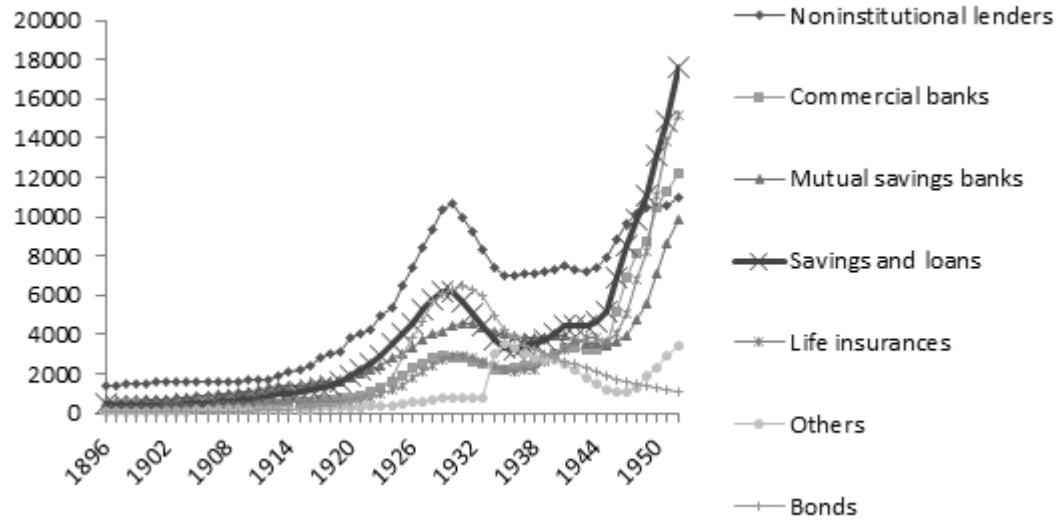
reserve against strong governmental measures nor with the absence of a locally bound elite in a young society of small settlers (Frederiksen 1894b:60). Thus, these cooperative-banks for agricultural purposes could not figure as example, as they did in Germany, for the development of urban-real-estate focused mortgage banks in the 19th-century. More generally, one observes that the development of modern urban mortgage institutions apparently hinges upon precursors of rural mortgage models which passed on the centralized, bond-issuing model to urban Germany and the government-created standardized and guaranteed secondary mortgage market model to urban America.[37]

A final mortgage-bond type prior to the 1930s emerged in the 1920s and fueled the apartment-house overproduction that ultimately led to its demise (Radford 1996:13f). "The timing of the rental housing boom [in 1926-1929] was greatly influenced by the growing popularity of mortgage bonds in the financing of rental housing [...]" (Grebler 1950:132). During that period, this new mode of financing led to the highest shares of multi-family units in new constructions, up to 54% of all units, occurring mostly in larger apartment projects, often in NYC (Baar 1989:111). In peak times, mortgage bonds reached a several billion dollar volume of which roughly 50% went into apartments and apartment hotels, the remainder fueling business constructions (White 2009; Goetzmann/Newman 2010). Historically, the bond-issuing institutions, mediating between the building companies in larger cities and private investors, went back to the 1904 NY state legalization of private mortgage insurance business as the default-risklessness is a precondition of successful bond-securitization; lax supervision, over-lending and the apartment over-construction then led to the practical disappearance of this industry after the 1929-crash.[38] Note the rise and fall of the bond-curve in the following chart and the rise to dominance of the SLAs and thrift-institutions more generally:

[37] A more systematic investigation of the spill-overs of different traditionally *rural* economic and welfare institutions into the urban sphere across countries would be promising.

[38] This rise and fall being paralleled by the market for commercial-skyscraper financing bonds issued by bond houses (Willis 1995:162).

Figure 15: Residential non-farm outstanding mortgage in million dollars



Source: (Snowden 2006a)

The general absence of mortgage-bonds in the US prior to government intervention also reflects the generally prevailing regionalization of mortgage markets and the low degree of interregional lending of even non-securitized mortgages. Savings banks and the BLAs as principal traditional urban mortgage lenders next to the non-bank personal networks were restricted to regional and state lending by law, in cases of ethnic BLAs to the neighborhoods by fact; their concentration of risk was compensated by a precise knowledge of local conditions and lenders and better monitoring mechanisms (Snowden 1995a:218). The one exception to this rule of localism in mortgage lending were life insurance companies which successfully managed to monitor local loan agents and enforce defaulting mortgages quickly, thus holding 60% of their assets in mortgages, sometimes up to 10% directly in real estate, even if they gradually reduced their share to below 15% in the 20th-century in favor of more alternative railroad and government bond investments (Saulnier 1950:12). Even if they held a high *number* of home-mortgages (up to 90% in the earlier 20th-century), their investments in dollar-volumes were much directed towards income-producing residential and commercial mortgages (45% in 1946) (ibid. 49), known for long-term amortizing loans with high LTV-ratios.

The missing alternative: non-profit housing associations

Finally, though not entirely absent on the American continent, non-profit housing associations in philanthropic or cooperative form remained limited and outside of government's purview until the 1930s, when New Deal policymakers noticed the absence of adequate non-profit housing subsidy addressees.

The major center for limited dividend companies and cooperatives was the northeast, especially New York, where the first philanthropic housing associations constructed moderate-income housing in the late 19th-century (Siegler/Levy 1987). In 1876, the first housing cooperative was founded as an apartment-house cooperative where the legal form, however, was used by upper-classes for living in jointly managed apartment houses. The first cooperative in the European sense, where not only purchase of material and construction of houses is made a joint endeavor but also the management of the constructed units, did not arise prior to 1916, when Scandinavian immigrants imported the cooperative idea from their homelands to NYC (Karin 1947). In these cooperatives, the individuals only held shares in the amount of their occupied housing unit, whereas the cooperative itself held the title over the entire property, which often included common amenities beyond the individual units. This cooperative form which still makes up a considerable part of the Scandinavian housing stock in Europe is even closer to private homeownership than continental cooperative forms, where the cooperative does not require the purchase of shares equaling the sales price and where it figures more like a non-profit landlord, through its mere size alone. Yet, in spite of the closeness of American cooperatives to private homeownership, this associational form did not gain much ground as potential competitor of SLAs. "The United States Bureau of Labor Statistics discovered only forty cooperative housing societies in existence during the mid-1920s. All but two of these were in New York City", i.e. mostly apartment-houses inhabited by Scandinavian immigrants (Lubove 1963:69).

A first reason for this absence certainly lies in the less rapid and different development of the cooperative movement in the US more generally. Whereas today the American cooperative economy appears to be larger and with stronger member-base than in old European countries such as Germany (Battilani/Schröter 2012), the movement's form and beginnings were quite different. Whereas in Europe countries developed especially consumption, credit, some production and then housing cooperatives, these manifestations remained rather rare in 19th-century America, while the various popular farmer movements were the most fertile ground, where purchase-, production- and sales-cooperatives prevailed (Horsthemke 1998). The often cited "nation of joiners", referring to the high association rates in the US, mentioned by Tocqueville, Schlesinger or Putnam, traditionally took rather the form of (quasi-)religious clubs and movements than the joint form of doing business (Skocpol/Ganz/Munson 2000). The reasons for this systematic difference are complex, but probably have to do with the prevalent private business solutions and the aversion against too much philanthropy-from-above being at the origin of many cooperative institutions. In Germany, the first non-profit housing association in Berlin was under the sponsorship of the Prussian Emperor and the tsar. In fact, many of the

reasons explaining the restricted development of socialism in the US might equally be behind the low-level of this other alternative economy model, i.e. cooperatives. Cooperative ideas and realizations were certainly not absent in the US and especially the northeast witnessed the rise of Raiffeisen-inspired credit unions, consumption and eventually housing cooperatives. The early socialist ideas of Owen, Fourier or others had even motivated the foundation of from-the-scratch utopian towns whose survival rate was however very low (Benevolo [1968] 1971). But especially the late-born American housing cooperatives lacked the permanent support of reformers (1), labor (2) and eventually the government (3) to be able to live up to their German equivalents.

1) Different reformer views

Prior to the second generation of housing reformers involving Catherine Bauer, Edith Wood or Lawrence Stein from the 1920s onwards, American turn-of-the-century reformers did not make non-profit housing support a real alternative model to the private tenement evils that were at the origin of much reformer-activity (Daunton 1990:257). Writing with hindsight, Bauer notes that a real housing movement comparable to the European ones had been traditionally absent in the United States (Bauer [1934] 1974). Early American housing reformers were certainly aware of European tendencies, where overcrowding, congestion and slum problems had a longer history. Transatlantic travel of city-planners and housing reformers prior to WWI and anew in the Weimar settlement years went often in the European and especially German direction (Rogers 1998). American housing reformers can broadly be categorized into the suburban-family-retreat defenders, the model housers, the settlement movement, the tenement commissioners and the *City-Beautiful* movement. While the absence of non-profit rental housing of decent standards can be considered their negative common denominator, I briefly turn to the differing positive objectives of each reform group.

A loose group of writers, architects and feminists proposed the conservative, suburban-retreat ideal of single-family cottages that would bring the non-American immigrants living in the immoral tenements in line with American standard (Fishman 1987:121). The line of thought presupposed the rise of the suburban single-family home as housing ideal for the middle-classes between the Gilded Age and the 1920s that reformers proposed to extend to the lower-classes. The rise of this ideal is not only interesting because it shows that American housing reformers were inclined to give up rather than reform central-city tenement housing. It also marks a strong counterpoint to the idea that the middle-class suburban park-neighborhood detached single-family home has *always* been the cultural factor behind American homeownership. In fact, throughout most of 19th-century urbanizing America, middle-class

tenancy became a common phenomenon, urban HRs fell below 20% in some cities and this revelation by the 1890s' Census triggered public discussion about the decadence of American homeownership. Comparing these tendencies to countries like Germany, a contemporary observer remarks: "Is it not startling that in the greatest republic on earth, whose free institutions and free homes have been its boast for a hundred years, the percentage of its dependent [on landlords and mortgagees] population should be greater than even in the monarchies of Europe!" (Collins 1895:64).

The origins of the suburban-home idea can be traced to the ante-bellum period as a conservative and also religiously inspired response to early signs of industrialization (Clark 1986). In times of the Great Awakening, the recollection of the family in a private home in natural surrounding appeared as ideal in the writings of Andrew Jackson Downing and Calvert Vaux. The first "Treatise on Domestic Economy", published by Harriet Stowe, appeared and began to make household matters an object of public attention. Most important were also the works of the Central-Park architect Frederick Olmsted, who applied the park- and cemetery romantic landscaping ideals to the arrangement of residential suburbs, which his sons then made a profitable business (Reps 1965:339). The majority of builders or self-builders could not employ architects, of course, and relied on plan-books which promulgated the newest suburban ideals for home construction (Clark 1976).

The turn to wider middle-class homeownership has been variously located as beginning between the 1870s and 1890s and occurred under specific furthering conditions. The new immigration and increasing strike activity during that period made the cities a growingly hostile environment for the middle-classes which has been interpreted as a retreat to more intensive family life against the industrial city (Sennett 1970:187). In southern cities, which remained out of the immigrant focus during the period, witnessed the incipient white flight to suburban areas and neighborhood segregation by race, where before relatively mixed streets with separated lives had existed (Lands 2009). Whereas in continental Europe the middle-classes accommodated themselves in existing rental buildings or reappropriated inner cities through large-scale new construction where strong expropriation rights allowed so (Wagenaar 1992), the American middle-class already at that time took a different course (Blumin 1989:275). In the course of the "domestic revolution," middle-class women could actively embrace housework without loss of status, supported by new technical equipment, whereas the institution of domestic service began to decline, both enabling more spending for housing and inciting to move to smaller places (Strasser 1982; Katzman 1978). Indeed, the average size of houses prior to WWI decreased and suburban housing was gradually entered by professional subdivision speculators operating on a larger-scale, using the spreading streetcar for suburb

developments (Garb 2005; Weiss 1987; Doucet/Weaver 1985:583f). Together with these promoting professions, both the realtors and the BLAs began to organize up to the national level and coordinated advertisement campaigns in favor of homeownership, often with quasi-religious zeal (Mason 2004:23ff).

As distinct reformer group, the NYC-, Cincinnati- and Boston-based reformers, in turn, developed philanthropic model housing and stricter tenement building codes as alternative ideas. Private real estate should thus be shown a building example through five to six per cent dividend model tenement, whose minimal features were to be enshrined in the city's building code. Dr. Bowditch, for instance, founded the Boston Cooperative Building Company in 1871 promising a 7%-philanthropy-dividend to his investors (Lubove 1962:34). The approach often stumbled upon the problem that profit-making even on the model houses was not given up implying that a poorer clientele could only be built for given the land and interest costs by crowding more tenants together within the same space. Not surprisingly, a generation of so-called model tenements, especially the notorious, yet at first price-winning dumbbell tenement type of 1879 with windowless rooms, hardly fulfilled their role of guiding example.

The building regulation approach, in turn, motivated by hygienic and social-control concerns through reformers such as Lawrence Veiller, was able to protect the new housing construction from the worst aberrations but relied otherwise also on the private real estate offer. Suggestions towards municipal land grants to lower-income housing companies in these reformer camps often failed due to lacking municipal involvement in the land market (Lubove 1962:105). Moreover, while certainly opting for bettering the lot of tenement residents already in place, their eventual ideal remained the decentral cottage settlement for raising the lower- to the middle-classes (Fairbanks 1988:33).

As further reformer group, the Chicago Hull House and successive other reformers were known for an American replica of the British Octavia-Hill system, also known as the American settlement movement. It mainly consisted of well-to-do young women, who lived in lower-income communities to instill American morals in the mostly immigrant population. They either negotiated with landlords to act as paternalist intermediary for the regular collection of weekly rents – a visit usually connected with the inspection of proper hygiene and morals of the tenants and their accommodation. Or they even directly replaced the landlords and cultivated model tenements including community services. Overall, however, the settlement movement rather sought sanitary and moral education for tenants with rent payment problems instead of suggesting an entirely different housing provision system (Lubove 1962:107f), even though it became an important spring for the later New-Deal housing legislation (Münnich 2010:300).

An ultimate reformer idea that did take European cities as example and probably had the most widespread impact was the *City Beautiful* movement that emerged out of planning the 1893 World's Columbian Exhibition in Chicago. It sought to integrate some of the absolutist-city elements in American city-planning such as symmetrically and diagonally laid out streets, parks and representative squares and buildings for the city-center. Representative high-standard tenement buildings, however, were not part of the approach, which generally focused more on city-planning leaving out housing concerns, such as in Burnham's plan for Chicago (Sutcliffe 1981:98,108). Its realizations might have rather aggravated urban housing situations and accelerated the replacement of housing through central business district units.

The upshot of this brief portrait of American reform is that whereas European reformers often aimed at extending decent middle-class renting to the working-classes, American reformers usually rejected it right away. Commenting on the 1920s Weimar settlements, the Europe-inspired American reformer of the New Deal era, Catherine Bauer, remarked:

"On the Continent, however, and particularly in Germany, the apartment-house has undergone such a complete change from the nineteenth-century *Mietkaserne* that the blanket distinction between a good one-family house and a less good flat does not really hold any longer. For many types of family, the better services provided by a good modern apartment-building may make it more desirable" (Bauer [1934] 1974:191)

In the US, reformer alternatives rather pointed to making suburban homes more feasible than flat-living more decent for the working-classes. When reformers of the European type around Edith Elmer Wood, Catherine Bauer and generally the members of the Regional Planning Association of America (RPAA) did emerge around WWI, they could not count on equal support on the municipal, state and federal level (von Saldern 1997:81). The suggested creation of all these institutions, from national housing banks to municipal land banks in Wood's law proposition of 1913 reveal this institutional void (Lubove 1963:27). Around WWI, some state legislatures had tried to pass land grant laws to house urban workers on small suburban lots, inspired by back-to-the-land ideas, but with hardly countable results (Brown 2011:6). After WWI, the US "lacked any governmental machinery to compensate for the collapse of the private building industry, which had assumed exclusive responsibility for satisfying the nation's housing needs" (Lubove 1963:18).

2) Uncooperative labor movement

While reformers did not adhere to the idea of non-profit housing subsidies in favor of the lower-income classes, the mainstream American labor movement could equally not be counted on in this respect. In European countries, cooperative movements and especially the labor movement collaborated with the housing cooperatives as financial sponsors, organizers, member-spill-overs or even direct construction work. Socialism and labor movements were of

course not entirely absent in the United States, especially not prior to WWI. Indeed, the American socialist party was much in favor of social municipalism as practiced in Europe. But it was certainly weaker and less well organized than the German one and especially the surviving and politically relevant elements had different political attitudes, often outright pro-capitalist. Private ownership of land has never fundamentally been challenged in the United States and the critique of large land monopolies and effortless land gains considered as illegitimate did not lead to effective demands of municipal or state ownership of land or other market-alternative kinds of distributions, like in Germany or the UK (Daunton 2007). Rather, the dominant reaction was to put restrictions on monopolistic speculators in favor of a more equal distribution of land to make everyone participant in the market and protect the gained shares. Even Eugene Debs of the Socialist Party proposed more small land ownership against the big corporations (Fitrakis 1990:24). These ideas, taken up in the first Land Ordinance from 1785, the Homestead Act of 1862 and the 1920s Zoning Ordinances, were repeatedly defended, first in relation to agrarian land for farmers, then in the second half of the 19th century also for urban land for industrial workers, while farmer groups and labor unions were often sympathetic for their respective concerns and used a similar vocabulary. Thus one finds the demand for a free distribution of land to the people already in the preamble of the Knights of Labor program from 1878, whose strong Irish and Catholic constituency fighting for Irish land reform at the time certainly furthered this cause (Schratz 2011:30).

But also the American Federation of Labor (AFL) was in favor of homeownership and better housing for unionized workers from the beginning. In the proceedings of the AFL annual convention in 1919 one reads:

> "Legislation should be enacted placing a graduated tax upon all usable lands above the acreage which is cultivated by the owner. This should include provisions through which the tenant farmer, or others, may purchase land upon the lowest rate of interest and most favorable terms consistent with safety, and so safeguarded by governmental supervision and regulation as to give the fullest and freest opportunity for the development of land-owning agriculturists. Special assistance should be given in the direction of allotments of lands and the establishment of homes on the public domain. [...] The ownership of homes, free from the grasp of exploitative and speculative interests, will make for more efficient workers, more contented families, and better citizens. The government should, therefore, inaugurate a plan to build model homes and establish a system of credits whereby the workers may borrow money at a low rate of interest and under favorable terms to build their own homes" (AFL 1919:76, 97).

This statement evidently contrasts strongly with the views found in the German labor movement above. Though sometimes the demand for municipalization of services came up, union cooperative housing did not become an option for the AFL before WWI (Lubove 1962:237). Several reasons can account for this absence:

1) One reason, also cited in the debate about the absence or fall of socialism in the United States is the exceptional culture of the American frontier that provided easy access to property (Turner [1893] 1920; Foner 1984:60; Lipset/Marks 2000:24; Harris/Hamnett 1987). Many

European immigrants of rural background were discriminated on the feudally fettered land markets and yearned for farms of their own. Immigrant commissioners in the south were aware of the fact that without the provision of land they would not attract German immigrants, for instance, of which 90% expected to become landowner (Schöberl 1990:171). The frontier, however, should not be overemphasized in the relevance for homeownership as real estate was very unequally distributed in the early frontier cities (Burley 1988) and lower general wealth and high mobility left initial western HRs below their eastern counterparts.

It is worthwhile to insert a brief digression about the homeownership fate of German immigrants at that time because it constitutes a remarkably telling natural experiment favoring my urban production regime thesis against preference-based explanations of the US-German homeownership gap. Between 1820 and 1914 about five million Germans, 19,6% of all immigrants or 82% of all German emigrants, moved to the US with peaks after 1848, 1865 and the 1880s (Marschalck 1973:48). Much evidence confirms that the urban HRs of foreign-born exceeded the natives' ones prior to the 1920s and that, among the foreign-born, Germans had among the highest HRs, even exceeding the Irish one (Eberstadt [1909] 1920:650). "Of all the nationalities considered, the largest proportion of owners shown in 1900 is 58.1 per cent for persons of Scandinavian parentage, as contrasted with 52.9 per cent for white persons of native (United States) parentage, and 51 per cent for those of German parentage" (US-Census 1902: ccxiv). A similar ranking applies to 1890, when German non-farm HRs exceed the native ones; this tendency was especially noticeable in communities with high German immigration such as Milwaukee (Simon 1996). As Germans settled quite evenly across urban and rural areas, settlement structure cannot account for this difference (Wust/Moos 1983:75). Germans, as most immigrants, settled even in disproportionately high numbers in rather urban regions, when compared to the natives (Glaab/Brown 1967:138). Yet, even in the worst Chicago tenement slums of 1907, where the 16,3% HR was only half of Chicago's, 46,1% of the German foreign-born owned their property (Abbott 1936:367). It is, of course, true that each of the three major immigration waves was composed of selective groups, moreover selective with regard to their relation to homeownership: southwest German craftsmen and peasants left with too little land due to partible inheritance, Prussian peasants fleeing late-feudal land-restrictions, urban industrial workers fled insecure economic conditions, while US-state agencies and private developers openly made publicity for cheap land (Marschalck 1973:51). At the same time, the natural experiment setting is not entirely dismissible because these selective groups often constituted the very same recruitment base for intra-German migration to industrial urban centers. Thus, the fact that migrants with similar preferences became urban tenants in one place

and exurban small-scale homeowners in the other further seems to underline that it was the urban production regime which made the difference.

This point can be further supported by a brief comparison of company housing in the United States and Germany which amounted to about two million people in the US at its peak in 1930 (Crawford 1995:2). Germany was roughly at an equal per capita level with 140.049 and 466.434 employers housing *units* in 1898 and 1937, respectively (Schulz 1985); the comparison is only a coarse one as companies also incited much construction not of their own, had already sold housing units, paid rents to private landlords, etc. The numbers, however, seem to suggest that claiming a private employer-based welfare substitute concerning social housing in the US, as claimed for health and pension welfare (Hacker 2002), would stumble upon problems. Housing welfare in the US does not seem to have been more company-based in the US than in Germany, following these numbers. The majority of company housing in both countries can be found in first-industrialization companies with non-urban production sites, especially mining, metallurgy and railroads, where companies often replaced urban planning functions in lack of existing municipalities (Honhart 1990). The resulting company towns often shared similar features, which, of course, should not underestimate further differences in design or architecture across time and space: dispersed settlement, low-rise cottage-like housing structures often in settlement structure, often paternalistically motivated employers' incitation to owner-occupation to a certain degree and increasing social conflict about the non-separation of employer- and landlord-function of companies, which used to tie rental to employment contracts, to subtract rent directly from wages or to pressure workers through their mortgage obligations.

The high number of small-rise houses eventually led to higher rates of homeownership in these regions in spite of their current structural problems – as still witnessed in the north of France or the Saarland – once sitting tenants bought their homes and companies retired from real estate. The similar features are a result of the lack of prior institutions present, the large possessions of accessible real estate of the companies and the necessary construction material and human resources, their need to attract and keep workers in deserted regions, the often rural background of the workforce acquainted with cottage-type buildings, regular income-securing rent or installment payments etc. (Heinrich 1970; Frouard 2008). These quite comparable conditions with comparable results with respect to building type and tenure form make plausible that less national housing preferences than the socio-economic supply conditions created long-term differences in these towns across countries.

2) A second reason for American labor's affinity to homeownership and indifference towards non-profit housing lies in the factual housing conditions. Urban historians generally report

higher HRs for workers than for the middle classes before 1900, when cities were still less segregated and the middle class had not yet made the form of tenure a status norm (Zunz 1982; Simon 1996; Garb 2005). These studies suggest that one motive behind this astonishing fact was workers' search for economic security against business cycles like the depression in the 1870s. Through BLAs and complicated networks of personal credit, workers even bought more than one housing unit to supplement their salary by (sub-)letting them in the neighborhood (Garb 2005:50ff). In fact, the most frequent reason for defaulting mortgages at the time were the inability to serve the mortgage due to sickness (ibid. 104). This suggests that security-investment in homes came at the expense of other types of social securities such as health funds as in British friendly societies (Daunton 2007) or else the compulsory industrial-accident insurance in France and Germany, whose equivalent lacked in the US (Skocpol/Ikenberry 1983:108ff; Rabinbach 1996:55). Irish immigrants, for instance, are reported to have undergone extreme under-consumption in order to live in their own home, up to the point of not investing into their children's education (Thernstrom 1966). For black workers also, the beginning Great Migration meant a catch-up process in terms of HRs; today's racial gap between white and non-white HRs of roughly 20 percentage points was closed by 25 percentage points before 1910, but only by 1 point afterwards (Collins/Margo 2011:5).

3) A third reason for labor's adherence to the homeownership ideal might lie in its association with populist farmer groups. Contrary to Germany, industrialism aroused various movements of small farmers such as the Grant or the Populist movement that served as example to the labor movement, kept ideas of egalitarian land ownership alive and served as basis for fraternization against common enemies such as big monopolies, regressive taxes and tight monetary policy (Hays 1957:28f; Prasad 2012:125ff). Workers were at the basis of George Henry Evans' National Reform Association that fought for the homestead exemption (from seizure) from 1844 until the Free Soil movement and the Republican Party took over the issue (Bronstein 1999:16ff). From the 1880s onwards, American unions showed solidarity with the Irish Land League, a link that was also established via Henry George whose "Poverty and Progress" established him as a leader of the single-tax movement. This link was fastened by the nomination of George as the mayor's candidate by the socialist party in NYC who, however, went back in the direction of land reform after the lost election (Scobey 1984:314). The AFL also supported the candidacy of the agrarian candidate William Jennings Bryan in the 1890s and free land ownership was a shared goal of agrarians and urban labor (Hays 1957:82).

4) Finally, the smaller housing type of cottages, two-story tenements or even three-deckers, implied less necessary minimum capital if one wanted to invest capital in housing than was necessary in case of indivisible German tenement houses of at least half a dozen housing units.

The high HR among American workers was also possible because these smaller housing forms allowed them to buy a tenement with the intent to pay off the mortgage with supplementary income coming from renting other parts of the building, often only single rooms, a system corresponding to being a main tenant including boarders as subtenants to rent apartments offered with several rooms (Harris 1989). Renting along with child's and woman's labor, overcrowding one's family in a single room were strategies through which American workers sought to access homeownership, all strategies that clashed with reformers' attempts to impose a middle-class family lifestyle on workers (Cohen 1980). The same mistrust towards banks that attracted workers to local-neighborhood BLAs also pushed them to invest their savings into homeownership as the less riskier asset (Abbott 1936:384; Lewinnek 2006). Boarding, the inclusion of non-biological members in a wider household economy, had been a widespread phenomenon concerning 20% of all households up to the late nineteenth-century, often serving as private rental equivalent for young people before their economic independence, including the native middle-class (Modell/Hareven 1973). By 1880, however, reformers had gradually established the closed family as the residential ideal and boarding rather became an extra-income strategy of the urban working-class, still concerning 15-20% of all big-city household in 1920, but declining to 9% in 1940 (ibid. 469). In spite of these additional incomes that also included the housewives' and children's labor, workers still had to undergo often considerable under-consumption to save for the next lump sum payment; as houses were often not situated in the most attractive districts, from an investment point of view, housing was also not the most rational choice for workers to save their money (Luria 1976). Reformers were surprised to find many immigrant workers coinciding with their objective to make immigrants homeowners though they hardly appreciated the many un-American means to achieve this goal (Cohen 1980:762). These means which often involved considerable hardships also do suggest that workers chose the homeownership option not necessarily for the civilizing reformer motives but rather due to constraints concerning the local institutional and supply structure.

For all these reasons – traditional higher HRs among workers, proximity to land reform ideas, economic security reason and more accessible building form – American workers tended to favor homeownership solutions to housing and were less likely to form a non-profit housing association network that the government could have given subsidies to.

3) Lacking governmental support

Not only were neither reformers nor the labor movement strong proponents of a housing solution involving cooperative or other non-profit housing, the various levels of government prior to their housing policy intervention proper largely abstained from initiating or supporting

this kind of housing provision. American municipalities lacked the tradition of municipal land-banking which would have helped cooperatives to receive implicit subsidies through land provisions and would have solved their location problem given the ever more excluding neighborhoods. Municipal housing provision lay even farther beyond American cities' possible competences. The federal government, though subsidizing homesteads, railroads and farming through cheap land sales, remained equally absent from subsidizing non-profit housing associations with land grants. The lacking public insurance system whose money could have been used for non-profit purposes including low-income rental housing made a crucial difference here, making it plausible to speak of a private-homeownership/public-welfare trade-off even a century before the time it was first mentioned for.

Due to lacking support of reformers, labor and the government, therefore, a wider non-profit housing movement did not arise in the US, while specialized housing saving institutions did. Once the BLAs in place, they constituted also an essential element of a private real estate lobby that prevented any attribution of government money to competing institutions, showing the importance of the timing with which these institutions saw the day in the different countries. The BLAs emerged especially in the northern and middle-west regions that were not yet covered by the south-dominating life insurances, the west-dominating commercial banks and the northeast-dominating savings banks; as commercial banks mainly served the merchant-class segment with short-term credit, the BLAs could easily move westward in the course of economic expansion (Morton 1956:41ff). But no established network of savings and mutual banks such as in Germany prevented this institution from rising; neither did a strong non-profit housing movement, both factors that retarded the *Bausparkassen* in Germany. At the same time, institutional investors such as life insurances, through collaboration with local loan agencies, provided also substantial credit for single-family houses, besides their investments in income-generating, i.e. commercial and then the apartment-house properties (Saulnier 1950). But no large-scale mortgage institution of the German mortgage bank type arose that, once established, could have pushed for more multi-unit structure investments.

1.3 Traditional construction industry

The influence of particularities of the construction sector on the different American homeownership development is twofold. First, much like the limited municipal grasp on newly constructed housing units or the limited circulation of capital via banks, the 19th-century construction sector was paralleled by non-market self-provision of housing in which construction professionals did not play an active role. The self-building was much favored by the availability of timber as construction material with its easier transportability, malleability

and use in prefabricated form. Secondly, in the otherwise large speculative housing provision circuit, there were tendencies towards non-craft-based provisions of housing units: building companies grew to respectable size producing on a large scale, the use of prefabricated parts allowed for a reduction of labor-intensive on-site production and allowed for a circumvention of traditional building trade monopolies. These latter had emerged in the form of local unions that controlled urban construction labor markets through their hiring hall and skill monopolies.

Although the US did not have an equally strong and formally entrenched institution of craftsmanship as in Europe, its basic institutional features were well developed in the 18th-century: masters self-regulated the individual trades, controlled for quality, prices and the vocational training of journeymen. Especially in the newer and sparse settlements, however, the low demand did not allow for the establishment of a trade division of labor (Hansen 1997:42ff). "American mechanics broadly lacked the parapublic associations, legal identity, state promotion, and other forms of public and private governance that gave the German handicrafts a distinct identity and a modicum of order even during the most liberal phases of nineteenth century reform" (ibid. 85). In comparison with Germany, therefore, the market liberalization movement in the building trades did not stumble upon strong resistance and once the demand for housing units soared, no regulation could hold back the uncontrolled establishment of new building companies. After the American Revolution, the traditional trade system was thus gradually challenged by speculative builders, often coming from outside the trades and subcontracting the former master builders for their purposes (Gilje 1995:xiv); journeymen could either try to become builders themselves or, more frequently, were assimilated to wage laborers who began to organize in building trade unions (Christie 1956:21). Instead of one master building a small number of houses every year with his family firm during the summers, manually prefabricating individual parts in the winters, masters often turned into speculative building in ante-bellum America, gradually taking over the entire professional real estate construction market in the 19th-century, with the exception of self-building. While immigrants often brought along a level of skills from their home countries, the former master-based reproduction of skills was slowly eroded and pure on-the-job learning, especially in times of fast city expansion in NYC, led to sometimes unsound constructions and collapsing buildings (Day 1999:44).

In the later 19th-century, with organizations of small masters and any kind of conservative *Mittelstandspolitik* lacking in the US, the successful establishment of trade-based unions, opposing the weakly organized contractors, dominated urban construction. Unions emerged as local labor monopolies, turning entire cities into closed-shops, i.e. controlling the job offer through own apprentices, the job allocation through the hiring hall and wages through

asymmetric negotiations with weak contractors. The 17 main building trades also emerged as most dominant sector in the pre-WWI AFL. The local monopolies were often maintained through the conservation of old municipal building codes and, in cases of new labor-saving technology, through the exclusion of these companies from supply circuits or union-takeover of their workforce (Haber 1930:83). Thus by 1912, the United Brotherhood of Carpenters and Joiners extended their sphere of influence to all wood workers including upstream saw mills in successful jurisdictional fights against the union of wood workers (Christie 1956:85ff).

One could presume that unions were thus able to serve as functional equivalent of the German artisanal vocational training system guaranteeing quality production in residential building. Yet, prior to the 1920s, there was no established system of vocational training schools; joint collaboration of local unions and employers often failed due to lacking financing consensus and due to contractors' organization weaknesses (Haber 1930:132ff); an 1880s' attempt of the National Association of Builders to set up Trade Schools to replace the dominant learning-by-doing system failed as well as attempts of joint arbitration boards in the 1900s. Also, the deep trenches between trade unions of different jurisdictions without organization by the industrial principle made coordination more difficult.

Moreover, residential building in the one-to-four-family home sector has been traditionally a world apart within the construction sector. First, in comparison to larger multi-family and office building, i.e. the beginning skyscrapers in the 1890s, the residential sector has required much more unskilled or lower-skilled labor and traditionally unionization rates have been much lower (Mills 1972:14). Secondly, the average firm size in the sector is smaller, with more turnover among firms, making a union control more difficult. Finally, more particular for the US, wood became the main construction material next to bricks in the 19th-century for the low-rise residential construction sector and, without embracing strong geographic determinism, it is fair to assume an influence of wooden construction with less skill requirements, more possibility for prefabrication and for self-building than for any other material. American cities sojourned much more briefly in the stage of tenement stone or brick cities, following the wood-age and being followed by skyscrapers and apartment-houses, with vertical building restrictions almost unknown (Lichtenberger 2002:92). What regards suburban constructions, however, the wood-age was hardly abandoned.

Geographic determinism concerning economic phenomena is known as the thesis that features of the natural environment are the only relevant factor explaining differences in economic outcomes (cf. Landes 1999:21ff). Applied to the building and homeownership sector, one could be inclined to argue that the abundant availability of both land and wood made owner-occupied housing units considerably cheaper than on the deforested European continent. The explanation

has already been used for the early US-export regime and even for the entire technical culture that characterizes various industries (Christensen 1981; Radkau [1998] 2008:53f). But abundant wood and land are apparently neither necessary nor sufficient to explain high HRs in countries – see, respectively, the deforested Mediterranean high-homeownership countries and the resource-rich Sweden of tenants.[39] This, of course, does not need to entirely dismiss these geographic factors, but points to including them in a more complex explanation for the fact that already in the 19th-century, as German cities became ever more petrified and dense in spite of growth, American cities spread detached wooden suburban houses over ever more land.

Wood as a construction material as compared to brick or stone is associated with lower-rise buildings as higher stories reach faster stability limits (Finkel 1997:12). Its most characteristic property, however, is the better suitability for prefabrication and fast construction, allowing for easier relocation of structures and better transportability without loss of durability or stability. Large parts of the Northeast, Middle West and West were covered with forests at the century's beginning and deforested at its close (Rome 1994). Wood was considered a public good like water and air and throughout the first half of the 19th-century there were recurrent conflicts between authorities and lumbermen clearing forests on still national land; de facto, there was little effective enforcement and the Timber Culture Act of 1873 paralleled the Homestead Act in distributing 160-acres pieces of public forest lands to individual settlers (Dick 1970:180ff).

While traditionally carpenters were the craftsmen monopolizing wooden constructions prior to the 19th-century, the vulgarization of the balloon-frame building in the Chicago 1830s in conjunction with the mass-market for industrialized produced nails, replacing the more skill-intensive hand-carved mortise-and-tenon joints, is said to have diffused rapid construction techniques and self-building possibilities (Cronon 1991:179). Housing types of different styles were communicated through self-builder manuals. This was the technical infrastructure that fueled the large-scale and seemingly instantaneous city construction in gold-rush San Francisco or land-rush Chicago. "Even inexperienced carpenters could use it with reasonable success, and builders' manuals promoted it accordingly. By the second half of the nineteenth century, the vast majority of America's wooden buildings were using it" (Cronon 1991:179). Together with the aforementioned gridiron it became a landmark of 19th-century American cities. "By the 1840's travelers found a monotonous similarity in the appearance of American cities, particularly those that had been newly built in the West" (Glaab/Brown 1967:85).

[39] The resource-thesis gains further credence if one considers developments, similar to the US, of prefabricated individual houses in other wood-dominated but institutionally different countries such as Finland (Korvenmaa 1990) or Norway.

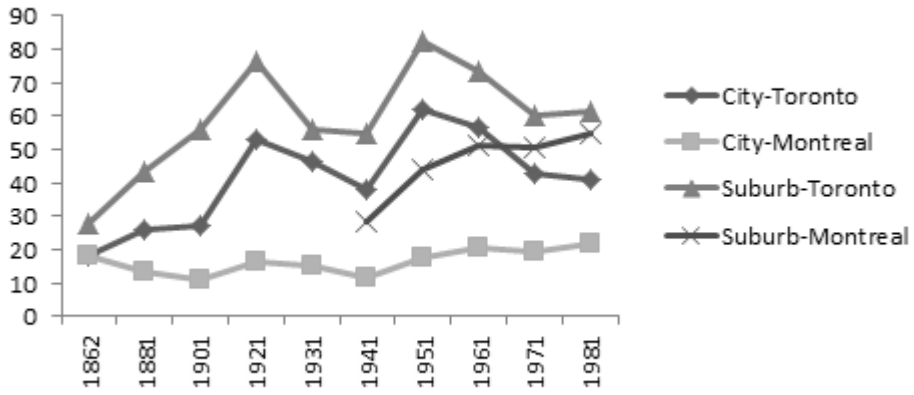
These experiences with rapid partially prefabricated construction were also enriched by the products of a British export industry of prefabricated houses and even entire public buildings such as churches that had served early settlers in the various Anglo-Saxon colonies (White 1965). Whereas the British companies were rather short-lived serving temporary colonial settlement and military markets (Herbert 1978:27), American firms soon took over and fueled much further settlement, for instance of the West coast, during the Gold Rush and the Civil War. With the rise of a denser railroad net from the 1880s onward and of the Rural Free Delivery Act in 1896, both wood and prefabricated parts produced and shipped by mail-order companies such as Sears, Roebuch and Company, founded in 1886, are estimated to have contributed 250.000 housing units to the pre-WWI stock (Kelly 1951; Hayden 2003:102f), using similar installment mortgage credit systems as used for automobiles. The increasing significance of these tendencies was also reflected in a decreasing number of carpenters, the strongest artisanal profession, in spite of increasing cities and work with wood (Doucet/Weaver 1991:56). Whereas the aforementioned United Brotherhood of Carpenters and Joiners of America achieved to preserve its jurisdiction over every wooden work, its locally negotiated wages could only suffer under the loss of necessary skills and competition through more capital-intensive production (Christie 1956:328).

On the one hand, standardized wooden construction was used by the early subdivision developers who moved from mere speculation in land to the building for sale of individual houses. The small artisan builder was successively replaced in the construction process by a general builder who contracted and subcontracted the necessary journeymen and workers. On the other hand and parallel to the professional market of wooden residential construction, simple self-building, supported by local neighborhood and family networks, is a hardly to be underestimated phenomenon prior to the development large-scale subdividers reaching down to lower ends of the market and prior to the setting of minimal standards by the federally insured mortgages. In Toronto during the 1900s, for instance, an estimated 33 to 40% of new housing units were self-built (Harris 2012:24) and in 1949, it was estimated to have still contributed 25% (18%) to the general (urban) housing stock (Maisel 1953:18). After the 19th-century city fires, much fueled by the abundant wooden houses, the design of expanded brick limits in building codes became a recurrent local policy issue as the working-classes saw themselves deprived of the right to occupy an affordable, namely wooden, residence close to the center city (Keating 1988:106).

Institutional urban differences illustrated: homeownership-Toronto vs. tenancy-Montreal

The factors determining the urban housing construction regime describe nationally shared characteristics, holding for American cities in general as compared to systematically differing German cities. The advantage of descending to the lower urban level as the explanatory one, however, allows to also probe the found factors for the explanation of intercity variations as done for the outlier-city of Bremen in Germany. The specific role of Western cities, only to be reinforced by the 20th-century westward move of population and economic power, has already been mentioned as such an application. But also between eastern cities with longer settlement history and more comparable economic conditions, differences emerged. More particularly, urban historians have repeatedly studied why Toronto and other north-American cities became homeowner cities, while Montreal became a city of tenants with HRs historically even undercutting those of NYC with its geographic particularity. The homeownership gap of the two cities arose in the 19th-century and marks the two cities until recent times, whereas the post-war suburbanization slowly assimilated the suburban HRs and thus the overall urban-area rates:

Figure 16: Time series of HRs in Toronto and Montreal



Source: (Harris/Choko 1988:72), estimates for early years

I will address this puzzling case in order to illustrate some of the arguments made above and to offer possibly new lines of explanation of the Montreal-Toronto homeownership-divide, based on the existing empirical material. It is true that today's Canadian cities show some systematic differences in comparison with US-American ones – they mostly lack the problem of racial segregation, maintained urban transit at the cost of less expressways, they incorporated suburbs, remained compacter and pushed suburbanization to greater extents (Goldberg/Mercer 1986). Most of these differences are only supported for the post-WWII period, a time when the Montreal-Toronto homeownership-gap was already established and began to decline. Moreover,

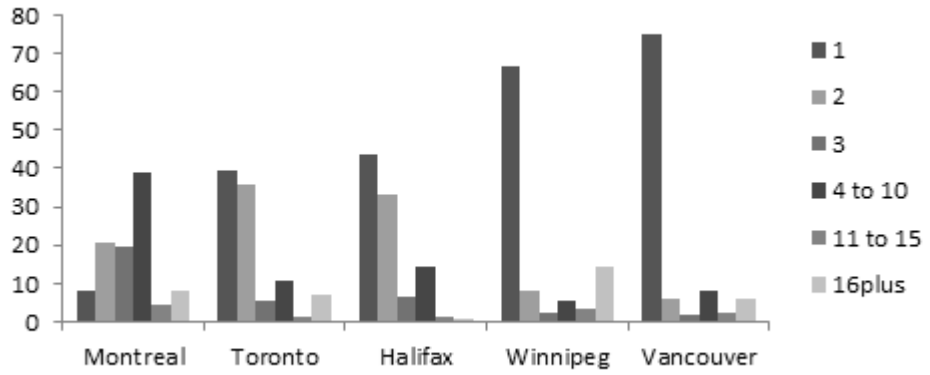
compared with German cities even the most un-American Canadian city is plainly distinguishable as North-American. For this reason and the interest taken by historians in the phenomenon, I follow the tradition of North-American-city tradition and take factors revealed in the US analysis to cross-fertilize explanations about Canadian cities (Harris/Hamnett 1987; Doucet/Weaver 1991).[40]

The intra-Canadian comparison appears especially puzzling because prima facie obvious existing explanations cannot account for the homeownership difference. Amongst them are cultural (Anglo- vs. Franco-Canadian), economic (industrialization, income, rent/house-price relations) and building-structural ones (plexes vs. single-family homes) ones (Choko 1987:11ff). The property-inclined Anglo-Canadian culture as explanatory factor has the problem to explain the higher HR in Toronto as Anglo-Canadians in Montreal show clearly lower HRs although pertaining to the upper strata (Choko 1998). The income- and relative-ownership-cost related explanations in turn have a hard time to explain the higher-than-middle-class HRs of Montreal workers and the surge of Toronto's HRs in the 1900s in spite of lower income increases.

Building-type arguments, also figuring strongly in my above-explanation, are more difficult to dismiss. It is true that from the 1970s onwards, the automatic link between building type and tenure is less automatic than it had been; also, 40% single-family houses in new construction in times of decreasing HRs before 1881 suggests their flexible use as rented units (Choko 1987:11). But at the same time it is hard to deny that at the time of strongest HR-divergence between the cities Montreal built up a significantly different housing stock associated with renting as dominant form of tenure. Already by 1891, when apartment-house construction had hardly begun (Huppé 2011), Montreal was characterized by significantly more buildings with four and more units as well as more duplexes, lower-rise houses with two units. Density of population per acre was Toronto's double. With the apartment boom past in 1941 (Choko 1994), Montreal was left with a legacy of more units in higher-rise buildings than any other comparable city in Canada.

[40] See also the conclusion for an extension of my explanation to other Englisch- and German-speaking countries.

Figure 17: Number of units per building in 1941 in percent of entire housing stock



Source: (Choko 1987:24)

The patterns of growth of the population-gaining cities, both incorporating suburbs prior to WWI, must have been channeled differently by municipalities. Montreal's stricter building codes date back to the 1850s, when repeated fires destroyed more than thousand housing units (Hertzog 1986:112). Especially the prescription of non-wooden building materials within the fire limits, extended one-to-one to the incorporated suburbs, is reflected in 74,2% brick and 13,6% stone buildings in 1891 (Choko 1987:8); Toronto, on the other hand, had 40,2% of wooden buildings. Overrun by 1900s' immigrants, it moreover tolerated thousands of self-built wooden constructions, also mail-order houses, in shacktowns on the urban fringes where municipal infrastructure could only catch up in the 1920s (Choko/Harris 1990:79). As late as 1904, a fire limit was introduced after inner-city frame buildings had burnt down (Harris 1987b:18). Adding to these municipal and building sector influences of the urban production regime comes the financial influence of Montreal's weakly developed system of organized credit which left large numbers without access to any credit institutions – only a limited number of building societies existed (Hertzog 1986:159). At the same time, only absentee bourgeois owners were able to tap personal and business relations in order to invest in rental property, while entrepreneurial speculative building trade workers constructed their duplex houses with the prospect of a financing rental income (ibid.). The absence of European-like mortgage banks corresponds well with the equal absence of high-rise tenement buildings beyond the plexes of few stories. When with the opening of the Lachine canal and the railroads, capitalism and low-wage labor made their inroads into Montreal, multi-family plexes – probably a railroad-worker housing heritage from Newcastle (Hanna 1986) – offered a flexible form of accommodation, given financial and municipal restrictions. Once the building structure was set up, it determined the offer in a way that even rising wages in Montreal could not turn around in favor of more homeownership. "Since housing is so durable a good, this limitation

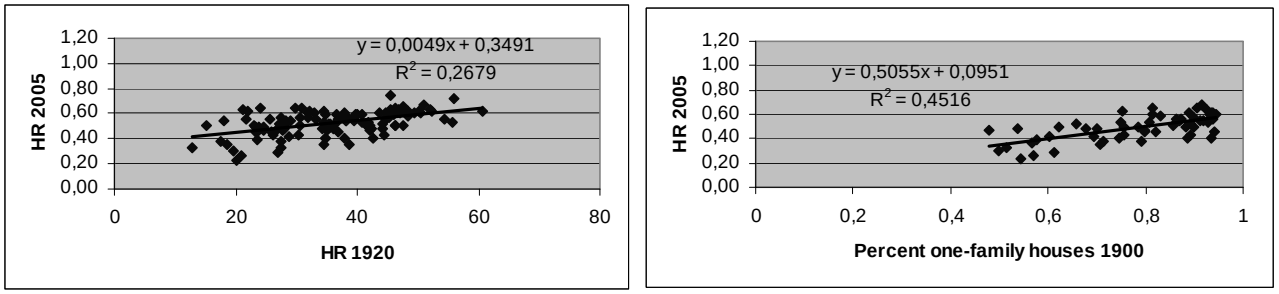
[of many rental housing units in Montreal] could be felt for decades and perhaps generations [...]. This argument appears to have some force as it helps to explain why the recent convergence in tenure levels between Montreal and Toronto has occurred most slowly in the central cities, where the inertia of the existing multi-unit stock is greatest“ (Choko/Harris 1990:87). Only the slow changes through new suburbs and condominiums – institutional layering and conversion, in more theoretical parlance – have been able to break the mechanisms rendering the once built physical structure inert. These two processes in favor of 20th-century homeownership expansion will also be found in the 20th-century legacies of *US-American* development to which I now turn.

2. 20th-century legacies

Up to this point, the reader might wonder to what extent these developments of more than a century ago can still have relevance for later homeownership developments. The path dependency argument has established the origins of both the institutional and the physical structure that set the United States on the homeownership track. All this happened before an explicit urban homeownership policy, beginning in the 1930s, saw the day. Moreover, the homeownership preference was hardly a historical constant in the United States as the foreign-born's urban HR often exceeded the natives'. The 20th-century was to witness further developments along the lines of rising thrift institutions, the mass production of single-family homes and a suburbanization movement that almost led to a dissolution of center-oriented cities. In light of these urban changes and the shorter longevity and higher turnover rate of American housing stock the focus on traditional cities almost runs the risk of losing its subject matter. On the other hand, the so-called metropolitan regions that take into account the suburban sprawl around cities within commuting range still accommodate the majority of Americans and are defined by their dominant cities. The urban heritage therefore still plays a role even if lesser so than in Germany.

If one takes a look at the American cities, which in 1900 (1920) and in the City Data Book of 2007 had more than 100.000 inhabitants, then there still is a strong positive correlation between the 1920 and the 2005 HRs and even stronger between today's HR and the 1900 percentage of single-family houses. This latter relationship seems to suggest that the more a city's structure was dominated by single-family homes in 1900, even if often rented at the time, the more probable was its fate as a city of homeowners in the subsequent century. This holds even though cities were meanwhile still growing to larger extents than was the case in Germany after its pre-WWI urbanization waves, even if incorporations from the 1920s onwards became rather scarce.

Figure 18: One-century correlations between the 2005 and 1920 HRs, the percentage of one-family houses in a sample of American cities



Source: US Census 1900, 1920, City Data Book 2007

To warrant the finding of continuity in the light of alternative explanations with the more recent cross-sectional variables commonly found in the literature I added the century-lagged historical housing variable in a multiple-regression model explaining the 2005 inter-city homeownership variation. Typical variables include socio-demographic, geographic, economic, real estate and race factors yielding the following results:

Table 6: OLS-regression (n = 55), dependent variable: Urban HRs

	Coefficient	*Std. Error*	*p-value*	
Constant	0,9782	0,1880	<0,00001	***
High rents (% >$750)	-0,0019	0,0007	0,0153	**
Population	-0,0037	0,0116	0,7496	
% households without vehicle	-0,0041	0,0018	0,0242	**
Median household income	0,0680	0,1925	0,7255	
% high-school-dropouts	-0,0026	0,0018	0,1638	
percent single households	-0,4329	0,1974	0,0338	**
% households with children under 18	-0,0059	0,0023	0,0123	**
People per square mile	0,0109	0,4362	0,9802	
Minimum temperature January	-0,0026	0,0008	0,0028	***
% 55 to 64 years	0,0517	0,0120	0,6686	
% one-family homes 1900	**0,2481**	**0,0648**	**0,0004**	*******
R^2 adjusted				**0,80**

The table reveals two important findings: the path-dependence variable, 1900's predominance of single-family houses in cities, maintains its significant positive influence on today's urban HRs, even controlled for typical explanatory factors, and it makes a considerable contribution to the overall explained variance as expressed in the adjusted R^2 increase from 58%, of the model with contemporary variables only, to 80%, where it overrides the significance of other factors. These findings make the hypothesis of relevant distant influences of historically grown building structures plausible for the American case.

One of the driving factors behind the American homeownership increases of the last decades consists in the transformation of rental into owner-occupied units through the sale to sitting or other tenants. In the United States the three short-lived moments of national rent control – the two World Wars and their aftermaths and the 1970s to a minor extent – were watershed periods during which large parts of the existing housing stock were turned over from landlords to former tenants. As this process adds one unit or household to the owner-side while simultaneously reducing the tenant-side by the same amount, these transformations have

statistically even heavier weight than the addition of one newly constructed owner-occupied unit.

Precise estimates of converted rental units are not available – estimates speak of three million units in the 1940s alone (Fetter 2013:7) –, but it is already revealing that the 1920s and especially the 1940s are known as periods of homeownership expansion as revealed in decennial Censuses. Accordingly, between 1940 and 1950, the homeownership gap leaped from 43,6 to 55% and this in spite of the further urbanization that went along with armament production. The Bureau of Labor Statistics reported an increase from 41 to 47% between 1940 and 1944 alone, for which the declining new construction could have been hardly responsible (BLS 1946:560). When the rent price became regulated in 1942, concerning up to 80% of the housing stock, the Office of Price Control (OPA), not controlling house sales prices, noted increasing evictions and sales and reacted, but "[i]n spite of stringent OPA regulation of evictions and the requirement of large down payments for home purchasing, the rate of tenant evictions almost tripled between June 1943 and April 1945" (ibid.). A 1940-44 survey of 120 cities found a median HR-increase of 28% and a "drastic shift of existing dwellings from the rental to the sales market" (ibid.). Whereas the effect of rent control on a limited *new* production is surprisingly still contested – though some evidence speaks in favor of a dying rental sector with permanent rent controls (Malpezzi/Ball 1993:50; Bertaud/Malpezzi 2001) – its effect towards conversions in the existing market has recently been shown (Fetter 2013). After WWII, even the absolute number of rental housing units decreases in spite of the US' witnessing their largest housing boom (Devaney 1994:20). Part of the converted units were just re-converted former owner-occupied units that had been lost to the rental market or remained vacant during the Great Depression. But as these amounted only to 725.000 units throughout the 1930s, many additional units of the rental stock must have been sold in the 1940s (Ratcliff 1944:375). Adding to the rent-control-related conversion, the process of white middle-class suburbanization also led to the sale of their former owner-occupied or rental central-city housing unit to black households who, in spite of dominant central-city location and mortgage discrimination, increased their HR by about 15 percentage points between 1940 and 1960 (Boustan/Margo 2011; Collins/Margo 2006).

Similar conversion-phenomena had already taken place after WWI but to a lesser extent as the housing shortage and rent controls were less severe and private construction took off earlier. Under what conditions did the conversions take place? A first enabling condition was the abundance of rented single-family houses, which are more flexible, legally and economically, for conversions into owner-occupied property. In 1940, of 12,8 million urban tenant-occupied units 4,1 million were in single-family houses, 3,0 million in two-family houses and only 3,4

million in buildings with five or more housing units; adding rural and vacant rented units, the dominance of low-rise structures in the historic US-rental market would become even more evident (Fisher 1951:94). The war-related housing shortage had increased house prices to an extent that landlords had an incentive to sell, while the end of rent control was hard to be foreseen or trusted.

Secondly, landlords, both institutional life insurances and the small investors, used the opportunity to withdraw from the rental market. With the 1920s' apartment boom bust, the Great Depression and then rent controls reaching into the 1950s, they had witnessed several decades of low yields on their investment in spite of their long-term perspective. Whereas life insurances held more than 60% of real estate mortgages in their portfolio in the 1860s, their percentage had fallen to only 13,2% in 1946 (Saulnier 1950:12, 39), certainly also a reflection of stronger competition on the residential mortgage market and the lure of alternative investment opportunities like railroad, industrial and government (war) bonds. These latter alternatives, including the earlier democratization of stock ownership (Ott 2011), incited the small investors also to transfer their money into the higher-yielding and more easily tradable assets away from rental housing (Winnick 1958:238). Rental housing income was moreover encumbered by both corporate income taxes and property taxes, while the latter could become particularly burdensome, when middle-classes moved out of the cities with municipalities depended so exclusively on them (Grebler 1950:133f).

Thirdly, tenants, although not necessarily willing to buy, accumulated more and more savings as consumption and price controls were tightened during the war. In the overflowing armament centers, incoming workers being paid war wages could also more easily afford the purchase than many sitting tenants (Muller 1947:16). Finally, once a sitting-tenant household was evicted and the housing unit sold over their head, the only way to find shelter consisted in purchasing itself a former rental unit thus triggering chain-effects throughout the market (Dean 1945).

A final conversion wave set in during the 1970s, when rental housing became scarce, house prices had soared and eventually the first rent price control in peacetimes was applied. The number of units concerned by conversions can only be estimated, but it seems to be closer to the German 0,4% converted rental units per annum than the British 1,4% during the 1970s, whereas the proportion in some metropolitan regions could attain up to 10% (Lundqvist 1986:46,191). Unlike in Germany, conversions were often initiated by developers and sitting tenants were less – or not at all – protected against evictions and relocation. The widespread absence of tenant protection can therefore also be considered one further reason of extended homeownership, even if only a specific group of upper-class urban dwellers is concerned in the

condominium-conversion cases. As the majority of the sold apartments were subsequently owner-occupied with evicted tenants also taking refuge in ownership, the overall homeownership balance of the conversions was positive (ibid. 70).

The conversion-phenomenon cannot be highlighted enough when explaining the German-American homeownership gap and the increase in American HRs and this for two important reasons. One the one hand, it considerably weakens the cultural-preference explanation of the high American HR. The culturally ingrained desire for a detached single-family house with garden in a suburban atmosphere seems to be have been less at the origin of homeownership leaps at critical moments in US history than the mere necessity to get some form of shelter at times, when the existing rental market was wreaked havoc. The conversion-phenomenon underlines, on the other hand, the supply-side effect of the existing building structure, as single-family homes seem to privilege a much easier conversion than the flat-conversion into condominiums in Germany, while the (re-)conversion from owner-occupied units into rented ones seems less problematic for flats than for individual houses controlled by property-value conservative homeowner associations (see 2.1). In other words, the more easily convertible single-family houses prevail in a country's or city's existing housing stock, the more probable it is that homeownership will spread once the conditions for the sale of rental units set in.

To further substantiate this claim, also suggested by Grebler (1952), the HR-variation of American cities having more than 100.000 inhabitants in 1944 were explained using the typical socio-demographic 1944 variables in the OLS-Model 1 and adding the 1940 percentage of single-family houses as a lag-variable in the Census-reported housing stock in Model 2, giving the following results:

Table 7: OLS-Regression (n=91), dependent variable: urban HRs

	Model 1			**Model 2**		
	Coefficient	*p-value*		*Coefficient*	*p-value*	
Constant	0.375718	0.00200	***	0.276507	0.00686	***
density	-3.53122e-06	0.06097	*	7.82989e-07	0.64798	
building permits 1942 relative to stock	0.40453	0.29811		0.122422	0.70826	
p.c. government revenue	-2.68545	<0.00001	***	-1.55736	0.00005	***
Rent level	0.00129361	0.37657		0.00164664	0.17968	
Overcrowding level	-0.00593602	0.01431	**	-0.00686543	0.00088	***
Population 1940	-8.84856e-09	0.27940		-1.03219e-08	0.13245	
% nonwhite	-0.202389	0.02761	**	-0.139939	0.06950	*
% 21+ of age	0.215945	0.25494		0.0598202	0.70846	
% single-family houses 1940				**0.263157**	**<0.00001**	*******
Adjusted R^2			**0,63**			**0,74**

The results show that beyond the typically assumed influence of the socio-demographic variables the 1940 housing structure strongly determined the homeownership level in 1944. As the level of new construction from 1940 onwards was low and the 1942 building permits are also controlled for, the higher 1944 homeownership levels can be explained by the higher degree of single-family houses in the housing stock, confirming the homeownership-conducive effect of the prior single-family house building type in cities.

Thus, much of the mid-century-homeownership leap of the US is apparently reducible to the conversion-phenomenon which is explainable in terms of features of the historically inherited housing stock. Even without war-destructions, a similar process would not have been perceivable in Germany as the given building structure was an entirely different one. The homeownership gap is of course not entirely reducible to the building-structure-plus-conversion explanation which is why the following chapter seeks to make plausible how even for *newly* constructed housing units the inherited features of the continuous urban production regime remained active. I will argue that property-value conserving governance modes of the private city, SLA-based housing finance and Fordist single-family-house mass production have jointly added successive layers of homeowners around American cities, accounting for the further HR-increase up to almost 65% in 1980.

2.1 Private city continued

The 19th-century born tendency of American cities to suburbanize and turn into "private cities" all but stopped over the 20th-century and the rise of owner-occupied suburbia and simultaneous decline of inner-cities has become a standard postwar narrative (Jackson 1987; Logemann 2013). Typical factors identified as causes behind these tendencies were the rise in incomes, the demographic boom, the highway construction and further spread of automobile ownership, the FHA mortgage insurance guidelines, the central-city rise in crime and desegregation of schools (Margo 1992; Baum-Snow 2007), to name but the most prominent factors. At the same time, legal instruments and arrangements to maintain the home-rule of local government against interventions from above guaranteed the private character of city construction and politics that even federal government interventions through local housing or school busing could not reverse. In elaborating on these tendencies, this section substantiates the claim that the physical and institutional structures, historically laid out on the urban level, have been continuous with the more recent developments and are therefore not reducible to the later federal interventions. The difference to the German case is that the inherited nature of cities was a much more volatile and corrosive one – lower longevity of the housing stock, higher rates of mobility and the opening up of entire suburbs and abandoning of others. The inherited pattern in the American case is therefore rather one of permanent change. On the other hand, even in the American case, the inertia of once established structures should not be underestimated. Even if natural catastrophes could destroy large parts of towns, they were often erected at the same place following the old property relations (Rosen 2003). Even if the second half of the 20th-century witnessed a population shift from the rust- to the sun-belt, rust-belt cities such as Pittsburgh or New York are still thriving while others, though depicted in gloomy colors of decay, still figure in the ranking of major American cities even if relegated to lower positions. The once established system of cities has hardly changed.

The impact of the residential real estate bubble in the 1920s on subsequent events has sometimes been overlooked and with the latest real estate crisis historical comparisons have re-opened the puzzle about the causes of the 1929-crash and the ensuing Great Depression in order to add speculation and overproduction in real estate, beyond the 1926 land bubble in regional Florida, to the set of possible causes. A yet more far-reaching consequence of the land speculation was the abundant provision with vacant lots of land and entire to-be-neighborhoods, laid out in gridiron-ways of speculative planning in the 1920s, available for large-scale construction from the 1940s onwards. A lot-statistic of 1936 New Jersey revealed that the entire state population could have been accommodated twice on the many half-developed lots

produced by prior overproduction, thus laying the ground for post-war suburban expansion (Field 1992:791).

Very revealing, much of post-WWII historiography about urban America is not about cities per se, in spite of studies about inner-city decline, but about the rise of suburbia, in which more than 50% of Americans came to live (cf. Hayden 2003). As virtually all new planned suburbs were planned for homeownership the suburban phenomenon and the 20-percentage-point leap in post-WWII-HRs go hand in hand. Suburbanization was not only residential, but also concerned the relocation of industrial plants and even offices to the edges of cities as well as the transition from the central-city department store to the exurban malls. Once in place, these processes reinforced each other mutually.

A common enabling condition of these processes was the spread of private cars, trucks and buses on the expanding interstate system of highways that gradually replaced both railroads and urban mass transit as main means of transportation. Of all world cities of the later 20th-century, American cities stand out as the most sprawled and privately motorized. If measured by petrol consumption, car ownership, yearly kilometers by car versus by public transport or the number of central-city as compared to suburban jobs, American cities, closely followed by other Anglo-Saxon countries, systematically differ from continental European with eastern European and Asian cities even surpassing European ones in density (Newman/Kenworthy 1991). This significant difference is the outgrowth of the aforementioned history of more radical adoptions of new transport technologies in the US, completely erasing older ones, this time private cars replacing mass transit that would have slowed down the centrifugal forces.

It is true that the private car equally made its inroads into German cities, but only from the 1960s onwards did it influence city construction through suburbs, while even then mass transit systems were maintained (Schmucki 2001; Simpson 1987). Whereas the private car by the 1970s was able to cut German public ridership numbers back to Weimar times, it almost extinguished all mass transit in most American cities. This difference is also reflected in one of the persisting differences in consumption patterns in the United States and European countries, with Americans spending significantly more on private transport items (Kaelble 1997).[41] The democratization of car ownership already began in the 1920s, actively promoted by an oil-car-rubber industrial complex that started and subsidized competing bus lines or bought up mass transit only to shut it down (Lenger 2009b:278).[42] The competition through busses also

[41] Here again one is inclined to refer to a geographical explanation based on population density, but comparisons with northern European countries of equal density that yet display the European pattern defy this explanation.

[42] The differences in regulation and development of mass transit reveal many complementarities to those of railroads in the respective countries (cf. Dobbin 1994).

weakened the formerly strong public transit worker unions that had profited from its monopoly position at the end of WWI and had yielded above-average wage raises (Yago 1984:55). It would be wrong to describe the auto-complex, lobbying for more federal money in favor of more highway construction, as absent from German politics. Only, with Hitler's preference for German motorization, it came up later, was primarily for military purposes[43] and encountered from the 1950s onwards a well-entrenched local basis of mass transit supporters (Logemann 2013:170).

Figure 19: Decline of mass transit (millions of miles)

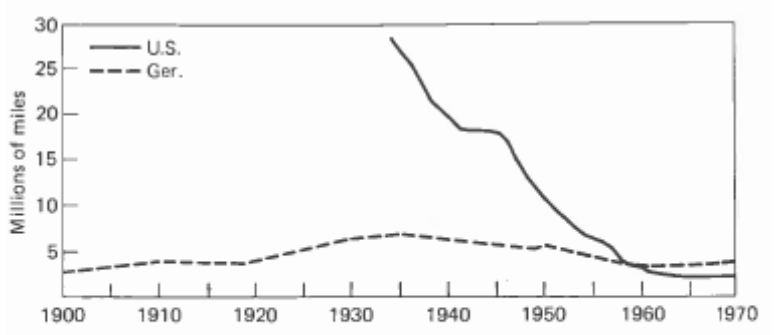


Figure 2.2. Decline of rail transit in the United States and Germany, 1900–70. (Sources: for United States: *Historical Statistics of the United States*, U.S. Census Bureau, 1975; for Germany: *Statistiches Jahrbücher des Deutsches Reich, 1920–71.*)

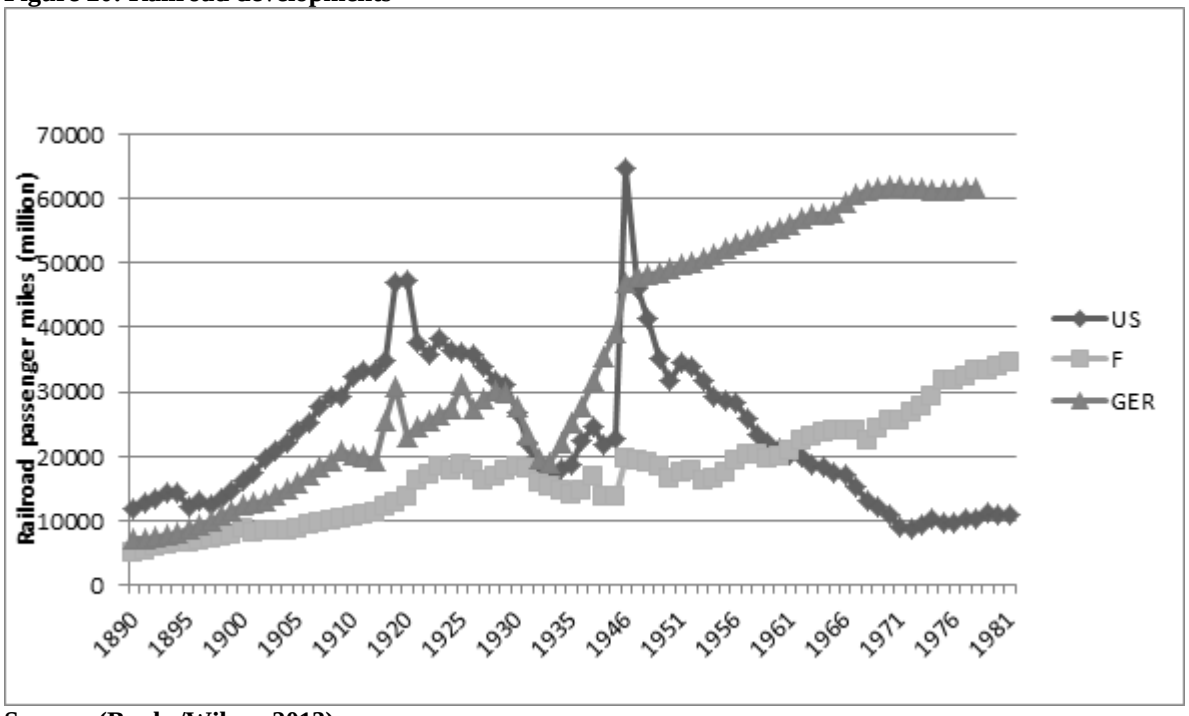
Source: (Yago 1984:10)

An important part of the auto-lobbying effort were the highway construction policies. Though Germany was earlier in developing a comprehensive highway system with few cars to run on it in the beginning (Becker 2005), the American adoption of modern highway building was given exceptional federal funding and contributed further to the dispersion and inner-city decline of American cities. Ever since the first bicycles and automobiles, especially urban dwellers had demanded (more) federal funding in favor of highway construction, leading to the first federal involvement in the Federal Road Acts 1916 and 1921. The New Deal public works programs and eventually the 1944 Interstate System, whose 41.000 miles were not finished until 1984, set the US on the "asphalt path" (McShane 1994). The highway administration acted very much independently from local planning agencies and even from other New Deal institutions such as the housing-related federal agencies (Biles 2011:43). One of the consequences was that the combination of circumventing beltways along city borders and inner-city freeways led to further city sprawl: the former allowed for the decentralized settlement of industry and

[43] The so-called people's car (Volkswagen) project of the Deutsche Arbeitsfront (DAF) remains a rather upper-class project and *de facto* military motor vehicles were fabricated in the Volkswagen plant (König 1999; Becker 2005:40).

commerce, the latter, intended to ease congestion problems, allowed for even faster and farther private commutes to the city center. The inner-city freeway construction alone, endowed with strong expropriation rights, cut through existing city neighborhoods and led to a relatively unplanned resettlement of many former tenants, at a time when urban renewal had destroyed 140.000 low-rent units in ten years (Warner 1972:47; Gelfand 1975:208). Still planed under the Pearl-Harbor shock, the interstate system was mainly motivated by military purposes, the most efficient connection of cities and regions to allow for rapid mobilization, transport and evacuation, whereas commuting purposes was neglected. It has been estimated that "[...]each new highway causes constant geography central city population to decline by about 18 percent, all else equal" (Baum-Snow 2007:776).

Figure 20: Railroad developments



Source: (Banks/Wilson 2013)

Accompanying the suburbanization process, the 19th-century tradition of the "private city", with the retreat into single-family home suburbs, the fragmentation of government and privatization of services progressed through various stages in the 20th-century and was not even reversed by the Great Society efforts. These tendencies continued to allow for new settlements with differentiated service levels beyond the grasp of municipal building codes which would have made certain low-end settlements more difficult.

Roughly two decades after German cities had introduced differentiated building zones to organize cities into zones of different uses, to domesticate further chaotic city constructions through tenements, American cities introduced zoning less as instrument of urban reform than

as legal instrument of particularistic neighborhood interests to maintain property values and exclude non-desired land uses (Logan 1976). The first NY zoning law of 1916, the request of local merchants to drive out foreign-labor employing production sites out of their streets and copied by 591 cities a decade later (Warner 1972:32), explicitly mentioned the purpose "to stabilize and conserve property values, to relieve the rapidly increasing congestion in the streets and in the transit lines [...]" (Willis 1986:46). In 1926, the US Department of Commerce developed a model state zoning act spreading zoning ordinances in most local governments (Ladd 1998:12) and subsequently courts interpreted nuisance avoidance, hygiene and general welfare quite liberally, making zoning an effective instrument of exclusion of undesired uses (Nelson 1980). These planning instruments and also the extension-plans for suburbs became forceful instruments, but they were mostly applied on the suburb-, not on the city-level (Schaefer 1994:142ff).

Another instrument in favor of exclusive and property-value controlled housing conditions have been the deed restrictions and restrictive covenants, introduced by suburban developers in the 1880s to maintain the romantic aura of expensive suburbs. Written into the deed, the buyer of a lot is thus restricted in the possible uses she can make of her property, where the restrictions concern the required characteristics of the building type, the number of stories or else its architectural style. Very soon they also included prescriptions about which "races" were allowed to buy the properties. Intensively used by realtors to market their properties, the racially restrictive covenants even made it into the list of requirements demanded by the FHA underwriting manual for the government guarantee of mortgages (Jackson 1981). Interestingly, these forms of private local government have their origins in the realtors' suggestions for garden-city of Radburn, one of the New Deal reformer settlements (McKenzie 1994:27; Fogelson 2005).

Finally, with the increasing homeownership in condominiums from the 1960s onwards (Natelson 1987) the institution of homeowner associations began to proliferate as a new kind of private government. In the 1990s these associations were said to embrace 32 million Americans as members, living in 11,6 million housing units or 11% of the housing stock, whereas around half consisted of single-family homes and half of condominiums and cooperative units (McKenzie 1994:11). These associations own the properties collectively, have compulsory membership and impose upon themselves a highly conservative regime of building restrictions in favor of maintaining housing values at all cost.

The upshot of all these tendencies is a reinforcement of homeownership tendencies because these private city-planning instruments are largely used by and for homeowners to exclude negative externalities from obstructing their housing investment. On the one hand, they can be

interpreted as insurance devices protecting households' often most valuable asset against untoward influences. Permitting these far-ranging forms of private government can therefore also be interpreted as a kind of social policy alternative for insurances of public pensions. The tax revolt movements against a reassessment of properties' market values to broaden the tax base beginning in the 1970s can be seen as demanding the maintenance of such a policy (Clarence 1990; Martin 2008). The so-called homevoter-hypothesis tries to explain the far-reaching interventions and taxes property holders surprisingly are willing to accept thanks to the expected capitalization effect in housing values (Fischel 2001). On the other hand, among typical restrictions, one finds the exclusion of multi-family buildings and rentals as well as of low-income projects that would undercut the neighborhoods homogeneity.

From the very beginning of, especially racially, restrictive rules in zoning ordinances or covenants, court battles about their legality accompanied their history. From the earliest ruling against racial zoning in 1917 to the Mount Laurel rulings (1975, 1983, 1985) against suburban exclusion of low-income housing associations, absolute self-government of local communities has been questioned (Ladd 1998:13), while the latter time and again tried to evade the judgments, for instance by using alternative restrictive characteristics correlating with race instead of direct racial restrictions. An indirect effect of the environmental movement, for instance, was to permit new rationales to justify the exclusion of density-increasing new settlements in neighborhoods. The protection of suburban autonomy against prescriptions from above has also been on the agenda of Republican presidencies since Nixon, who also appointed various Supreme Court justices ruling in favor of suburban local governance (Lamb 2005).

Not only did the fragmentation into smaller and private government proceed, also further incorporations of suburbs into existing cities stumbled increasingly on the referenda requirements (Brennan 1991). After the 1900s, the tendency towards incorporations of outlying suburbs into cities was stopped and the number of separately incorporated and special-purpose governing areas such as school-districts proliferated to almost 90.000, while the German numbers of incorporated units fell below 10.000. Whereas some southwestern cities such as Huston, TX, were counterexamples to this trend, there also is the phenomenon of large parts of the population living in unincorporated areas, which constitute about half of all non-federally owned areas in the US. Desired services are sometimes provided in cooperation with adjacent cities, while the county remains the closest level of local governance, providing only the utmost minimum of public and political infrastructure (Ghorra-Gobin 1991). One example for private solutions of formerly public infrastructure is the spread of cesspools replacing municipal sewage systems. Placed under individual properties, these waste water collectors allow suburban settlements in any distance from existing sewer systems while costing less than half

in the 1950s. “In 1945, according to one government estimate, only about 4.5 million homes had septic tanks. In 1960 [first count], the first census counted nearly 14 million“ (Rome 2001:88). In spite of environmental and even drinking water problems surging as a consequence of leaking cesspools, their number did not stop to increase and reached almost 25 million in 1990 (ibid. 115).

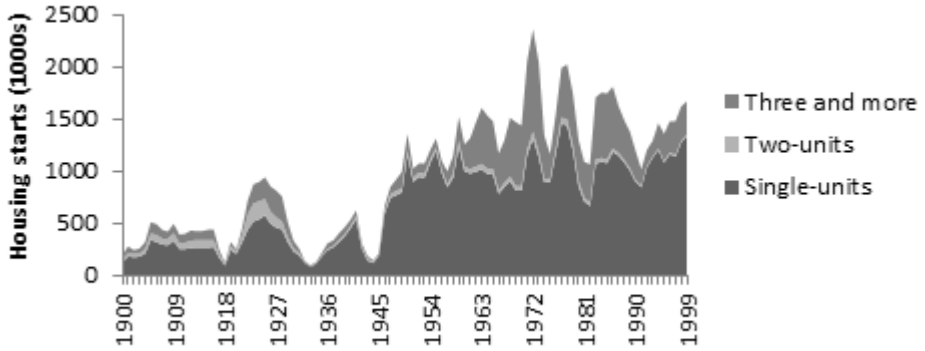
2.2 SLAs instead of non-profit housing

While cities have thus rather become managers of interdependent property values over the 20th-century, both overall mortgage indebtedness, the institutionally lent mortgages and the SLA share in this market grew to new heights. When the SLA-movement attained a size beyond effective self-regulation in the 1920s, the government designed banking legislation during the New Deal that reinforced the role of thrifts as the financer of single-family housing: banking regulations prescribed a high share of asset investments in residential real-estate of one-to-four units per structure as well as maximum limits of interest rates paid on deposits, leaving the SLAs with more leeway than commercial banks. Thus, SLAs remained practically shielded from interest-rate competition until 1966 and then the 1970s, when market interest rates due to inflationary pressures rose above maximum regulation (Krippner 2011:83).

While the SLAs survived the initial financial crisis and bank runs following the 1929 stock market crash rather smoothly because they did not have to hand out deposits until after one month after the request, the subsequent foreclosures hit them to a stronger degree, with about half of the rescue credit demands at the government-set up Home Owner Loan Corporation (HOLC) coming from thrifts (Mason 2004:112). The Corporation was estimated to have bailed out about 40% of mortgage-holding, non-farm owner-occupying small property households until its final and profitable liquidation in 1951 (Harriss 1951:16). Beyond the temporary HOLC-intervention, the major New Deal housing laws bore the SLAs’ and the realtors’ trademark to a very large degree. The Federal Housing Administration (FHA), an government insurance of newly issued mortgages fulfilling standardized criteria, set up by the 1934 National Housing Act, was an advanced version of the 1919 proposition of the real estate industry, modeled after the farm loan insurance system. The early administrations were heavily staffed with former experts of the realtors, the SLA-movement and the larger community builders (Hornstein 2005:143f). It was during his speech before the US Savings and Loan League in 1942 that President Roosevelt showed his famous homeownership-sympathy, saying that “a nation of homeowners, of people who own a real share in their own land, is unconquerable” (in Kelly 1993:49).

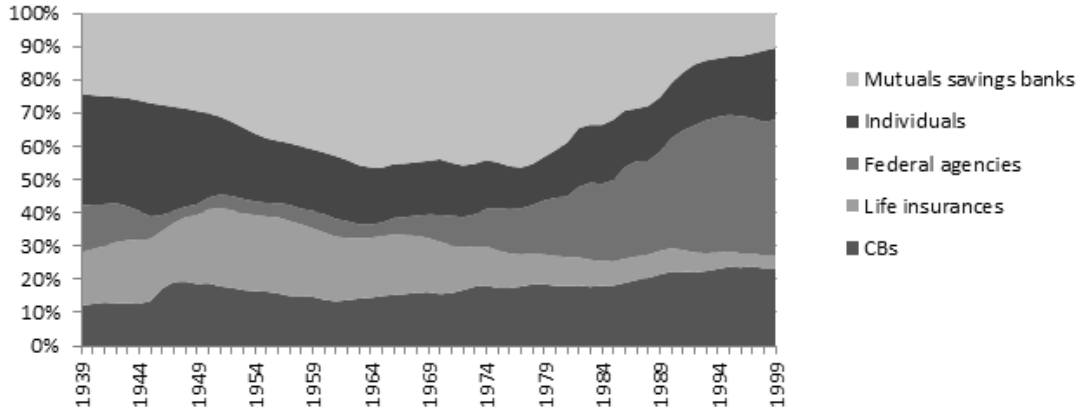
The post-war boom in mostly single-family units coincided with a strong increase in the share of SLAs in the amount of outstanding mortgages generally and the small mortgages in particular with market shares beyond 50% (see graphs below). While taking less advantage of the new governmental FHA and veterans' administration's (VA) insurances than commercial banks at the beginning, SLAs soon took part in the general post-FHA-intervention tendency of longer-term-lower-interest loans with higher LTV-ratios (Grelber 1960:14).

Figure 21: Housing starts in thousands according to the building type



Source: (Snowden 2006b; 2006c)

Figure 22: Percentage share in non-farm housing held by different mortgagees



Source: (Snowden 2006e)

The graph also indicates the loss of market share of SLAs after the SLA-crisis at the beginning of the 1980s (Barth 1991). There is no denial that the line of continuity in the American mortgage banking has been broken with the de-regulation of deposit-interests in the late 1970s; in fact, the SLAs' attempt to engage in, for them, foreign commercial and apartment-house markets was part of the reason of their dismal failure in 1981. Much has been written about the rise of governmental-securitized mortgages and the finance revolution from the 1980s onwards

and not few scholars have linked it to the rise of American and even worldwide homeownership (Rolnik 2013). This rise coincided with the SLA-crisis and one could claim that the SLAs are therefore irrelevant for the explanation of the higher American HR.

A first objection to this claim, weakening much of the recent financialization literature explanations (Rajan 2010:9), can be based on the observation that the American HR had already reached a level of 64,4% in 1980 after a growth of almost 47,7%, whereas the HR even fell by 0,2 percentage points in the decade of the financialization-1980s and grew by only 7,5% [!] up to the second quarter of 2004's 69,2% HR, being the most favorable value, the highest in the recorded American homeownership history. Most of the homeownership expansion, the first expansion of the non-farm HRs from the 1900 36,5% to the 1930 46% (Snowden 2006f) and the second expansion from the 1940s' 43,6 to the 1980s' 64,4% has therefore paralleled the rise of the thrifts to the dominant mortgage banking institution. Much of the consequences of financialization have therefore just consisted in *maintaining* the high level already reached in prior periods.

A second objection relies on the observation that the rise of secondary mortgage markets would hardly have been possible without the SLAs and the FHA-standardization of their single-family home mortgages. It is remarkable that the exceptional form of US securitization has not taken place in countries such as Germany, where coveted-bonds issuing mortgage banks had already occupied the real estate bond market for a long time. For these reasons, the fact that the US developed a thrift-based housing finance system without mortgage banks and non-profit housing already in the 19th-century can still be regarded a relevant explanation for the low American HR today in spite of a dominance of secondary-mortgage-market institutions from the 1980s onwards.

The public housing circuit

Accompanying the rise of the BLAs and homeownership, there was a brief social housing interlude of European style during the New-Deal era, whose result, however, was no broad social housing movement but the residual public housing of today's notorious reputation (Vale 2000). The absence of a reformer- and labor-supported cooperative and limited-dividend precedent impeded the rise of a non-profit housing sector once the New Deal government decided to intervene in the housing market (Bauer [1934] 1974:254). Therefore the 19th-century juncture in favor of SLAs and against non-profit housing associations was reinforced in the 20th-century. Risen to a strong pressure group in the 1930s, the SLAs even actively contributed to the US' not turning into the non-profit rental housing policy direction much like the German housing associations had tried to prevent the *Bausparkassen* from rising in the 1920s.

After the request of a report about workers' housing conditions in 1892, the US government's first serious intervention into the housing market occurred in WWI with rent controls and direct housing construction for workers in war-related industries (Wendt 1962:145). Private businesses and real estate alone were not able to provide sufficient housing because investors preferred government or industrial bonds to investments in housing in spite of promises of guaranteed 6% profit (Radford 1996:17f). Thus, the Labor Department's Housing Corporation acted itself as developer, construction supervisor and final landlord of about 6.000 housing units in developments resounding garden city ideals. Moreover, the governmentally set up Emergency Fleet Corporation constructed another 9185 units (Radford 1996:18). Both were founded and attributed funding in 1918, only to shut down in 1919, while many of the planned projects were never realized (ILO 1925). While a small fraction of planners and garden-city inspired architects, including the AFL at the time (Wollmann 1973:160), fought for a transfer of the governmental housing units in cooperative ownership, the first US public housing experience was soon to be channeled back to the private market by private real estate interests fearing government competition. "At the close of World War I, Congress was not only unwilling to launch any cooperative housing experiments, but took action to rid itself of involvement in the low-cost housing market altogether. By 1924, most of the housing built by the Emergency Fleet Corporation and U.S. Housing Corporation had been sold on the open market for whatever it would bring" (Bailey 1988:17). It is worth mentioning that in lack of intermediary housing associations, already at that time, the US government intervened much more directly and intensively, even if surgical in specific places only, than most European governments who either relied on the incitation of private actors or cooperated with existing municipal or the cooperative-born housing associations.

The one state in which the tradition of cooperative housing for lower-income classes did survive was New York, where the Regional Planning Association of America around Louis Mumford and Clarence Stein funded the City Homes Corporation to build cooperative apartments called Sunnyside Gardens on Long Island (Lubove 1963); the failed acceptance and deficient acquaintance of cooperative ownership among workers motivated the group to adopt individual ownership in their second more famous garden suburb development of Radburn, NJ in 1928-33. In 1926, the NY-Governor Al Smith passed a limited-dividend law that granted recognized companies tax exemptions in return for their fulfilling the limited-dividend and lower-income construction requirements. International Ladies' Garment Workers' Union and the Amalgamated Clothing Workers of America were the main beneficiaries and constructed several thousand units until the 1950s, the latter union explicitly considering its housing

projects as an alternative form of community building including other union cooperatives and collective amenities (Vural 1994).

This local heritage of successful cooperative housing combined with reformer groups socialized in the regional planning garden-city tradition and the settlement movement, supported by national unions, also offered the subsidized non-profit-housing in garden-city-like community developments as serious alternative in the New Deal era to the private-mortgage-finance-focused reform strategies that the private real estate sector preferred and pushed through. When president Roosevelt took office in 1933, the early New Deal experiments covered a wide range of ideological directions and the housing programs included, on the one hand, the successful pillars of governmental support for private mortgage financing – the 1932 system of home loan banks for the immediate support of mortgage-foreclosure endangered households and banks (HOLC), the 1934 FHA-insurance of privately lent mortgages and the 1937 creation of a secondary market for mortgages through government agencies. On the other hand, the Greenbelt city program saw the government construction of from-the-scratch decentralized garden cities under Rexford Tugwell's Resettlement Administration; under the Public Works Administration (PWA) limited-dividend housing for lower-income groups was to be supported by governmental subsidies and, eventually, the Wagner housing Act of 1937 created the foundation of today's public housing program.[44]

Under the National Industrial Recovery Act, the PWA created a housing division that took up a limited-dividend subsidy program originating in Hoover's Reconstruction Finance Corporation which, in 1932, had already looked in vain for housing associations worthy of its subsidies, finding only one association in NY. The continuing PWA-program suffered a similar fate when the Carl Mackley Homes of the American Federation of Full-Fashioned Hosiery Workers remained the only completed housing project. The lack of adequate housing association as addressees of subsidies outside of New York brought Harold Ickes, Secretary of the Interior, to fall back on direct governmental top-down developments, constructions and final ownership of local housing authorities often still to be set up.

A group of national housing reformers organized in the National Public Housing Conference, Senator Wagner, the National Association of Housing Officials and eventually the AFL had lobbied for a stronger European solution. But this group of reformers met stern resistance from the private real estate industry, spearheaded by the US Building and Loan League, the National Association of Real Estate Boards (NAREB), the National Retail Lumber Dealers Association and the Chambers of Commerce (McDonnell 1957:60), which all were concerned by

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[44] A number of temporary farm housing programs would complete this list (Bailey 1988:30ff).

questioning one or another aspect of privately financed and traded wooden single-family houses as dominant form of housing provision. These private industry groups, also labeled the home-ownership network (Loeb 2001:143ff), could look back upon at least a decade of successful public campaigning within the "Own your Own Home" movement, organized by Herbert Hoover, Department of Commerce, under his private "associationalism" which sought to promote more efficiently provided homeownership thanks to industry cooperation and acceptance of voluntary guidelines (Hornstein 2005:138). It inspired the 1928 "Better Homes" campaign with Hoover and even Coolidge as mentors which attained 7.200 local chairmen in 47 states, mainly an information, publication and lobbying network (Vale 2007:23). This movement with widely branched local clubs of promoters culminated in President Hoover's 1931 conference on homeownership resulting in eleven volumes of publications which mainly provided the blueprint for the homeownership policies to come, aiming at the creation of long-term, amortized mortgages, low interest rates government-support for the low-income families and a reduction of home construction costs through prefabrication (Jackson 1981:83).

In 1940 and 1942 under the Lanham Act the government intervened anew in housing for war-related purposes and eight projects, amounting to 167.700 final units, were provided under a mutual ownership plan, not seldom in collaboration with interested unions (Bailey 1988:57). During the postwar housing shortage, some of these units were sold under cooperative ownership, using FHA-insured mortgages for these purposes; around one third of the units were single-family homes most apt to be sold individually, an option most strongly defended by Republicans and the real estate industry. These forces, in opposition to the president, veteran, labor and reformer groups, also prevented successfully the inclusion of a Title III in the Fair Housing Act's 1950 amendment according to which government subsidies were to be given for lower-middle-class concerning cooperative housing, mostly in form of homeownership (ibid. 99ff). With the housing reformers already faltering, labor profiting from both the construction boom and the middle-class mortgage provisions and a general skepticism against everything remotely associated with forms of collectivism in McCarthy-America, the US eventually turned its back to the non-profit housing path that witnessed its breakthrough in Germany at the same time. Already by 1951, the *New Republic* headlined "Housing: A Vanishing Vision. The Housing Movement in Retreat", attributing this state of affairs to lacking leadership and organization at the generation's turn (Conn 1951).

A similar fate waited for the philanthropic housing movement. Two limited-dividend companies in Washington, for instance, managed a housing stock of more than thousand units in the 1930s, yielding a 5 and even 6% dividend to their investors based on more-than-average rents of their mostly two-unit small attached houses. But by the 1930s, with the 19th-century

founder generation of philanthropists dying, taxes and interest charges in times of rising labor and material costs made a survival difficult. No tax exemptions or subsidies helped the companies out; instead the newly constructed public housing units even meant new competition, practically leading to a crowding out of philanthropic by public housing. The units were eventually sold to private investors who then sold the easily convertible rental units in individual owner-occupied ones (Hannold 1993:36f).

The homeownership-tradition among American working-man consolidated in the 20th-century (Halle 1984). Already prior to 1940, many of the 174 residential suburbs identified by the Census were entirely or partially of blue-collar character (Harris 1996:282f), some industrial suburbs further helped to decentralize the working-class as well. Homeownership numbers of AFL-CIO members are reported to be above the American average in the 1970s (Jackson 1987:7) and its Mortgage Investment Trust financed union-members homes below market rates (Botein 2007:805).

The AFL briefly supported demands for municipal housing after WWI and joined the National Housing Conference reformers around Catherine Bauer demanding government subsidies for public housing. The labor participation in the pro-public housing coalition reached only into the 1950s and gradually waned with ever more unionized workers entering homeownership and with the private construction boom making public housing construction dispensable as employment alternative. The retreat of public housing support also coincided with the beginning decline of unionism in the US (Goldfield 1987), reducing many unions to homogenous clubs of skilled workers in suburban housing environments without interest to construct public housing units in central cities for residents foreign to its own membership base (Luria 1979; Parson 1984).

On the political level, homeownership objectives did not become a cleavage line between the two major parties on the national level. Almost all presidents can be found to have extolled the virtues of more homeownership at one point in their presidency (Quinn 2010:27) and major institutional innovations such as Hoover's HOLC, Roosevelt's FHA or Johnson's privatization of Fannie Mae, have not been reversed by successors of different parties. Throughout the 20th-century party manifestos, presidential addresses and state-of-the-union speeches, the federal support for homeowners appears as the common denominator of different policy directions. This finding contrasts with the German constellation, where unions and social-democrats were historically hostile towards homeownership as a political goal.

The cleavage line with respect to housing focused much more on the design and extent of public housing with Democrat presidencies known for the introduction (Roosevelt) and expansion (Johnson) of public housing and Republican presidencies known for their respective

cut-backs of new funds and sales to sitting tenants (Nixon, Reagan) (Marcuse 2001). Already during the design of public housing in the Wagner Act, rural and Republican opposition managed to pass amendments, limiting construction costs, outlawing federal subsidies for maintenance and allowing public housing only as replacement for demolished slum housing (McDonnell 1957:324). These amendments predestined public housing to become lowest-cost housing for marginal groups, clearly stigmatized in comparison with the remaining housing stock. The absence of municipal land banks required authorities to buy expensive urban land, leaving the traditionally suspect multi-story buildings as the only economic choice for public housing units (Urban 2012:24). This contrasts with the German constellation where both parties, also through their ramifications into social housing associations and municipalities, backed social housing construction in principle and where social housing units are less clearly identifiable as qualitatively and geographically separate from the standard housing stock. With the decline of the housing reformer movement, public housing lacked a strong constituency that could have equaled national realtors' and SLA influence at yearly budget debates or their local opposition to each undesirable public housing project.

To summarize, the established private real estate interests spearheaded by the SLA-movement and their net of existing mortgage-bank-net determined the first and major housing policy intervention and impeded strong alternative paths from rising. When the SLA resigned from being the most important mortgage lender for American homeowners, major homeownership leaps had already been undertaken and mortgage-securitization rather replaced the SLAs' lending role instead of turning away from the existing single-family-homeownership path.

2.3 Mass production in the construction industry

Already in the 1930s and most certainly after WWII did large-scale Fordist-like construction companies see the day in the housing boom regions of the US. The tendency towards large builders or community builders that has been located by some in the 1920s (Weiss 1987) or even in the 1890s (Doucet/Weaver 1991) witnessed a further breakthrough throughout the 1940s. While companies such as Levitt and Sons or Eichler had already built entire subdivisions of single-family homes for higher-income households in the 1930s, the government demand for war-related housing (Reed 1995), the postwar-constructions for veterans and eventually the homes financed with FHA- and VA-insured mortgages extended their market and increased the construction numbers to the level of whole new towns.

On the one hand an already existing tendency to prefabrication and large speculative house building, started around the centuries' turn, was thus prolonged, contrary to scholars who

consider it merely a modern phenomenon (Buzzelli 2001). “According to a survey of 72 cities in 1938, only 6 per cent of the builders erected as many as ten houses in a single city during the year, but they took out nearly half of all the permits issued for single-family dwellings. In San Francisco, Baltimore, Philadelphia, and Queens and Brooklyn boroughs of New York more than half the homes were erected by builders of 25 houses or more” (Dean 1945:22).

On the other hand, it needed specific circumstances unique to the post-war period to produce the break-through, notably the bottled-up demand and savings of both Depression and war, the baby boom with its expected repercussion effects, private cars and the mortgage-transformation undertaken by the FHA which insured both bridge construction loans for builders and the purchasing loans of the final consumer (Eichler 1982:46). Besides opening up an entirely new layer of LTV-ratios and customers to the mortgage market, the FHA’s explicit policy was to favor not the small builder of one or two houses, but large firms with capacity to subdivide and build entire communities. Also the homogeneity-requirement for neighborhoods of the newly built houses in the FHA underwriting manual played into the hands of mass-producing builders (FHA 1936:sect. 316). “Large builders alone accounted for 5% of all houses built in 1938, 24% in 1949, and 64% in 1959” (Checkoway 1984:24). Thus, there was a close link between the mass-produced private single-family home, the SLAs which extended mortgages to construction loans to builders (Klaman 1961:161f), government-insurers and merchant builders:

> “Although FHA was authorized to insure rental housing and had a division headed by Miles Colean to promote large-scale rental construction in big cities, the Administration’s overall community building bias toward suburban-style subdivisions was quite pronounced. In 1940, for example, of the total new dwelling units financed by FHA mortgage insurance, less than two percent were for rental housing. All the rest were one-to-four family homes, mostly single-family. Rental housing also represented less than two percent of the dollar value of all mortgages insured by FHA in 1940, and less than one percent of the total number of insured mortgages. In addition, most of the rental housing mortgages that were insured were for new garden-type apartments in suburban subdivisions” (Weiss 1987:154-55).

The initial pinned-up postwar demand was certainly a special event, but it would equally be wrong to consider the concentration in the construction sector as a merely temporary phenomenon. Large builder of more than 100 units, though making up a small share of all builders, produced mostly more than 50% of all units throughout the second half of the 20th-century, as the following time series suggests:

Table 8: Number of builders and corresponding unit output per size and year

Year/Builders	1 to 25	26 to 100	>100
1949	96,2	3	0,8
1959	57,5	29,8	12,7
1964	64,4	27,6	8
1969	58	30	12
1976	67	25	8
1987	76,5	15,9	7,7
1992	81,7	12,8	5,6
1997	81,7	12,1	6,3
Year/Units			
1949	46	21	34
1959	10,2	25,7	64,1
1964	15,8	32,7	51,6
1969	21,5	36	42,6
1976	8,4	34,1	57,5
1987	12,6	29	58,4
1992	18,1	34,5	47,4
1997	18,9	27,9	53,2

Source: (Buzzelli 2001:65)

Compared to other industries, the large number of small companies and self-employed people is still exceptional, but their share in output was considerably reduced. It is also true that most European construction sectors as a whole are more concentrated than the American one. Comparative data on the *residential* fraction of the building sectors alone are usually missing and large European construction companies might just be a reflection of higher urbanization and multi-dwelling construction shares, correlating with larger company sizes. The important point is that the size of single-family-house producing construction companies in the United States are larger and more dominant in the market than their comparable German counterparts, this holds for both the large producers of factory-manufactured houses and especially the entire-subdivision constructing merchant builders, while the large share of custom-built houses with non-speculatively building individual households remains a German particularity (Duncan/Rowe 1993).

The rise of the large “community builders” in the US was closely connected with the rise of homeownership as they tended to build suburban single-family homes on large tracts and almost exclusively for sale because their capital resources were chronically low. While Abraham Levitt (and sons), the largest and most emblematic builder between the 1930s and the 1960s, building the so-called Levittowns of more than 10.000 units, had also built for sale to landlords or remained landlord himself in the 1930s, large builders after WWII were strongly associated with single-family house building for homeowners, before they diversified construction in the 1960s to include apartment-houses (Eichler 1982). Levitt’s sale of his rental houses mostly to sitting tenants also liberated the necessary capital to construct the first

Levittown, while the previous rental construction was said to have been only a temporary wartime phenomenon (Kelly 1993:32, 74). These community-builders fit also into the American private-city tradition of non-municipal land-planning because builders learned to build virtually everything from streets via houses to new churches or community-centers, soon to be protected under conservative zoning umbrellas. Existing municipalities, often without pre-existing city-planning, usually had to give way to such concentration of capital and competence (Checkoway 1977:175).

The key to the production of large builders was the import of Taylorist mass production techniques into the on-site production of homes. First, labor was divided into finer-grained tasks undertaken by newly composed crews that did not necessarily overlap with the existing craft-structure of the trade. This also implied more use of lower skill labor, not necessarily union bound as unions remained quite protective of their established trade jurisdictions. Residential housing, however, has been traditionally among the least unionized segment of the market, estimated at about half of the workforce in trades that were often entirely closed-shop, while today the estimate runs at less than 20% (Scheuch 1953; Philips 2003:177). Levitt also had an explicit anti-union strategy (Checkoway 1984:27), luring non-union workers through stable employment opportunities and higher wages. Unions which often were a guarantor of local building codes and conservative as to construction techniques could often be eschewed because much of the construction and population growth took place in the low-unionized southwestern state which witnessed a strong industrialization and the rise of the gun-belt (Storper 2013:26). With lower unionization, there was also less available high-skilled labor as unions controlled most of the apprenticeships (Philips 2003); but even in spite of government intervention in the apprenticeship system during WWII, the national number of new apprentices did not even suffice to reproduce the core skilled labor force after the war (Haber/Levinson 1956), even though until these days the "[c]onstruction apprenticeship training is the largest system of privately financed higher education in the United States. Training lasts from 3 to 5 years depending on occupation. Entering classes run about 40,000 students per year. At any one time, roughly a half million apprentices are enrolled. Collective bargaining accounts for 75-80 per cent of these enrollments" (Philips 2003:173). Since merchant builders demanded large amounts of temporarily employed low-skilled workers in peak times, skilled artisans, usually found in the more personal and stable employment relationships with small contractors, were also not on offer for them (Maisel 1953:114). But even in the many places in which merchant builders dealt with unionized labor, the latter only rarely fought out jurisdictional fights and acquiesced in work with new fabrication techniques, given that unionized labor would produce it (Haber/Levinson 1956). Thus the decline of

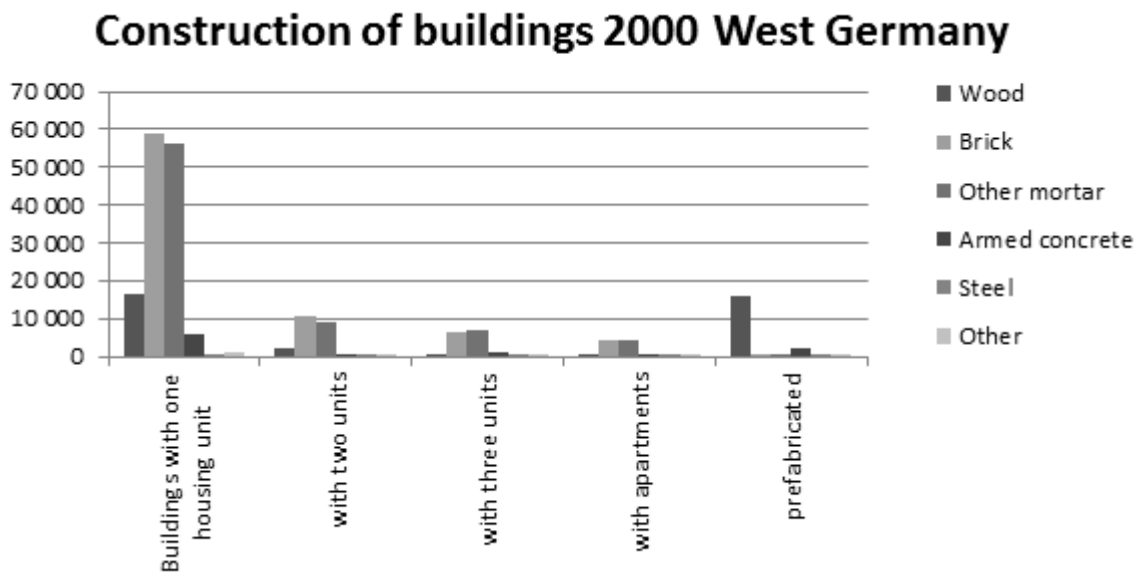
unionization from slightly less than one-half in 1966 to less than one-third in 1984 and less than 15% today did not necessarily affect the *residential* sector significantly because the merchant builder and homeownership phenomena had already taken place prior to the decline (Allen 1989:24)(Current Population Survey).

Secondly, the suburban location did not only allow for the purchase of entire tracts, the possible evasion of unionization but also of municipal building codes, thus allowing for more liberal use of prefabrication (Haber/Levinson 1956:138) – in wood or in concrete slabs (Gans [1967] 1969:38). The provision of individual parts in turn was sometimes vertically integrated, but more often bought in bulk at cheaper prices circumventing middlemen. The new production technique allowed for considerably lower production cost and prices, making the new homes available to much larger strata of the population. In fact, the merchant builders normally occupied the standard quality segment of the market, whereas the more artisanal-labor based contractors served the upper higher-quality segment (Maisel 1953:28). Standardized versions of the houses were even sold beyond single regions, with electrical heating and cooling systems making the products independent of local climates (Rome 1994).

Thirdly, merchant builder were endowed with much more capital that either came from their higher age as construction companies or from outside investors turning into the profitable merchant building (Maisel 1953:105); in the 1960s, the big American companies also purchased or held stocks in merchant building companies which had gone public to expand their capital stock (Eichler 1982). Finally, in contrast to smaller ones, the merchant builders operated a small administration with clear ex-ante planning, cost control, working time measurements, marketing techniques and direct inclusion of mortgage-credit departments, helping clients to obtain private SLA- or other mortgages and apply for the FHA or VA-insurance of the mortgage (Maisel 1953:161).

Most of the new residential buildings followed the resource path taken in the direction of wooden residential construction of low-rise structure in spite of the rise of new materials. In 1993, the US produced 14 times as much sawn wood as bricks for construction, whereas in Germany the relation was 1:1 (UN statistics) and especially for the German one-unit buildings the majority of new constructions has been in solid construction.

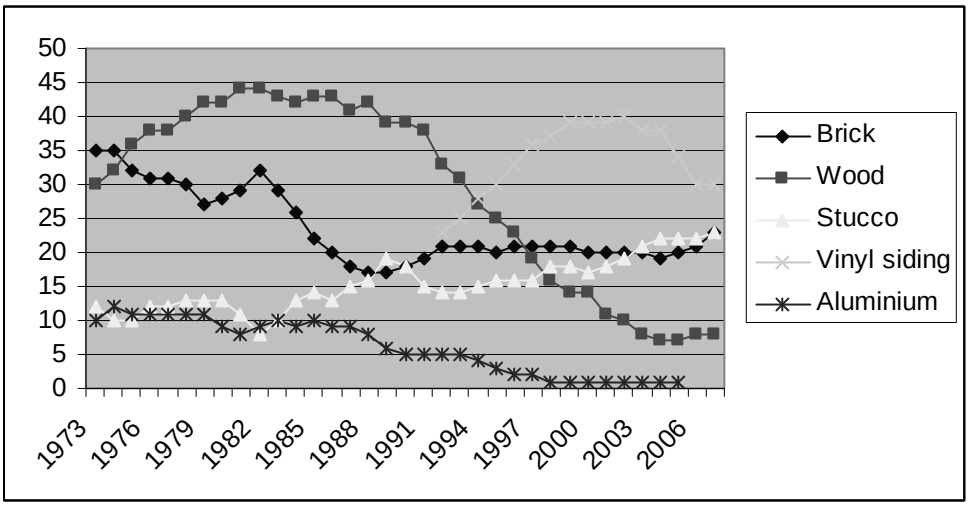
Figure 23: German building 2000 construction by primary material used



Source: (Destatis 2010)

In the US, to the contrary, the lumber-path has been followed, most recently extended by the lumber-imitating, more weatherproof vinyl sidings. Homebuilding is therefore still one of the main demand constituents for the generally homeownership-friendly wood-working industries. "Overall, residential construction accounted for roughly 36 percent of the annual consumption of lumber in the United States and 38 percent of the annual consumption of plywood" (Rome 1994:419).

Figure 24: Percentage of new construction according to primary exterior wall material:



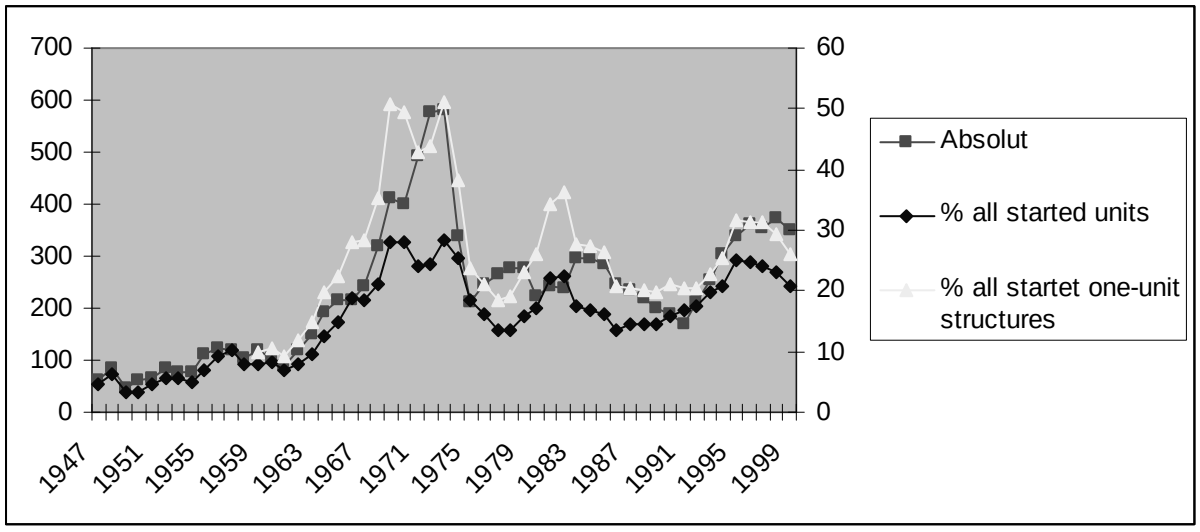
Source: Census

Historically even higher percentages of up to 70% led to a strong lobbying involvement of the lumber industry for the single-family homes as building type (Dean 1945:35). The 1902 founded National Lumber Manufacturers Association participated actively in Hoover's Own-

Your-Own-Home campaigns in the 1920s, distributed free home plan books for (self-)builders and offered a building code service to municipalities in order to permit also low-cost but yet fire-safe workers' housing and collaborated with the SLAs (ibid. 37). In the 1930s, it became member of the pro-private-real-estate coalition lobbying against public housing.

The tendency towards a mass provision of single-family homes did not only occur in the large-scale subdivision and on-site production of largely individual houses out of largely prefabricated parts but probably found its epitome in the rise of the manufactured, or mobile, home industry whose foremost characteristic is the construction of transportable, 100-percent prefabricated units with minimal necessary on-site installation work. In the second half of the 20th-century, the initial postwar production of less than 100.000 annual units increased to a maximum of almost 600.000 in the 1970s or over 50% of all single-family home production, averaging an annual contribution to the housing stock of more than 15% amounting to about 8% of today's housing stock. In both absolute and relative terms these figures are significantly higher than the German prefabricated housing sector which moreover corresponds rather to the industrialized American on-site producers in degree of prefabrication.

Figure 25: Absolute (1000s) and relative numbers of housing starts of manufactured units



Source: (Snowden 2006d; Snowden 2006c), own calculations

The sector has its origins in the production of trailers for recreational use in the 1920s which turned into housing units for migrant workers and elderly in the Depression. "By 1936 more than four hundred manufacturers were producing forty thousand house trailers per year; trailer coach manufacturing was reported to be the fastest growing industry in the United States" (Bernhardt 1980:29), with companies coming from the automobile or aircraft industry. The war- and post-war years witnessed a breakthrough of the industry as both the military and armament industries relied strongly on ready-made houses, making the former trailers an acceptable form of primary residence also for non-recreational purposes, living up to modern

standards of size and equipment. “By 1953 the transformation to primary housing was complete: Almost two million Americans lived permanently in more than seven hundred thousand mobile homes” (ibid. 30).

The move from the yearly 100.000 units to the 1970s 600.000, however, was nothing but natural and similar obstacles like those present in Germany had to be overcome, notably the mobile homes’ image of low-income trailer parks, their exclusion from local zoning rights, unfavorable building code requirements and their limited use as financial collateral. As they were not firmly attached to the ground, they legally did not count as realty but as personalty in the beginnings, implying exemption from real taxes and therefore not too welcoming invitations from local communities. But the assessment gradually switched to standard realty and thanks to industry lobbying a national building code plan was designed, the FHA extended its insurance to mobile home unit mortgages and local communities assigned special zones for the arrangement of mobile home parks where the majority of today’s units are situated on land rented from the local landlord-resident. The government itself only began to act positively in the 1976 law regulating minimum safety, quality standards and collateral standards for mobile homes, recognizing its function of a de-facto social housing segment. Mobile homes have thus become an accepted form of lower- and lower-middle class form of living, according to surveys, with relatively high durations of tenure (Fehl 1988b:597; Olsen 1997).

Not surprisingly considering their origin, the mobile home producers successfully reproduced the automobile production systems with few production of parts in the assembling-only factories, their shipment through specialized logistic companies to often dependent dealers with connections to the local market and building code. The industry structure is more similar to the automobile industry in concentration than to the conventional on-site building industry and has been growing over time. Whereas the largest 10 on-site building companies had a market share of 6,8% of 1,15 million units, their mobile home equivalents attained 50,2% of 496.570 units in the 1980s (Fehl 1988b:594).

Both tendencies towards industrialization – prefabricated on-site and mobile home production – have in common that they have to rely less on skilled organized labor, that they forgo some of the traditional building trade production structures and that they decreased the housing production costs thanks to economies of scale and scope. The two forms do not enter much in direct competition due to different target groups and with mobile home manufacturers rather serving markets outside the urban centers where on-site merchant builders have advantages.

To summarize, the residential construction regime of the US has successively produced housing commodities that are much closer to classical mass markets than the German artisanal production of single-family houses. That regime is characterized by a tendency to larger

production units, both for on-site as well as the factory-producing companies, more standardized products involving more capital and lower skilled labor in a wood-dominant technical culture while reaching down to the lower end of the mass consumers. This is opposed to the stronger crafts-dominated custom-built construction regime of more solid and generally more expensive houses in Germany, where individual houses remain in the domain of status goods.

Conclusion

When explaining the high American HR, standard answers tend to refer to cultural property preferences or to the spread of mortgage finance and the financialization of the 1980s. Almost all answers start their story with the government's multi-faceted housing policy intervention and its effects after WWII. This part II alone, as by-product of the international comparison, should have revised some of these views. First, crucial increases in homeownership took place in historical contexts of housing shortages where rather the housing supply and not preferences for one or the other housing form were of prime importance. The American preference for homeownership is moreover distributed quite differently according to the historical contexts, its middle-class version being born only around the penultimate century's turn. Most defeating, however, German immigrants' preference for homeownership seems to have overridden almost all others', including natives' HR, in spite of more unfavorable economic circumstances. Secondly, what concerns the mortgage expansion, the US does not enter the 20th-century with a highly developed mortgage banking economy when compared to the large German mortgage stock banks and the dense net of savings banks. The difference lies therefore rather in the *type* of banking institution that emerged not the *amount* of mortgages it lent. With this regard, the American SLAs were indeed a type of bank dedicated to homeownership much in contrast to the income-yielding-building preferring German mortgage banks. Finally, if anything, the above should have made plausible the idea that not even the New Deal housing intervention was the beginning but the continuation of a path of real estate institutions more generally, reaching down to the physical building stock, which largely determined the 20th-century course of the story of housing.

Part III. Hybrid France

France is a case in between the previous two extreme cases that stand for the contrast of Anglo-Saxon and German-speaking homeownership worlds. Its hybrid status is quantitatively expressed by a constant homeownership gap between Germany and France that grew through the 20th-century to the point where France moved closer to the Anglo-Saxon rate of homeowners (see Figure 1). This chapter intends to show to what extent the main aforementioned causal factors found for the other cases are realized in the French case to explain both the deviance from the German and the American ideal cases. On the one hand, French cities participate in the century-grown traditions of denser European cities with multi-story building types, mortgage bank financing and social housing tradition in the absence of early building societies. These factors explain the higher rate of multi-family dwelling units in French cities as well as its considerable share of non-profit housing units. On the other hand, its weak municipalities with regard to land and building control, a homeownership-supporting labor movement, early state support for individual worker mortgagees and mass-producing housing firms were among the homeownership-furthering factors reminiscent of the American case. With respect to apartment-ownership, French cities actually came to resemble southern European ones showing more division of formerly rental buildings into separately owned, often owner-occupied units (Allen 2004:24). The chapter takes up the different factors in turn: the historically developed urban form (1.1), the housing finance institutions (1.2) and the construction industry development (1.3). I argue that these factors and not some difficult to grasp French homeownership-culture is crucial for explaining the case of France. These factors also explain the puzzle that haunts defendants of the theory that larger welfare states go along with low HRs: Germany and France, two countries of supposedly similar corporatist welfare-regime, ended up with different HRs.

1. The heritage of the *Ancien régime*

France inherited an equally well-established system of cities as most of Europe in modern times (Le Galès 2002:37). Absolute kings still designed and founded some new cities for governmental, commercial or representational purposes and the early industrialization created industrial towns out of small villages; but overall, the once-built network, partially of Roman times, supported by geography and transport networks, merchant relations, the church and other organizations, with Parisian primacy, lived through the changing economic and demographic trends with remarkable stability (Roncayolo 1983b). French medieval cities had developed similar institutions of urban self-governance as elsewhere, even though an equally strong

tradition of autonomous merchant cities such as in northern Germany or Italy were lacking. The early nation-building and strong centralized power left its mark on French cities, which were stripped not only of many revenue and administration competences, but also of one of the foremost symbols and literal bulwarks of local autonomy, namely city fortifications.

About a century following the UK, in 1604, Sully proposed to Henri IV a plan to seize urban fortifications and to replace older ramparts of frontier towns by the newly developed polygonal bastions. The wars of religion with deviant cities such as La Rochelle hiding out behind their almost invincible fortifications gave further motive to dismantle the fortifications of non-frontier cities in the so-called "grand rasement" (Wolfe 2009:136). "In his celebrated Avis au Roi of January 11, 1629, Richelieu called for the demolition of fortifications except those along the kingdom's frontiers" (ibid. 139), a plan that was further pursued by Vauban under Louis XIV who intended to defortify two of three cities in France, constructing 160 city fortifications and nine new defense cities in the so-called *ceinture de fer* (Sanger 2000). "Open, village-like cities but closed, fortified national frontiers: this was the essence of the French Crown's policies under Louis XIV" (Mintzker 2012:49). Within France, therefore, the sprawl of cities has often not been physically obstructed from a very early time onwards; in the frontier towns, on the other hand, though military prescriptions prohibited settlement in the suburbs from the 16th-century onwards, they were gradually overstepped, renewed and overstepped again (Sellier 1921:13f); the urban fringes became a heterogeneous location for tax-savers of all sorts, industry, bars and undesired citizens (Merriman 1991). The long-term influence, however, of the fortified frontier is still visible by physical remnants of city walls or the circular form of urban streets or public transport lines and denser city shapes.

Besides the general city structure, French cities also inherited a tradition of rental buildings already prior to the 19th-century urbanization, i.e. both the form of tenure and the type of buildings were no recent innovation. Beginning with the urban Renaissance in the 11th/12th-century, cities slowly became independent of the fief system under which their inhabitants paid ground rent to noble landlords and until the 18th-century, they established a majority of urban rental housing with construction for profit and short-term rental contracts (Topalov 1987:44ff). Before this transformation – urban so-called *alleux* aside – noblemen leased the urban land on which merchants or tradesmen built their houses. The ownership title of the land was separated from the one of the building and the latter could be freely rented, sold or – as commonly the case at first – owner-occupied. Only transaction taxes had to be paid in these cases in addition to the general land rent (*cens*).

From the 14th-century onwards, however, the fiefs themselves became tradable and thus urban capital could not only buy itself free from the *cens,* but could also begin to acquire rural

property. Whereas in England the division between urban land and real estate property remained intact, in France either the tenants bought up their land property or the land owners themselves took possession of the land. In both cases a new urban *rentier* class, merchants or early industrialists, came into being that lived on rent income and constructed not for its use, but for profit (ibid. 64). Throughout the 19th-century this class was to increase its urban real estate holdings at the cost of existing owners, usually tradesmen or shopkeepers (Daumard/Codaccioni 1973). A quite circumscribed grand bourgeoisie came to own large parts of the housing stock, for instance 5% own 87% of urban property values in Lyon in 1847, whereas the remaining holdings are very fragmented (Topalov 1987:95). Precise numbers of the overall land property distribution before the Revolution are not easy to agree upon, but a rough guess is that the clergy owned 10%, noblemen and bourgeoisie each 25%, peasants roughly 33% and collective property amounted to 5-10% (Moncan 2002:33; van den Heuvel 1982:42). Urban property, depending on the type of propertied class in the city, was in the hands of noblemen, merchants and artisans who gradually lost shares to the rising new bourgeois classes; in 19th-century Paris, about 10% of the population were *propriétaires* and *rentiers*, mainly living from urban property holdings and financial assets, respectively; in a sample of central-Lyon rental buildings, the share owned by these social groups increases from 50% in 1869 to 74% in 1911 (Bonneval/Robert 2013:39).

But not only the form of tenure but also the multi-story *building form*, even constructed by speculative builders, was known under the *Ancien régime* (Chartier/Neveux 1981). In the royal city constructions or extensions such as in Richelieu, Versailles or the Place Royal in Paris, individual lots were usually leased at subsidized rates to the better-off to incite settlement and private building construction which had to be undertaken according to prescribed housing types, mostly identical, symmetrically arranged row-houses of at least two or three stories and simple monotonous façades. As these new buildings attracted the better-off as compared to the ever denser core city, urban flat-living and renting became an accepted form of residence. Contrary to the British nobility, mainly residing on and developing rural estates, French aristocrats typically had a luxurious *hôtel particulier* at their disposal in the cities and thus set a different living-standard for the rising bourgeoisie than did the suburb-inclined British counterparts who in turn set the esthetic example for their (ex-)colonies (Lichtenberger 2002:200). The often luxurious apartment housing stock that French cities inherited in the 19th- and 20th-century can also be seen through the fact that during the interwar years much new housing units were created through mere subdivision of existing ones: in all large cities (excluding Paris) the number of rooms per housing unit sank from 3,20 to 2,95, in Paris from 2,7 to 2,4 (Croizé 2009b:122). An urban class of bourgeois – following as in other regards their noble

predecessors (Hoffmann 1963:4) – therefore constituted both demand and supply. Landlords often rented themselves (Perrot 1956:84) – for rental flat-living in central cities.

Whereas walls, building types and tenure constituted the *urban* heritage of 19th-century France, the particular rural culture of small properties should not be left unmentioned as the division of France in many small parcels, a heritage from both the Revolution and inheritance law, provided for easier access conditions to owner-occupied housing in later times. Scholars usually disagree about the degree of continuity or discontinuity between the pre- and post-revolutionary regime. As to the distribution of property, one is relatively safe in claiming that continuity dominated though until today the precise distributive effects of the Revolution on land property is still an open question and the way it is answered oftentimes reveals more about historians than about history. Revolutionaries' interpretation of matter credited the Revolution with having considerably increased the number of landowners (cf. Jaurès 1901), whereas Tocqueville claimed quite the contrary; both claims are certainly true when one distinguishes the quite different regions. Some uncontested results seem to be (Boudinier 1999; van den Heuvel 1982): roughly 10% of the country had changed hands; urban bourgeois had appropriated considerable large rural properties; noblemen had, by the 1820s, regained large parts of their pre-revolutionary property; a small class of large farmers developed; possessing farmers both small and large could extend their possessions; some small farmers could acquire their own land. Also, throughout the 19th-century, the rate of rural property owners increased to more than 80% in some regions such as the North-east; it did so by replacing the métayage system (Laurent 1988) and by dividing existing property. Reliable numbers are not available before the advance of the Napoleonic land register, but the number of parcels increase from 10,2 Mio. in 1826 to 14,3 Mio. in 1881 with the average size falling from 4,48 ha to 3,5ha (Barral 1968:24); the number of small farms was even higher as big landlords oftentimes leased their land in parcels. The number of large agricultural firms decreases over the century, while Foville estimates that the number of French property owners rises from 6,5 million in 1825 to 8,5 million in 1896 (Michalet 1968:115), with 7,8 and 11,4 million households, respectively (Insee). A main driver behind the increasing parceling and diffusion of small ownership was probably the partible inheritance law in the Civil code which provided an equal share for all legal heirs (Beckert 2004:54); although one clause considered landed property to be possibly exempted from this practice, courts seemed to have applied the division-principle quite strictly and, while small parceling had already been a pre-Revolution phenomenon, reformers such as LePlay made the inheritance law responsible for further land fragmentation in the 19th-century (ibid. 59).

A social concern for the small-property-owning peasant had already surged during the Revolution, when the expropriated ecclesiastical and emigrants' lands were to be sold, not only to fill the state's coffers, but also as a means of social policy. Thomas Paine and Babeuf had brought in the idea of an equal distribution of land, serving a kind of basic social income (Vanderborght/Van Parijs 2005). The various changes in the design of the auctions during which the land was sold reflects the social struggle between bourgeois purchasers, fiscal revenue interests and the desire of more equal land distribution (Clemens 1995:25f). The focus on the small rural property Frenchmen became one of the guiding policy lines throughout the 19th-century. Napoleon III is usually attributed the strategy to have enlarged the electoral base in order to counter the opposition of established interest by drawing on big rural France (cf. Marx [1852] 2007:118ff). When the Empire fell, Republicans discovered that it was part of their job to convert "peasants into Frenchmen" (Weber 1976). The large number of rural peasants was behind the many obstacles put in the way of urban reform, including housing reform, in French 19th-century cities and the introduction of protectionism was also led by social policy concerns for the rural regions (Aldenhoff-Hübinger 2005). The rural small-property tradition did only provide more people with access to at least some piece of land; it might have also raised certain expectations of migrating workers in times of later urbanization.

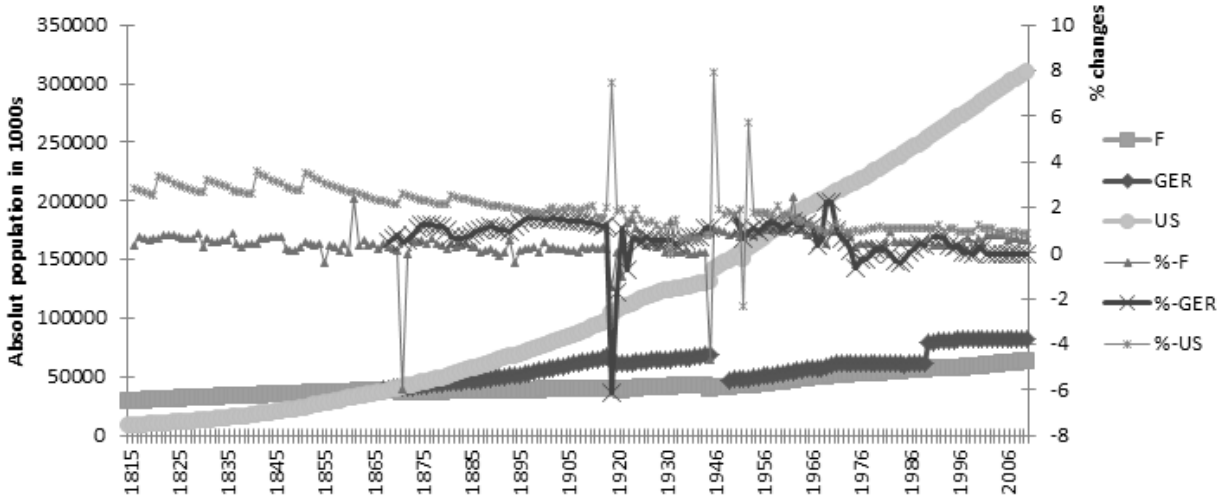
To summarize, French cities entered the time of stronger urbanization inheriting similar features of the compact tenant-city as Germany. Absolutist planning, implying rows of tenements along thoroughfares, even originated in French royal city constructions. As shown in the German case, these features were likely to create a building-structure heritage favoring lower HRs in the 20th-century. Unlike German cities, however, French cities were liberated from physical growth traditions from above and were generally granted less autonomy in managing local affairs, thus privileging a mode of urban expansion in form of uncontrolled small properties that was further enhanced by more a more widespread tradition of small farming property.

1.1 Lagging municipal reforms

Not only did French cities enter the 19th-century with less feudal encumbrances, yet a paternalizing central state and a small property tradition, but a number of later factors made them also take a different path in favor of more lower-rise, potentially owner-occupied building structures in the long 19th-century. After the industrialization-related urbanization waves had swept over European cities by the interwar years, urban France, counting more than 50% of the population by 1931 (Fohlen 1980:105), was left with significantly different cities than her German counterparts. Several factors can account for the initial difference of urban form.

First and foremost, the economic and demographic developments made France an early industrializer with initially some large cities, but little population and urbanization growth thereafter (Bairoch 1988:215, 261). Major moments of urban construction growth occurred mainly in the north-eastern and Mediterranean regions in the 1850s, shortly in the late 1870s and 1920s and extensively in the 1950s (Flauss 1949). France is historically singular in her demographics because between around 1840 until 1942 her population and housing stock growth were extremely modest compared to both neighboring and other advanced capitalist countries (Cahen 1957). Without the immigration of foreign workers coming from Belgium, Portugal, Italy and the colonies, the population would likely have decreased.

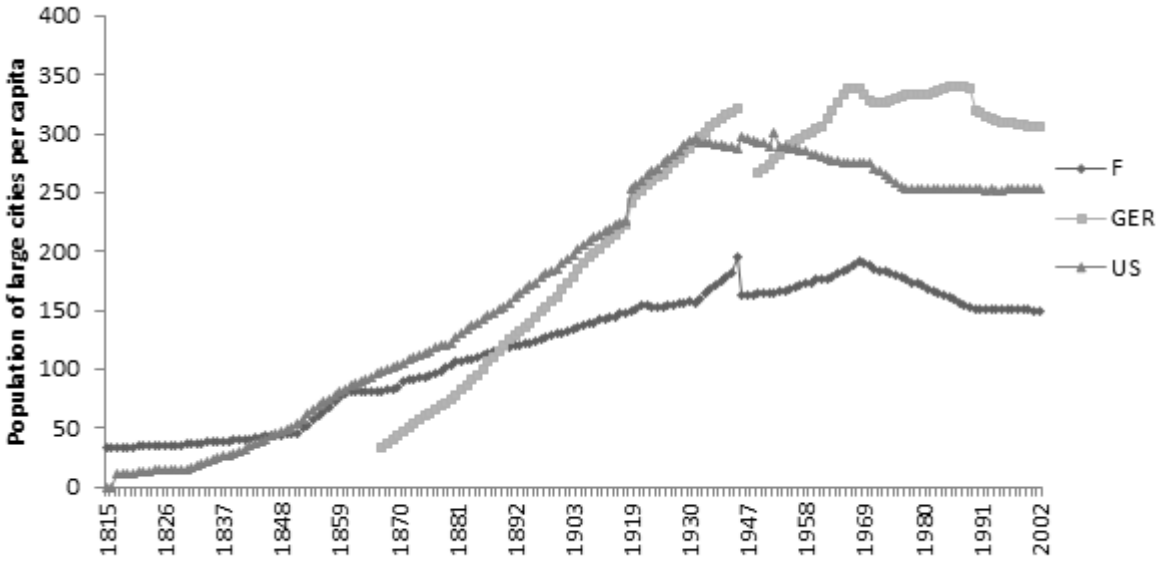
Figure 26: Demographic development



Source : (Banks/Wilson 2013)

The population did not only grow slower in absolute numbers from 1870 onwards, but the relative growth of the urban population went also at a slower pace. Existing urban communes expanded rather than rural communes turning into urban ones (ibid. 992). The number of people living as *population éparse*, i.e. living in disconnected housing units, fell from around 13,5 Mio. in 1872 to around 11 Mio. in 1954; in general, the absolute rural population in the 19th-century even declined (Weber 1899:68).

Figure 27: Distribution of the population (%) according to the size of communes



Source: (Banks/Wilson 2013)

Although urbanization in France, as compared to Germany or the US, began early, it was less important and less steady later on, making France until the end of WWII still a quite rurally populated country. In 1911, there were 16 cities of more than 100.000 inhabitants in France with 7,4% of the population (without Paris), but more than 40 in Germany containing 18,1% of the population in 1910 (without Berlin); under the primacy of the French capital which housed as many people in 1911 as all following large cities together, an equilibrated system of middle-sized regional cities of the necessary minimum size for certain infrastructural investments hardly emerged (Flora et al. 1983b). According to the traditional definition of urban as being a commune with 2000 or more inhabitants, the urban population crossed the 50%-line as late as between 1926 and 1931 in France, while the same occurred between 1890 and 1895 in Germany (ibid.). Taking available numbers of the 103 largest French cities between 1886 and 1936 yields a population growth of 64%, while, for available data of the 91 largest German cities, the growth between 1880 and 1939 amounts to 336% (ibid.).

Besides less demographic pressure on cities, the broader rural small landownership due to partible inheritance law (Beckert 2004:62) and the encompassing high prestige of land, less rapid growth of industrial capacity (Bairoch 1982:295), more rural industrial settlements and generally more decentral middle-sized firms and self-employed inhabitants (Kaelble 1991:29f) can be considered causes of the slower pace of urbanization in France.

A side-effect of this Malthusian demographic development was a strong conservative-minded pro-natalistic reformer movement that came to influence political circles between 1890 and 1940 (Rosental 2010:19). With Germany's demographic explosion and the imminent danger of

war, the *Alliance nationale pour l'accroissement de la population française* (1896), whose president was the founder of 1891's Paris' housing statistics, Dr. Jacques Bertillon, and the *Ligue pour la vie* (1916) pointed particularly to housing conditions as one of the causes for France's demographic and military decline. On the one hand, Bertillon produced series of statistics suggesting negative correlations between overcrowding and the number of children or the mortality per building (Bertillon 1911:168); correlation between population density and occurrence of typhus (Bertillon 1883:30) or tuberculosis (Cotterau 1978) pertained to the stock of common hygienic explanations. Not only were housing conditions therefore said to produce fewer and less sound children, but, on the other hand, they were also considered to prevent families from having more children. Landlords' rejection of large families was a much lamented, yet commonplace phenomenon and rental housing units with numerous rooms were not produced for the market. Not surprisingly, therefore, natalist reformers opted for the single-family home outside of the fertility corrupting cities as panacea and the natalist and housing movements became closely interlinked, both in ideals and personal networks (Frouard 2010:18). The state-supported housing associations, the *habitations à bon marché* (HBM), producing for large families came to receive preferential attribution of credit and exemptions for housing construction by municipalities from 1912 onwards, by the state from 1919 onwards, constituting only of the many preferential treatments improving large families' purchasing power (Lénoir 1991:149); the family wage and redistribution to families via the *Caisses familiales* were probably among the most important, the latter can also be considered as a rent-subsidy equivalent out of which grew indeed the housing allowances in 1949. Until 1927, half of all state support for HBM went into large-family specific housing constructions (Frouard 2010:120). Only in 1971 did the housing allowances broaden their previous restriction to families. In sum, the demographic development which itself was said be caused by the partible inheritance law and small-property imposing Malthusianism thus impacted directly on cities by letting them grow without predominant rental barracks and, indirectly, by producing a reformer movement that sought to further homeownership through the first housing laws of the 1890s.

The existing demographic pressure on the set of larger French cities was met by traditionally weak municipalities which moreover developed more slowly – or not at all – the new institutions of urban government such city-planning and building codes, municipal enterprises or land banking. Throughout the long 19th-century the different central regimes had reasons to remain in fear of municipal autonomy. Beginning with regional revolts during the Revolution, there were continuous local uprisings, from the city-occupying strike in 1831's Lyon or the proclamation of independent Communes in 1871, until the rise of social municipalism by the end of the 19th-century with roughly half of the major cities in hands of left-wing mayors by

1914. As a consequence, financial and political powers granted to municipalities remained limited and the lack of municipal land and housing policies allowed for uncontrolled low-rise urban development in the outskirts. Expenditure of French local governments between 1882 and WWII strongly oscillated between 10% and 30%, whereas the German numbers were persistently between 35% and 40%, Anglo-Saxon ones even higher (Flora et al. 1983a); on the income side, the French central government persistently collected more than 80% of tax revenues, while the German numbers only climbed to around 60% in the 1900s (ibid.).

Most modern institutions of urban governance had in principle been codified by the time of Napoleon and even reached back to absolutist city planning, with the edict of Sully from 1607 prescribing orderly buildings along the publicly determined street lines (*alignements*) to be requested by permits (Sutcliffe 1981:128). A Revolution-law of 1790 extended the permit-requirement to the whole of France (Raymond 1966:14), but even the tightened hygiene requirements of the 1902-law were continuously circumvented until 1912 by building along private streets or, as in the case of the chaotic suburban settlements, by building without any street at all; the permit and thus new building control did not become effective before 1943. Although in Paris traditional building codes regulating heights and façades had an equally long tradition as the alignment-plans, they remained for a long time a mere side-product of street-planning and could not be effectively controlled through the permit-system (Fisch 1989a:245).

In 1807, Napoleon passed a swamp-clearing law anticipating most modern methods of urban governments including expropriation for public utility with experts determining the compensation payments, the taxation of betterment value and the requirement for municipalities to design street plans (cf. Frouard et al. 2011). These planning regulations were ironically taken up by the occupied German provinces but did not become realized in France prior to post-WWI (Sutcliffe 1981:129). Additional laws concerning expropriation in 1833 and 1841, for instance, replaced expert juries by commissions of property owners which were usually inclined to determine quite generous compensation payments for municipalities that mainly lived on indirect consumption taxes and custom duties.

Finally, the most frequent mode of local enterprise management in France remained the private license system in which private companies were commissioned to provide certain services in long-term contracts. This absence of municipal enterprises on a wider scope, frequently backed by restrictive rulings of the *Conseil d'État* (Martin 1979), withheld from cities an important planning and revenue-bringing device, while it allowed at the same time for more leeway of new settlements because the municipalities did not have to assure the necessary public infrastructure in advance. Municipalities largely abstained from any land-banking activity and incorporated suburbs much less aggressively than in Germany, leaving France with roughly the

same number of independent communes as in the 19th-century. Overall, French cities prior to WWI were still rather assemblies of local honorary citizens than local governments, with private philanthropy and church welfare still being major welfare providers (Smith 2003). This form of urban government channeled city growth rather into the form of low-rise suburban settlements than in the organized extension of new block developments.

It should not surprise, therefore, that municipal housing policies were practically non-existent in pre-WWI French cities but for private philanthropy and the traditional charity system, until the 1912 Bonnevay law extended the state credit to municipal and departmental housing authorities that became practically relevant as late as the 1920s. The constructions through foundations such as the Rothschild's in Paris served the role of model housing and usually consisted of reformed urban tenement constructions, though overall limited in number. The traditional charity system was composed of a mixture between Catholic, Ancien régime and Revolutionary institutions – hospices, hospitals and welfare bureaus – which provided basic shelter for the urban poor, often the elderly, or even paid small rent subsidies.

Besides lacking funding from above, the liberal factions in the municipal councils were also a persistent veto-player against any housing involvement by French cities. In the 1880s, times of private construction crisis and the return of socialists to France, the Paris Municipal Council discussed at length the possibilities of housing interventions, but the approximately 400 propositions made remained without any result (Lambeau 1897). The liberal-anti-interventionist- and conservative landlord-coalition could apparently prevail using the following arguments: municipal housing construction would lead to budget excess like those under Haussmann, especially when new land on the outskirts had to be bought, where moreover no transportation of workers would be provided for; this periphery-construction would furthermore lead to a "cinture rouge", therefore mixed rental housing with architectural segregation within the houses, if at all, would be preferable. Arguments against *state* intervention were even stronger and relied upon a general fear to be once more economically or otherwise dominated from above.

The repression following the Commune of 1871 had weakened the left-wing parties that were not to re-emerge prior to 1882, from when on, however, they had a much stronger voice in city-councils than their German counterparts. Between 1892 and 1914, socialists were in minority or majority governing in a dozen mainly industrial cities which, however, did not necessarily lead to more municipalization (Smith 2003:40). One of the reasons behind this apparent paradox lies in the ideological fragmentation of French socialists where the municipalization supporting Broussists made up only one of the several fractions. Even in a reformer city with left-wing government such as Lyon, public housing did not appear on the political agenda prior

to WWI (Smith 2003:161). Anarchical movements, for instance, retreated to support for needy renters by organizing clandestine moving before rent-payment day, revolutionary renters' committees or by publicly denouncing landlords (Kamoun 2000:38). Another reason just lay in the generally restricted leeway French communities were given from above, with the electoral system privileging the less populated rural communes in the national chambers which opposed any reform bill that would require more competences and tax money for the cities; the *Conseil d'État*'s narrow interpretation of the 1884 law about municipal competences went into a similar direction (Kühl 2001). The housing bill of the 1900s, for instance, could only be passed by insisting on subsidies for both urban and rural housing units. Finally, the socialists, once in municipal power, struggled with the already mentioned structural deficits, such as understaffed or lacking professional city administration, much more so in industrial cities of recent growth such as in Saint-Etienne (Lorcin 2001).

This general lack of municipal capacity, competence and enforcement power, leaving the growth of cities largely to private construction, witnessed a short interlude during the Second Republic and Empire when a vivid housing debate and authoritarian city building made French cities, under Paris' lead, temporary international spearheads of urban reform (Pinkney 1972). In the Second Republic's debates the basic repertoire of modern housing policy option had already been presented by either Fourier-disciples or Bonapartist philanthropists (Guerrand 1987:64ff): the *Assemblée constituante* decided in 1848 to exempt new housing construction from direct tax payments during ten years and Parisian construction should even receive a 6%-credit by the newly established *Sous-comptoir des entrepreneurs*. The construction industry should help occupying the unemployed – the "Quand le bâtiment va, tout va" slogan is reported to date from this time; Considerant proposed in vain in 1849 to finance state housing construction in the Fourier style in the same manner as the state employed the many unemployed in the national workshops at the time (Bullock/Read 1985:293); in 1849 a similar suggestion supported by Napoleon – inspired by Robert's *The Dwellings of the Labouring Classes* during his British exile – was eventually granted: funds of ten million francs gained from the expropriation of the Orleaniste fortune were to be used entirely for welfare and housing purposes. Eventually, not more than four million francs were given to both the Mulhouse society and to the *Société des cités ouvrières de Paris* which by 1853 had constructed 200 housing units of the originally much more ambitious program (Flamand 1989:65). Napoleon, in a Caesarian gesture, even donated privately to the construction society building, the so-called *Cité Napoleon*. Built in the traditionally urban block structure, the resulting Parisian housing units consisted of multi-story houses grouped around an inner courtyard; Napoleon's expressed wish to extinguish pauperism through small-scale property

(Bonaparte [1844] 1848) – contrasted with the large British estates – had to succumb to urban realities in these projects which were not only criticized for paternalistic supervision and undue concentration of workers, but also for the danger for family privacy in these surroundings (Villermé [1849] 1850:8,10).

In 1850, what could be considered the first national housing law was passed which instituted a state supervision of external housing insalubrities through arrondissement-based councils and provided expropriation norms for these cases. A mandatory owners' contribution for the reconstruction of the demolished buildings as originally proposed, however, did not make it into the law. The first hygiene council had been established in Paris in 1802 and by 1848 there were 63 of these councils in France that by 1822 were nationally organized in the *Conseil Supérieur de Santé* (Bullock/Read 1985:287ff). The 1850 law gave hygiene inspectors the additional rights to declare a building as insalubrious which made demolition at the landlords' expense possible. As most anti-landlord laws in the 19th-century, however, the law was not thoroughly applied. By 1882 a hygiene commission existed in only four cities (Baudrillart 1889) and further urbanism had to await the hygienic movement and the *Musée social* efforts whose legislative efforts in the 1880s were rewarded by a more powerful hygiene law in 1902.

While these law initiatives mostly fell prey to prevailing state, rural and private property resistance against modern urbanism, the city of Paris under the newly assigned prefect Haussmann backed by the Napoleon III and his Imperial plans for the capital himself, largely renewed the city housing stock and infrastructure, in the course of which sewage-connected, typical 5-6 story rental buildings of identical types along thoroughfares and parks came to replace labyrinth-like medieval old towns of doubtful hygienic conditions. The plan to remodel Paris along these lines had already been born in the 18th-century, concretized by Napoleon I and undertaken by the prefect Rambutau (Gaillard 1977:39). But only Haussmann disposed of the legal expropriation capacity, authoritarian support from above and the necessary financial and technical means to build 102.487 new and demolish further 117.553 housing units (Sowa 1991:43). By 1869, 20% of new Paris roads were Haussmann's boulevards, while the overall rent level had increased and many workers had moved to the east or beyond the city frontier (Grison 1956:63).

As a result of this Haussmannization, imitated in other large French, Belgian and Italian cities, the central-city flat-living tradition for the middle-classes was enshrined in stone as compared to the American middle-class which suburbanized in family-houses or even the German one that often settled in the new suburban rental buildings of the ring streets, while the central-city remained in the hands of the traditional bourgeoisie. The large-scale reconstruction of the central cities made the extension planning for the middle-classes less urgent and therefore

correlates stronger with uncontrolled suburban settlement in individual houses rather than planned blocks of rental buildings. With the fall of the Second Empire, the state's interests in the cities and the lead of French urbanism with its strong legal instruments declined. Whereas ambitious plans for the renewal of inner cities had been elaborated and executed, planned city-extensions such as Tony Garnier's under the reformer mayor Herriot in Lyon remained the exception (Lampugnani 2010:68ff). The major population growth of cities was absorbed by small add-ons or upgrading of the existing stock and the uncontrolled layering in the outskirts.

In spite of the 1919 law Cordunet obliging cities to draw city plans, the interwar years witnessed a continuation of uncontrolled suburban settlements which eventually received the attention of the national legislator in the 1920s because ongoing urbanization, speculative sale of single lots of suburban lot-divisions (*lotissements*) and improved urban transport had increased the scale of the phenomenon. For Paris alone, several hundred thousand so-called *mal-lotis* were estimated to settle in mostly self-constructed shelters, isolated of any urban services, let alone laid-out streets (Fourcaut 2000:74). A much read German visitor of the time notices the widespread land ownership in France and speaks contemptuously of Paris' fragmentized periphery (Sieburg [1929] 1954:131ff, 147). The phenomenon also gained political salience as the suburban communities changed rapidly from semi-rural into worker-dominated strongholds of left-wing parties, leading to the rise of the so-called Paris red belt and the permanent implantation of the French Communist Party (PCF) until the 1980s; in the Seine suburbs the PCF won thrice as many votes in legislative elections and gained a maximum of 27 out of 79 municipalities (Stovall 1990:170f).

Workers were attracted by stronger centralized industrial production but had difficulties in settling in the existing rental housing stock that had not grown during the years of war and which came under strong regulation concerning rent prices and landlords' dismissal rights. Those tenants lucky enough to occupy a housing unit were unlikely to move and new private constructions, though exempt from taxes and rent regulation, focused on upper-class segments or directly on apartment-houses. High interest rates and inflation created a difficult investment climate and the expectation to compete with rent-regulated units or even include new units in the regulation also made investors hesitant. Whereas some families apparently found more permanent shelter intra-muros in cheap hotels, for others the market left little alternative other than settling in one of the suburbs, to which seducing advertisement by *lotisseurs* but also their rural small-property habit led them. *Lotisseurs*, the *lotissement*-speculators, sold or rented parceled lots of land, often obliging homeowner cooperatives in sale's contracts to guarantee the legally necessary services. The cooperatives usually failed due to lacking awareness, resources and collective organization. Most municipalities themselves had neither the necessary

resources nor the planning apparatus to help out the mal-lotis; from 1922 on, these were even exempted from property taxes, which made the new suburban lots particularly expensive for the small local communities (Fourcaut 2000:151). When the first national legislation of 1924 tightened the necessary requirements for the sale of parceled land, too many loopholes persisted and only the 1928 Sarraut law brought financial support to the homeowner associations to supply the necessary infrastructure. Though the legislator, media and historians' focus was largely on the Parisian *banlieue*, this type of city growth also existed in the Provinces. "At Toulouse, typical of large cities, urban expansion was left entirely in the hands of private interests who indiscriminately bought up rural parcels along the city's outskirts and subdivided them into small, hit-or-miss suburban allotments. Families devised and retrofitted all variety of structures in the scramble for shelter" (Wakeman 1997:52).

After WWII and up to the 1970s, lower-income housing was to characterize the outskirts and interstices of French cities (Nasiali 2012). The post-WWII Castor movement, instigated by Abbé Pierre and subsequently supported by the Reconstruction Ministry in the 1950s, and the instantaneously constructed *cités d'urgence* can be considered as another chapter in the story of self-help low-income housing construction at the urban fringes (Brodiez-Dolino 2008:53ff; Wakeman 1999).

This episode of French urbanization is revealing, not only because it brought the otherwise rather noiseless process of homeownership-enabling city growth to the public's and historians' attention, but also because it refutes homeownership-explanations solely based on homeownership-desires. Much like in the American case, potential or existing tenants were rather channeled into little-to-desire forms of ownership due to a combination of restricted rental markets, lacking new construction of both private and public sort and permissive urban settlement structures. This combination of factors served functionally as an inexpensive social policy favoring homeownership – reducing central city conflicts through expansion into new space – while the explicit housing policies proposed by Loucheur in the early 1920s were not passed prior to 1928 and were then cut by the Depression. Compared to the American case, rent restrictions were much longer lasting and severe in France, with tenants paying less than 5% of their income after WWII; even the 1948 rent law, intended to bring rents back to market levels, was leniently enforced, leaving the pre-1948 rental buildings, successively more occupied by the elderly, as a de-facto subsidized housing stock (Voldman 1988). Average bourgeois budgets between the 1870s and the 1950s show a permanent decline of relative rental expenditures (Perrot 1956:158). This kind of social housing policy had the short-term advantage to be at the cost of only a minority group of landlords of not too glamorous public reputation (Michel 2006) while favoring large segments of urban voters alike, including employers who could count on

lower real wages. The long-term effect seems to have been a qualitative and quantitative decline of private renting in France and thus an indirect push-effect towards homeownership.

To summarize, unlike their German counterparts, French cities, under less demographic pressure, did not dramatically alter their traditional shape and accommodated the existing population growth in the existing stock and unplanned urban sprawl, favoring the creation of small suburban property, allowed for through weaker municipal rule over building land, housing stock and infrastructural requirements. Haussmann-like modern urban renewal, while retaining the middle-classes attached to the city unlike in the US, also meant a relocation of workers and urban immigrants to the suburbs, where workers often become small property-holders, though not necessarily out of homeownership-desire. Thus, the uncontrolled growth on the urban fringes left French cities more receptive to small property ownership than their German counterparts.

Alsace-Lorraine

An interesting case of illustration for the city-based explanation advanced here is given by the larger cities in Alsace-Lorraine which came under a 48-year lasting German rule and influence after the Franco-Prussian War, precisely at the time when urban growth and the municipal reforms occurred. Moreover, the influence of German law, particularly concerning city autonomy and planning, was not even removed after the region turned into the three French départements in 1918, leaving institutional urban legacies beyond the physical building and street-layout (Glenn 1974). In a sample of the largest urban counties in France in 2009, cities like Colmar, Strasbourg, Metz, Mulhouse or the nearby Nancy still show significantly lower HRs for the area of their traditional municipalities. Much like in the other singular historic cases mentioned – German emigrants to the US, Toronto-Montreal or Oberhausen –, Alsace-Lorraine is, of course, not a perfect natural experiment for showing that populations of traditional preferences are brought into different housing and ownership conditions by varying urban institutions, but it is probably the closest one available. After 1871, in spite of French emigration and German immigration, a part of the French population in a traditionally French region came to live under the influence of German urban institutions, in spite of them not being instantaneously and perfectly implanted.

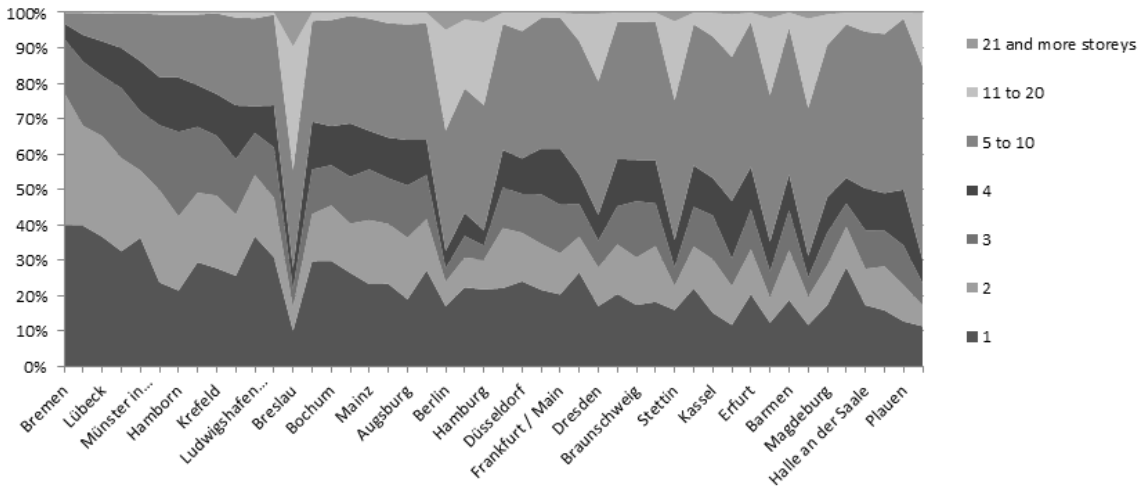
As part of the frontier defense system, Alsatian and Lotharingian cities were late in shedding their fortification rings and therefore inherited similar dense central-city structures as other formerly fortified cities in Germany. The pre-WWI population and city growth was faster than the French but slower than the German average (Wittenbrock 1989:294). The Prussian form of city-planning and building codes restricting the general liberty to construct could slowly made

its inroads in Alsatian cities through the German municipal servants who practically overtook city administrations, as local planning traditions were mostly absent (ibid. 303); even proximate French cities such as Nancy began to copy this urban planning model. Strasbourg began to realize planned city extensions and remodeling in 1907, involving the secret municipal land acquisition, lay-out of streets and establishment of urban services, architectural competitions with prescribed façade-norms as well as the organized relocation of the population in new housing units provided for by municipality-subsidized building cooperatives; the attempted extension of this Strasbourg-extension-model to Paris in the 1920s failed at the latter's restrictions of administrative leeway (Fisch 1995). Though the five largest regional cities did not develop into full-blown cities of rental barracks as known in the German east, they showed an average of 27% single-family homes and 76% of the population living in buildings with three and more units by 1918, bringing them closer to their German than French counterparts, given their smaller population (see Figure 29).

The longue durée *of the* ville basse

The long 19th-century left France with the tradition of *la ville basse* (the low-rise city) which hardly became reversed by French urbanization prior to WWII: between 1901 and 1946 the average number of housing units per building grew from 1,44 to 1,54 only, while the percentage of buildings having one or two stories even increased from 85 to 88% between 1881 and 1911 (Croizé 2009b:146, 151). These average national numbers already deviate strongly from similar German ones where prior to WWI the average number of housing units per building was at 3,8, while between 1918 and 1927 the average of the new construction of the Weimar settlements was still at 2,4, even though explicitly meant to be low-rise (RWZ 1927:37). One could still argue that the larger rural population camouflaged essentially similar urban developments. Thus, one observes for Paris that "The power of Haussmann's influence is visible in the proportion of tenements of five and more stories that rises from 28% in the 1866-census to 47% in the 1926-census" (Croizé 2009b:151). But at the same time, these suggesting figures still disregard the 21% of all buildings with ground floor only in Paris and the excluded suburban low-rise developments. With more than 50% of more-than-four-story buildings being situated in Paris (Croizé 2009a:3), Paris' housing stock, however, constitutes a similar exception as the NYC in the US. In fact, the city's 1926 building structure approximates the typical averages of German building structures, as witnessed in a sample of the 45 largest German cities in the 1927 housing count:

Figure 28: Buildings according to their number of stories in major German cities in 1927

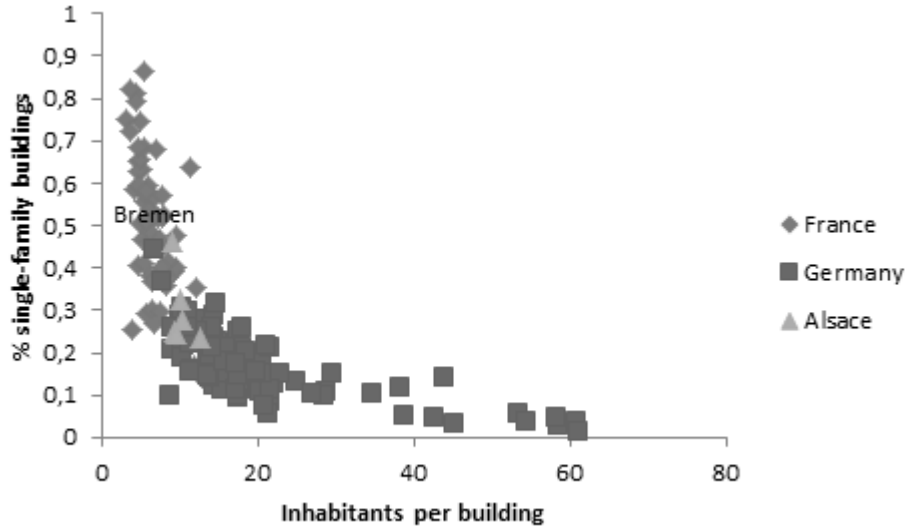


Source: (RWZ 1927), discontinuous data

Building-stock-wise, therefore, the 1920s' Paris was not at all the urban exception amongst German cities that it traditionally had been in France. In a survey about the late 1930s housing stock of all major French cities (but Paris), reflecting roughly 150 years of construction history, the *enquêteurs* even observe that the three-story townhouse constructed prior to 1850 had often been joined by newly constructed lower-rise houses; the average number of stories between 1850 and 1920 even declined due to suburban sprawl (Croizé 1986:235). Only in rare cases such as Lyon, Nancy or Grenoble did rental barracks containing more than five housing units and more than three stories made up more than 10% of the housing stock; only in these cities do less-than-three story houses amount to less than 80% of the stock, everywhere else do they reach levels of even up to 100% (Croizé 2009b:154).

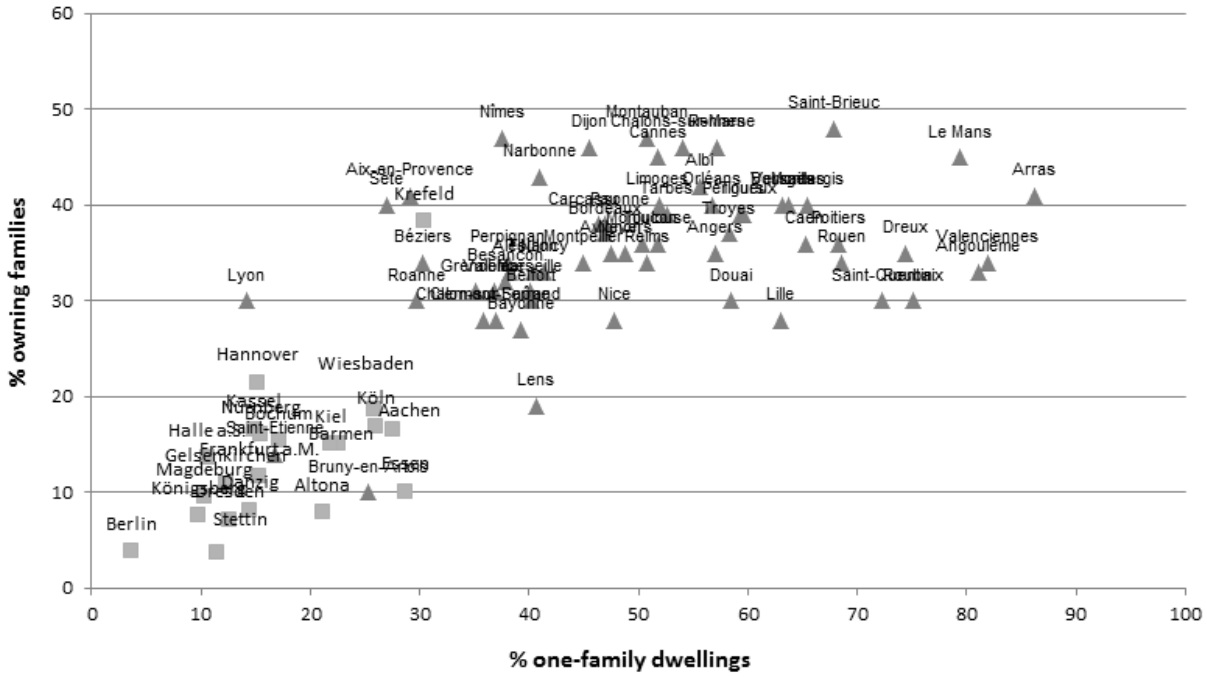
The unique historical survey allows revealing comparisons with German cities with respect to their housing stock composition after the first urbanization waves had swept over the countries. The 1918 housing count is chosen for Germany as it does not strongly differ from the 1927 while still containing the Alsace-Lotharingian cities whose data were lost in the French survey; at the same time, the later French survey also allows to control for France's slower urbanization. With respect to all possible housing indicators such as homeownership, low-rise building structures or single-family houses, French and German city fall into almost mutually exclusive homogeneous clusters, with Alsatian cities mainly falling into the German cluster and with some exceptions proper such as the deviant case of Bremen explained in Part I. As the great majority of the survey reflects the historically grown, often 19th-century building stock, this strongly confirms the claim that there has been systematic difference in historic city shapes, with the French building structure showing itself more receptive for homeownership. The following visualizations demonstrate this systematic clustering for the HR, the percentage of single-family buildings and inhabitants per building.

Figure 29: Building structure in French and German pre-WWII cities



Source: (RWZ 1918; MRU 1947)

Figure 30: Building and tenure structure in French and German pre-WWII cities



Source: (MRU 1947; Baron 1911; RWZ 1918)

The lower-rise cities created a building stock more suitable for owner-occupation and are part of a physical heritage that allowed for historically higher HRs even in *urban* France, disregarding its higher share of possible rural homeowners. Another equally important difference-making institutional heritage consists in the legal appreciation of flat-ownership: though of Roman-law tradition, several French regions are reported to have known long co-

ownership customs prior to its codification in the Napoleonic Code. Customary co-ownership rights existed, for instance, in Alpine regions such as in Grenoble, but also in Mediterranean cities or Rennes where the co-ownership institution was imposed on existing inhabitants to regroup the necessary capital for reconstruction of the city after the great fire of 1720 (Raymond 1971:23), traditions still reflected in higher city-HRs and apartment-ownership rates today. The Napoleonic Code, even though constructed around the notion of absolute, indivisible property, codified separate apartment-ownership in Art. 664 in general but without offering any further specification of its execution prior to the *copropriété*-laws of 1938 and 1965 (Périnet-Marquet 2004); until WWI the *Cour de Cassation* also considered apartment-ownership as against the individualist spirit of the Code and, in spite of the supplement to the Article 2118 which allowed for taking parts of buildings as collateral for mortgages, the risk-aversive and conservative *Crédit foncier de France* (CFF) did not engage in this kind of mortgage-making (Lescure 1982:497).

These legal developments, however, were rather reflections of changing economic conditions than themselves determining factors because, without change of law, co-owned apartment-house constructions seem to have boomed beginning in the 1920s, a time when inflation haunted the Franc and rent legislation potential landlords (Michel 2006:55). Apartment-houses became a form of capital-collection through housing construction for the better-off, accompanied by revived homeownership discourses stripping co-ownership of prior communist associations (Yates 2011; Guerrand 1987). In some years of the 1920s in Paris, condominium-apartments made up 80% of the demands for new construction permits (Lescure 1992:233). About earlier developments, no precise numbers concerning the overall extent of separately owned apartments in the housing stock are reported, but it is already revealing that in 1935, prior to the first modern *copropriété*-law, 2.600 co-owned buildings were registered in Paris and 4.200 in 1950, while legally only 232 buildings were governed by the required assembly of co-owners (Moncan 2002:137). Over the second half of the century, this number grew to 50.405 or almost 50% of Paris' housing stock, while at the same time the number of buildings owned individually fell from 105.119 to 20.455 between 1935 and 2000 (ibid. 65). Expressed in housing and not building units, these numbers should be even considerably higher, as co-owned units are often found in larger buildings; overall, in 2000 the nine largest French cities showed an average rate of co-owned apartment buildings of 42%, while in a sample of the 42 largest German cities in 2011 (Zensus) 14,3% was the comparable figure.

Partially, this tendency has been advanced in France by the partible inheritance laws which produced many family co-ownerships of buildings (Bonneval/Robert 2013). Otherwise, public rent and tax policies are usually cited as reasons for the declining interest of individual

investors in rental buildings as a whole, demanding ever more management and – for the case of the pre-1948 housing stock which came under the 1948 rental law – less real rent income. There are no precise statistics about the level of conversions but it appears plausible to assume that they explain the simultaneity of large shares of rental housing units in the post-war new construction and the rise of the HR after 1945. From the late-1970s onwards, they were joined by sales of public housing units, which however did not have the same extent as in Thatcherite Britain.

While in the 1920s rent-control was legally difficult to evade through condominium-conversions, the conversion into private rental units of the legally distinct and therefore uncontrolled *meublé*-form, in spite of its prohibition of 1924, seems to have been the consequence, i.e. a kind of boarding-house hotel of more permanent cheap residence for mobile one-or-two-person households with considerable privacy concessions and subject to special police supervision; during the 1920s and up to the 1950s, the Paris *meublés'* population is estimated to have increased to up to roughly 12% of all Parisian households with increasingly normal families as tenants (Faure/Lévy-Vroelant 2007:22,165f), while the percentage dropped to less than 2% in the second half of the 20th-century, after condo-conversions and more liberal rent prices set in. Large conversions are reported for 1914-1921 which involved nothing but dividing existing apartments in individual rooms, charging a main-tenant with subletting and registering the place at the police prefecture (Fijalkow 1998:176). In analogy to the US, this evidence seems to suggest that conversions from rent-control, first into private *meublé*-rentals, later into owner-occupied apartments, once legally established, are a factor to be accounted for when explaining the postwar-homeownership rise in France. Up to the 1970s most individual apartment purchasers turned into owner-occupiers, while ever since the close link between individual apartment ownership and owner-occupancy has been loosened. Compared to suburban low-rise areas or the southern European cities, the multi-family building structure is still a good predictor for lower HRs in France, while, compared with single-landlord-dominated cities of tenants in Germany French urban HRs are systematically higher.

Much as in the other two case studies, one could ask to what extent these elaborations about these historical city developments, however plausible they might be in themselves, are still relevant for explaining today's HRs. The ongoing transformation of private rental into owner-occupied apartments questions indeed the close link between urban form plus building types and later forms of tenure, more strongly revealed in the other country cases. To test the long-term influence of the low-rise French city, 19th-century *recensement* building structure data about the number of households per building – a proxy for the building size – have been included in a regression explaining homeownership variation across 2009 French municipalities

in the administrative boundaries of the *communes*, a territorial unit with few changes across the time. Once again, typical explanatory factors such as unemployment, household size and age, agrarian structure, secondary housing percentage and population density have been held constant, yielding the following results:

Table 9: Regression on HRs in 193 French municipalities in 2009

	coefficient	stdt-error	t-value	significance
Constant	1,123	0,101	11,11	0,000
Unemployed of aged 15-64 to total workforce	-0,788	0,085	-9,25	0,000
% agrarian workers	0,65	0,071	9,138	0,000
% industrial workers	0,371	0,205	1,807	0,072
% aged 15-64 to entire population	-0,869	0,105	-8,259	0,000
Persons per household	0,057	0,02	2,916	0,004
% vacation housing	-0,054	0,051	-1,052	0,294
% small companies	-0,49	0,099	-4,97	0,000
Population density	-3,90E-06	0	-2,993	0,003
Population	3,03E-08	0	1,084	0,279
Households per building 1872	**-0,005**	**0,002**	**-1,938**	**0,053**
R^2 (corr.) = 63,8				

Source: recensement, INSEE

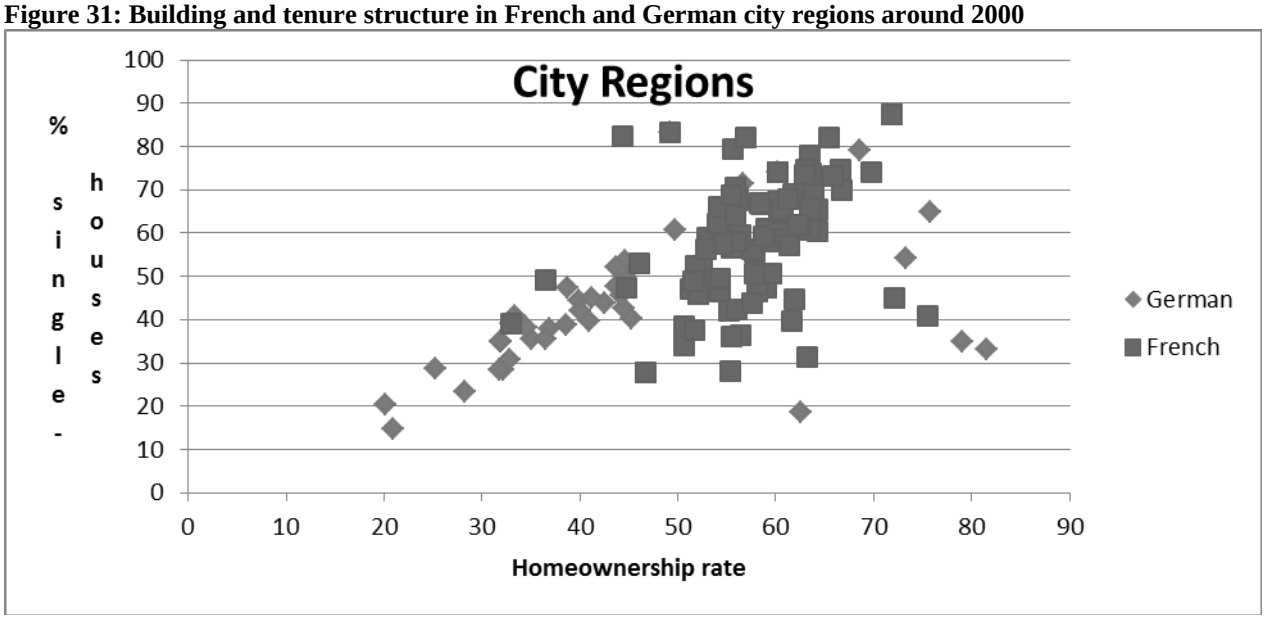
The regression results show a negative significant effect of the number of households per building in 1872 on today's HR in French communes; in other words, the more a French city participated in the low-rise tradition of French cities in the 19th-century, the more likely it was to maintain this type of building structure which has historically made the access to homeownership easier, other factors controlled. Note that the effect is less significant than in the analogous regressions for the German and American case although the French communes underwent less territorial change than their foreign counterparts. This weaker result could be due to co-ownership slowly hollowing out the existing rental stock and the rupture the *Grands ensembles* (see below) eventually meant for some existing communes.

One could have nonetheless expected that the disruptions of two World Wars, leaving especially the northern parts of France with heavy housing damage and destruction, would have caused more discontinuity. After WWI entire regions were devastated and estimates go up to as much as 400.000 destructed housing units (Stébé 1998:57); with additional destructions of air raids in WWII, entire cities such as Le Havre were erased and estimates speak of up to 460.000 buildings destroyed, 1,9 million damaged, though including not only residential buildings

(Voldman 1997:25). Although post-WWI is a time of rising urbanistic thought and new hopes through planned urban development thanks to rationalizations in construction (Magri/Topalov 1988), these new ideas rather find fertile ground on the fields of new construction, but not with regard to the reconstruction of destroyed buildings. After both wars, solidary reconstruction subsidy laws were passed in which funds were tied to buildings being constructed at the same site in identical style. Few cities such as Le Havre could be remodeled according to completely new city plans, while in cities like Caen the traditional parcels were explicitly sought for; established interests of parcel owners normally proved to be too resistant for major new city planning to take place; in 1400 reconstruction plans, however, some land consolidation was included (Roncayolo 1983a:153).

All in all, it also holds for France, therefore, that the once-established housing stock has been difficult to reverse and brings 19th-century urban history into explanations of today's HRs. Sketching large German and French city regions, as compared to the small administrative cities used in Part I, on a scatter-plot of HR by the percentage of single-houses, containing one unit, for averages of 1990-2006 establishes the national differences concerning city shapes even for recent times:

Figure 31: Building and tenure structure in French and German city regions around 2000



Source: Eurostat urban audit, calculated averages 1989-2012

Note that with some exceptions proper French city regions show both higher HRs and higher shares of single-family houses. Even for cities of equal high-rise structure in the graph's center, the earlier apartment-ownership tradition of French cities leaves them with roughly 10 to 15 percentage points above their German counterparts.

This section has argued that these differences in *urban* HRs observable today result from different historic modes of city construction and their resulting building structure. A strong point against welfare-regime-related explanation is the fact that these urban inter-country differences already existed at a point in time, when national welfare states were still much in the making, if existent at all. Contrary to cultural-preference-based explanations of HRs, I put forward that many suburban homeowners were rather pushed into that residential form by lacking alternatives than being particularly attracted by it. The deviant historical building structure of Alsatian cities, moreover, rather speaks in favor urban town-planning institutions as explanatory factor. This is not to deny, however, that strong support for the homeownership option existed in French politics.

Excursus: Homeownership ideal

Such an "idéologie pavillonnaire" has indeed been identified in France and traced from the 19th-century reformers onwards to WWII (Raymond 1966), continued in new conservative housing programs beginning in the late 1960s (Bourdieu/Chrstin 1990:85) and finding its latest expression in president Sarkozy's society of homeowners. Tracing the strong German homeownership ideology helped to show that in the inter-country comparison this explanation had little value as a combination of established physical and institutional urban structures were apparently to strong counterforces. The story about the American homeownership ideal helped to show that it was far from being held by all classes at all times, but took particular circumstances to arise, while major homeownership increases occurred largely independently from it. Tracing the French homeownership ideal in this excursus shall serve an analogous purpose, namely to show that it was nothing innate in French culture but born under specific historical circumstances and that it developed to no minor significance than in the other cases, thus leaving the ultimate variation in resulting HRs unexplained. The most glaring deviation from explanations starting with the homeownership-ideology in the French case are the *Grands ensembles* which emerged in spite of the Third-Republic's legacy of homeownership ideology and surveys reporting strong preferences for owned single-family houses in 1945. All this merits to briefly review the development of the French homeownership idea.

In France, the big and dense city never gained an equally bad reputation as did the tenement city in the US or the *Mietskasernen*-city in Germany (Lees 1985), though figures of thought such as the idea that the socialist dominated, fertility-doomed, disease-ridden Paris would suffocate the authentic France can also be found from early conservative critics like Alban de Villeneuve-Bargemont (Villeneuve-Bargemont 1834:19) onwards to modern decentralizers of the post-WWII era (Gravier 1972). This general lack of what can be explained by the positive

connotation of cities as places of civilization and enlightenment (Schorske 1963) and certainly by the slower pace of urbanization.

This does not imply that the single-family house as housing goal to be achieved for everyone including workers remained absent among French reformers. Much to the contrary, it can be said to have emerged as the victorious of the two alternative housing reform models that had existed among employers by the 1850s (Frey 1987:1), namely the Fourier-inspired *cite ouvrière* tenement block versus the Mulhouse owner-occupied single-family houses.

This latter realization of paternalistic Alsatian Protestant early industrialists took up the small-property idea inherited from the Revolution and became an example for the worker-ownership solution to the social question, supported by figures as different as Napoleon III, the Republican *Musée social* reformers and German or Austrian conservatives such Emile Sax, the author famously opposed by Engel's in his *Housing Question*. Already in 1835 the Mulhouse industrialist and mayor Koechlin helped to construct individual workers' housing with ownership-plan that was appreciated by Villermé's hygiene report ([1849] 1850). Koechlin was the co-founder of the *Société industrielle de Mulhouse* which grouped other local, reformist minded, mostly Protestant industrialists, amongst them Dollfus, who with Émile Muller as his architect constructed from 1853 onwards what became the paradigmatic case of the *maison* or *pavillon individuelle*, to be shown at the World Expositions from 1855 onward: a single home plus garden for a worker family to be acquired through a buying-while-renting scheme offered by a 4%-dividend philanthropic society. "A survey of patronage at the time of the 1867 Exposition in Paris confirmed that the individual house was well established in the provision of housing by employers" (Bullock/Read 1985:420).

What made this paradigmatic case so attractive? First, as Marxist historians are fast to point out, employers were just eager to immobilize a too mobile work-force in regions lacking any urban accommodation. In 19th-century France there was a constant lack of trained work-force and vocational training was mainly organized through learning "sur le tas" in the ateliers. If employers could guarantee that fathers transmitted their knowledge to children working at the same spot, they could count on a next generation of trained workers with no training investment lost to competitors. Companies as Schneider in Le Creusot were even known for building their own professional schools next to the family homes. To reduce all reasoning of employers to that motive, however, would leave unexplained the majority of industrialists' writings, and the reasons why they cared to spread their model beyond their local context. So secondly and even before Le Play, Émile Muller, in "Maisons ouvrières", had made clear that he thought to be engaging in moralizing project: "Property and family-life are the two moralization instruments most powerful in this world […]" (in: Butler/Noisette 1983:52). In the 1820s, at the latest, the

pauperism problem in writings ranging from Lamennais to Frégier, came to the fore, also as a problem of *déraciné* labor nomads, having lost their physical place to be in society, over-mortgaged petty land-owners, vagabonds, etc. not even covered by the meager *bureau de bienfaisance* that required minimum local residence to be eligible for charity (Smith 2003:17). Workers were oftentimes considered to belong to a naturally inferior race that had to be elevated to the bourgeois way of life that had to be given a fixed place again. In this project saving for one's property, paying regular amortizing rents in a disciplined fashion would create such important virtues as *prévoyance* – as the earliest welfare commissions were called – and an attitude against unnecessary consumption, mainly alcohol and clothing. Thirdly, linking the home to the family only, should prevent permanent socializing amongst workers that was considered immoral. In bourgeois lights, this would lead to an undesired spread of socialist ideas, oftentimes discussed in alcohol-serving bars and would otherwise further promiscuous inter-family relations. Villermé therefore strongly recommended to architecturally restrict the number of inter-family interactions in collective buildings ([1849] 1850:8). But the actual number of workers becoming homeowners remained low. Prices make it feasible for elite workers only. Workers feared to lose their independence to migrate, employers themselves feared to waste constructions on non-loyal workers and Paris-employers, for instance, just used the existing housing stock. Thus, the *Mulhouse*-model hardly convinced Parisian employers to adopt similar housing projects (Sowa 1991:62).

When between 1848 and 1852 the housing question entered for the first time the political arena, this was largely due to social Catholic forces associated within the *Société d'économie charitable*. These very early reformers were traditionalists and considered small rural property in the hands of faithful families as the cornerstone of society. The strong homeownership preference can also be found in writings of both conservative thinkers, defenders of the *Ancien régime* such as Joseph de Maistre and und Louis de Bonald or social Catholics such as François Huet (1853), Félicité Robert de Lamennais and Alban de Villeneuve-Bargemont (Villeneuve-Bargemont 1834). Especially in the writings of the latter, the property distribution can be considered as *the* most important means to return to the old order as still cherished in the Restauration regime. Departing from the observation of a correlation between industrialization and the number of miserable paupers that largely surpassed traditional charity efforts, Villeneuve, still as an administrator in various departments in the 1820s, had suggested to re-colonize the countryside with the many surplus beggars (ibid. 19). Agricultural colonies were also an option contemplated by the later Napoleon III when writing about how to extinguish pauperism (Bonaparte [1844] 1848). Small and more equal land property distribution would be the characteristic feature of France as composed to England, for instance, where large land

estates went along with rising pauperism, this critique also being based upon traditional Christian critiques of monopolies and the new concentration of wealth. Already in the middle ages Catholic thinkers had criticized the accumulation of *new* wealth (cf. Groethuysen 1978ff) as being the outer sign of an egoistic attitude, of having gained at the expense of others, of improperly preferring earthly to heavenly goods and of striving to revise the God-made social hierarchies. The argument that exaggerated parceling would create economic disadvantages was usually countered by pointing to the limits that farmers' self-interest would put to parceling. Moreover, the direct affective link to one's property would more than double a farmer's productivity, an argument that might not even have been far-fetched when one considers the exploitation of cheap family labor. Another beneficial effect of small agriculture was seen in its population-control effects. As no farmer would produce more children he could bear to feed, surplus populations could be avoided according to the yet dominant Malthusian consensus of first half of the 19th-century (Villeneuve-Bargemont 1834:414). Too parceled property, however, was to be criticized from Le Play and later natalists onwards as source of demographic problems. The idea of agrarian colonies, however, was almost dead-born by 1860 with the exception of some Catholic educative colonies for children or Algerian colonies (Duroselle 1951:604).

The successor in thought of the *Société d'économie sociale* of the 1890s and the major inspirer for what became not only Third Republic housing but general social reform was the *Musée social*, a solidarist think tank that emerged from the social economy section of 1889's World Exhibition (Elwitt 1980). Materials collected during this Exhibition were to be conserved in order to permanently educate people about social reform – this being the wider sense of *museion* (Horne 2002:85). The Musée and equally Léon Bourgeois' solidarism started from the basic conviction that private charity and employers' welfare alone could not overcome the social problems that contemporaries, after the 1880s depression and the numerous strikes in the 1890s kept being reminded of. Private initiative which remained the cornerstone of society had to be flanked by state support according to the view of central members such as Siegfried, Cheysson, Picot, Boutmy, etc. Starting from this common premise the *Musée* brought together a group of about 500 members of different thought traditions and professions that were well connected to French governing circles: Le Playists met solidarists, social Catholics met Protestants. The *Musée'*s membership was often coextensional with that in the cooperative, mutualist and hygiene movement. Though socialist government participation and the *Musée'*s rich material on the union and socialist movement brought the *Musée* somewhat closer to socialist, the think tank was clearly meant to be an even anti-socialist alternative (ibid. 122ff). Until the mid-1920s there was hardly a social reform that was not commented and examined in

monographic social research by the *Musée*, a good number of important laws was due to its initiatives amongst them the 1894, 1906 and 1908 housing laws, the 1898 law about employers' responsibility for industrial accidents, the 1902 hygiene law and eventually the belated 1919 law on urbanism. Besides these state involving reforms the *Musée social* further promoted all kinds of private institutions ranging from cooperatives, profit-sharing programs and union organization to credit and social insurance institutions. Even if politically independent, resembling more the *Verein für Socialpolitik* than the Fabian Society in this respect and in its more administrative and academic membership (Rueschemeyer/van Rossem 1996), its ideas can be considered the backbone of the most continuous, property-defending, influential party throughout the Third Republic, i.e. the Radical Party.

After WWII, homeownership was briefly a position for all parties, whereas, more permanently in the Fourth Republic, the family movement, the MRP and demographers such as Alfred Sauvy were at the forefront of those defending the family property. With the first disappointments due to the large rental housing estates in the 1960s, single-family houses reappeared as policy alternative promoted strongly by construction minister Chalandon and president Giscard d'Estaing in the 1970s, when he wrote: "Today we have to prefer homeownership to rental housing, individual single-family houses to collective buildings, renovation of old buildings to new construction, the small town to the megalopolis; we definitely have to stop the gigantic constructions" (Giscard d'Estaing [1976] 1978:97).

Historically, the only real alternative housing model to the single-family homes was Fourier's (1849) *phalanstère* that, some unsuccessful experiments aside, found its sole early realization in Godin's so-called *familistère*, inspired, but not directly translated from Fourier. Godin was one of the few workers who succeeded to found his own industrial company and for a lifetime he sought to improve the workers' lot (Godin 1871). Fourier had couched his social reform ideals in a grant philosophy of history. It was based on a law of association, a theory about the adequate mixture of human passions and included eight progressive ages with the *phalanstère* being a community form in the later stages. The latter, contrary to the individual home project, was rather inspired by organicist metaphors. The idea was to not build a sum of individual homes but an entirely new entity, architecturally conform including public amenities ranging from swimming pools to public libraries. Fourier criticizes his contemporary architects for only thinking about how to embellish parts of a larger whole they do not take into account (ibid. 17). Fourier argues in favor of both stricter ex-ante regulation of individual constructions and more rights to intervene into existing property if it is in the general interest. The community should be considered as an enlarged household that would better guarantee economic subsistence and would bring classes closer to one another, also through jointly used amenities. One further

motivation for this holistic household community also stemmed from Fourier's permanent criticism of commercial fraud, usury, speculation that he found in all intermediary market institutions. Selling things for profit would incite to be dishonest. The *phalanstère* was supposed to be both a producer and consumer cooperative that would eliminate the need of market intermediaries. A final motivation stemmed from the idea that the fragmentation of many activities into tiny families would be inefficient compared to the economies of scale of a *phalanstère* and would reduce the demand for housewives, a job not every woman wants and is apt to do, according to Fourier (ibid. 34ff).

Fourier's model was not to be taken up by reformers. The *familistère*, for instance, was not granted Exposition space in 1867. For once, this was certainly due to the unscientific, para-academic writing of Fourier that was loaded with neologisms and whose seriousness was oftentimes doubted. The much heavier objection, however, came from fears about collectivism. The collective living together would destroy the nucleus of traditional society, namely the family, the more so as Fourier was not against polygamy. The alternative of individual housing was associated with rental "barracks" ("casernes") whose military connotation suggested that individuals were thought to be entirely subordinated to the collective, not very desired in French civil society that was never as strongly militarized as the Prussian (Haupt 1989:109). What is more, this kind of housing was to be associated with Berlin housing of authoritarian imperial Germany (Grandclément 1909:133). Even though Fourier was far from claiming that individual property should be entirely abolished (Fourier 1849:26; Kolakowski [1976] 1981:229), his plea for more intervention rights and his favoring collective buildings had brought adversaries and self-claimed heirs to interpret him that way. Fourier's ideas were to be used both as the specter of bad socialism for Radicals and right-wings and as inspirer for the cooperative movement and 20th-century large housing estates.

To summarize, France has not been unique in its homeownership ideology and can therefore be hardly used to explain cross-country differences. Much as in the German and American case, it was no natural universal occurrence but can be traced back to 19th-century conservative reformers in search of social peace who ever since influenced housing policies in this direction.

1.2 Financial-system structure and homeownership

Previous country chapters revealed a clear distinction between Germany where specialized mortgage banks plus non-profit housing associations prior to WWI channeled capital in the urban extensions through higher-rise, income-generating buildings, on the one hand, and the United States where a decentralized deposit-based system of local building societies giving out small loans led to more construction of single-family units. Other Anglo-Saxon and German-

speaking countries seem to follow a similar divide and there seems to be a complementarity between urban and buildings forms and finance. Different types of financial institutions prefer different building types and tenures as collateral. Assigning France to one of the two types is certainly a futile endeavor, as the French financial system – in spite of more similarities with the German than the American one – shows many distinguishing characteristics, historically identified as credit-based and state-led with administered prices (Zysman 1983). For my general claim that the *type of financial institution* made a difference to the building and homeownership structure to still be applicable, it is necessary to find in France's housing finance history the elements that set it apart from the German path while still producing a lag compared to the American low-rise structures and HRs. This explanation shall be given in this section.

Already in the 18th-century and even reaching into the 20th-century, mortgage loans were dominantly made through notaries, a semi-public profession qualified to give credence to all sorts of civil law contracts, including those in real estate, but allowed to go beyond their official public functions. Ever since the *Ancien régime*, notaries could buy and sell their posts and a high initial investment in one's notary-license has been among the reasons for the notaries' expansion into other than mere certification activities (Suleiman 1987). Foremost, they acted as intermediaries, partially also as suppliers, on the mortgage market, establishing personal credit relations between those demanding and those offering mortgages, matching their different principals, rates of interests and durations (Hoffman/Postel-Vinay/Rosenthal 2011). Cooperation with other notaries concerning market information, about credit-worthiness in particular, and their institutionally trusted role allowed for relatively stable mortgage market of local and even interregional extent. Great Britain and German states are also known to have relied on functionally equivalent networks of attorneys or notaries, even though stronger urbanization and the spread of banks – with stronger cooperative banks in Germany – led to earlier replacements through institutional mortgages than in rural France (Clemens/Reupke 2008). Next to the notary network whose mortgages in 1840 amounted to an estimated 27% of French GDP almost non-researched family, merchant and other personal credit relations remained an important mortgage provision (Hoffman/Postel-Vinay/Rosenthal 2011:159). Notary credit as opposed to credit pools relied on only a single person's ability to repay the loan, mostly in a lump sum, and remained moreover regionally undiversified. As it relied neither on larger capital markets nor accumulated deposits its individual mortgage sizes remained limited in size. While small-scale construction of new tenement buildings of several stories must have been possible, large-scale construction of entire streets or city extensions went beyond the risk and finance potential of these traditional networks. In that sense, notary-

mediated long-term mortgages were part of the conserving forces of the low-rise city, allowing for story-adding, building extensions or replacements – not to speak of all the real-estate-unrelated purposes – but not for accommodating larger housing demands.

The Revolution brought about two changes: first, the inflation of paper money had undermined lenders' confidence in any longer-term credit and reduced loan durations to less than five years (Hoffman/Postel-Vinay/Rosenthal 2008:145). Only at mid-century, had notary-loans reached pre-Revolution levels in the provinces, though never in Paris due to the second change: the introduction of a land register in which property encumbrances could be voluntarily written and inquired against cost. The fact that the register was neither exhaustive nor constitutive for legally establishing property was to hamper individual mortgage development in France into the 20th-century (Allinne 1984:21). The costs involved in using the land register restricted it mainly to larger properties and therefore turned into an information source for big rural property holders and the mortgage lenders in larger cities. Especially in Paris, therefore, the register began to dissolve the information monopoly once held by notaries about lender credence and property encumbrances, while its information opened the market of large mortgages to possible other lenders, such as mortgage banks (Hoffman/Postel-Vinay/Rosenthal 2008).

Ever since the unfortunate experience with John Law had there been attempts in France to create currency or bonds backed by real estate property as collateral. Carried by Saint-Simonian ideas, the 1820s had witnessed the rise and fall of two early mortgage banks in Paris, responsible for the first larger-scale city-renovations ever since the royal city-extensions. But only as late as the 1850s, did a combination of Saint-Simonian ideas, a dearth of larger and especially agricultural credit and dynamic bankers such as the Péreire-brothers to the establishment of the soon-to-be largest mortgage actor, first in Paris, then throughout France. This *Crédit foncier de France* (CFF) has already been mentioned as the example for the private Prussian stock mortgage banks, while the CFF itself was adapted from the rural Prussian *Landschaften*, a model which refugee Polish noblemen, politicians and Saint-Simon inspired intellectuals in Paris made known (Liebich 1979:129ff). Saint-Simon was credited the idea to use publicly organized credit for the promotion of the most productive and able forces in a society (Schmidt am Busch 2007:59). Designed as a private stock bank of about 40.000 stockholders in later time, the CFF was supposed to give out mortgages to usury-free-credit seeking farmers, meant as imperial gesture to regime-supporting peasants, to be refinanced by the sale of mortgage bonds on the Paris capital market (Allinne 1984), with bonds easily tradable on the Paris stock exchange. The government, however, maintained close links to the de-facto para-public institution, regulated its interest rates at first and assigned its successive

presidents. Even though smaller in volume than the German mortgage banks as a whole, the CFF nonetheless became the largest European mortgage institution and, contrary to the founders' rural concerns, soon directed its profit-seeking capital towards foreign markets and especially the Haussmannization of French cities, where it financed private and public real estate developers including own subsidiaries, housing constructions and purchases.

In less than two decades the CFF conquered 18% of the French mortgage market, entirely dominating the Parisian one, where it practically replaced the notaries, and extending into provincial cities. It was almost exclusively dedicated to rental mortgage finance because it relied on the land register as credit-information source where only larger properties were included. Other factors known from the other country-cases added to the close link of mortgage banking and tenement construction: the CFF began its practice without any branches that could have collected local market expertise of its own and, for administrative costs already, preferred to give out loans to larger recipients whose reputation was established in the financial world. Moreover, the regular rental-income payments also corresponded well to the annuities that were paid to the bond-holders. Besides its para-public façade, the CFF had a clear commitment to profit-making and, given the preconditions of Haussmann's urbanism, central city bourgeois renting was a profitable business. When demand appeared to be slowly saturated in the 1860s, the CFF moved on to the Parisian periphery and then to the provincial central cities. Once demographic and overproduction reasons led to the building crisis of the 1870 and 1880s, however, the CFF withdrew almost completely into other more profitable domains, including domestic or foreign infrastructure finance; considerable parts of French investments in the fin-de-siècle went abroad. Between 1883 and 1950, the CFF, much as other banking capital that had temporarily entered the market and was often absorbed by the CFF, abandoned the real estate market for lack of sufficient profits, while adding to the low private housing production volume and the continuation of the low-rise city throughout this time. In contrast to the more than dozen German stock mortgage banks, the CFF could more easily move in other domains of finance and was under less economic pressure to continue even lower-cost urban constructions. Contrary to American housing finance, France thus also developed a mortgage banking institution in the 19th-century that provided the necessary large sums for the erection of tenement cities.

Again uncertainty reigns concerning the causal direction of the claim: for the purpose of re-constructing large parts of the already settled Paris with its high property values nothing less than a centrally organized capital-collection institution was necessary to manage these finance requirements. In this sense, therefore, the causal arrow going from the existing building stock to the kind of financing it made necessary is hard to deny. But at the same time, the finance

institutions, once set up, developed a certain dynamic of their own, entrenching the type of building types that initially might have brought them to life: not surprisingly, all CFF-financed buildings in the Second Empire went to the outmost building height the codes allowed for and, the heyday of inner-city flat-construction gone, the former suburbs were covered with higher-rise buildings (Topalov 1987). After these financial structures had led to an overproduction of dwellings, capital-market financed speculative building companies only reappeared in the late 1950s on the height of a new construction boom in rental housing (Topalov 1974).

While with its CFF, France certainly participates in the group of mortgage-bond based countries showing a considerable historic stock of rental buildings, the long-time withdrawal of the CFF from the less profitable rental mortgage market left it halfway when compared to Germany. Whereas France thus developed a central specialized mortgage bank (Lescure 2003), it did not develop the building-society type of housing finance as special mortgage circuit but largely maintained the traditional notary-mortgage circuits outside of Paris with non-specialized local universal banks developing in parallel. One of the reasons for the absence of specialized local mortgage institutions, comparable to the German case, was the network of urban savings banks, popular banks *Monts-de-piétés* and, of later date, rural banking cooperatives which already covered the function of local deposit-collectors, while they gave out small-amount consumption or welfare credits only. Many of the institutions rather served the needy as a pure savings institutions, while especially the savings banks were rather interested in safe and uncomplicated investments in government bonds through their central institution, the *Caisse des dépôts et consignations* (CDC). The latter also managed the funds of the state-initiated 1881 postal savings banks which largely served the purpose of government financing. Prior to WWI, more than a third of the population in Germany and France – compared to one tenth in the US – were savers in these saving institutions (Garon 2012:93) and France was internationally known for its high savings rate.

At the same time, however, these savings banks deposits were not earmarked for mortgages of a specific kind, let alone for mortgage *tout court*, as almost all funds were invested in government bonds until WWI which was both due to government compulsion but also lacking dynamism of most local directors who preferred a secure investment to adventurous (social housing) mortgages. The savings banks director and LePlay-inspired reformer Eugène Rostand who supported the local HBM associations in Marseille is a notable exception (Gide 1924:13), but generally, as during the 1890 savings banks congress, their directors voted against a locally independent use of their funds, let alone for public housing purposes (Americi 1997:87).

Housing associations instead of building societies

The other type of institution competing with building societies in the housing domain and retarding their rise in France were non-profit housing associations which had both a limited-dividend tradition of *sociétés anonymes* starting with the endeavors of philanthropists up to the Emperor in the first half of the 19th-century and the rather worker-based cooperative movement of the later 19th-century, a twofold tradition still being reflected in today's HLM-organization. The former were almost exclusively dedicated to urban rental housing construction for lower-income classes – often involving model housing and paternalistic experiments – whereas the latter – contrary to the German tradition divided over this issue – produced almost exclusively family houses for their members only and dissolving afterwards, almost like terminating building societies. The precise impact of this institutional difference is difficult to indicate.

In general, these housing associations did not flourish very much prior to the 1880s housing movement bringing about the necessary laws from 1894 onwards that granted them technical and financial support in form of cheaper mortgages. Local savings banks were granted the investment of up to 20% of the assets in these mortgages but the sums attributed were nothing near this legal limit. Eventually, most state loans were given to the associations via the CDC and the CFF as well as the 1910 pension fund, but the overall financial and construction achievement prior to WWI is estimated to be not higher than 15.000 units and not higher than 350.000 by WWII which contrasts strongly with the estimated 150.000 and over a million units for the respective German production. The Bonnevay law of 1912 permitted municipalities and departments to set up their own housing associations which became practically relevant only after WWI. The following table offers an overview of the housing association foundations from the 1894 law until WWII:

Table 10: Numbers of founded housing associations

	1894 to 1918	1919 to 1927	1928 to 1933	1934 to1942	Total
Soc. de crédit immobilier (SCI)	53	60	53	5	171
Sociétés coopératives (SC)	13	60	29	7	109
Sociétés anonymes (SA)	3	31	66	16	116
Offices publics (OP)	2	87	81	4	174
Total	71	238	229	32	570

Source: (Croizé 2009b:67)

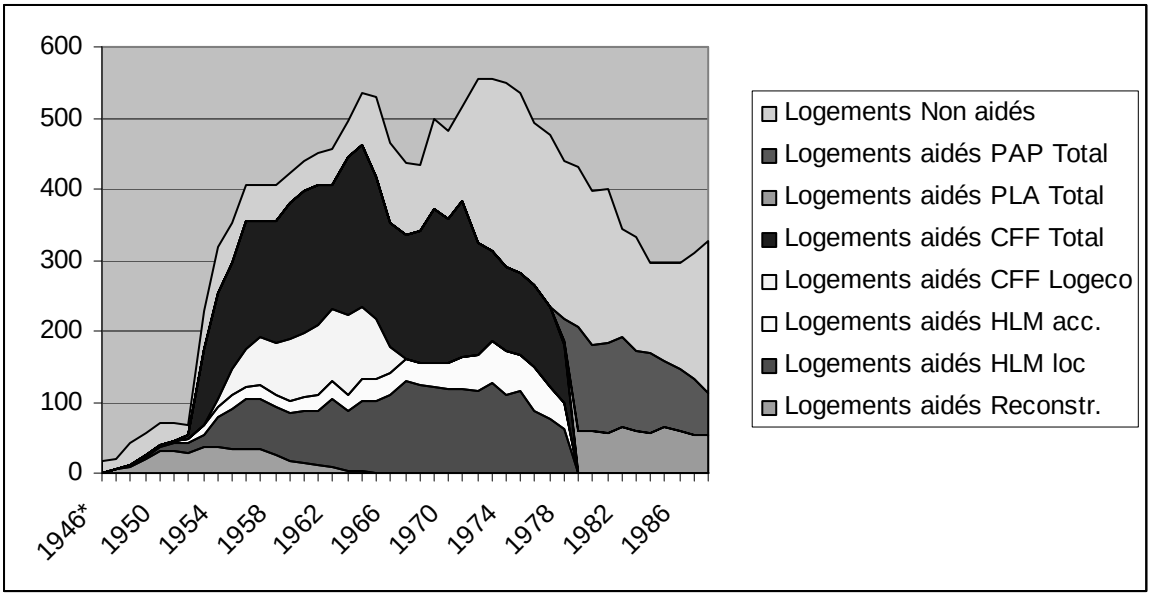
Particular attention should be given to the first line which refers to a comparatively unique French structure set up through 1908 Ribot law, inspired by the Belgian example. These *Sociétés de crédit immobilier* (SCI) were acknowledged and subsidized mortgage banks, which addressed lower-income strata with the intention to bring them into homeownership. They can thus be considered as a kind of state-subsidized homeownership-finance institution, functionally equivalent to the SLAs. During the interwar years, they had grown to more than 300 in number, with the large *Société centrale de crédit immobilier* (SCCI) financing more than 10.000 housing units by WWI; supported by tax exemptions, the 1908 housing law granted them access to funding by the *Caisse nationale des retraites et de la veillesse* and by the CDC in 1926, lending to about 140.000 households from 1908 to 1939 (Frouard 2012:118ff). The clients of these banks, lending at 2% with as low as 10% downpayment largely corresponded to the legislator's expectations and consisted mainly of workers and small employees (Dupont 1994:28), willing to settle in suburban regions (Faure 1998) and were lauded as vehicle to democratize mortgage credit (Monceau 1930). Compared to the Belgian counterpart-law from 1889 which had led to the construction of 55.000 houses prior to WWI alone, the SCIs certainly scored less well but deviated from the German subsidy scheme by having a network of financial institutions with the purpose to bring lower-strata into homeownership (Lescure 1980:475).

By WWI, French housing reformers had at least set up what was to become the structure of a special housing provision circuit, with specialized financial and housing associations of which the SCI and cooperatives[45] focused upon owner-occupancy provision, whereas municipal bureaus and SAs were primarily concerned with rental housing construction. As compared to the mortgage-bank circuit but probably also compared to the corresponding German circuit, this initial phase of French public housing had a much clearer homeownership bias, even though financial imperatives, particularly in the late 1920s construction, might have bent construction to the other end, certainly against the explicit intents of reformers and their laws. This set of institutions, originating out of 19th-century reformer circles, also preempted the course of later state housing policy in France which, contrary to the US policy in favor of private housing *finance* institutions, was much focused on subsidizing housing *construction* associations. So even in the case of France, where the 1950s' housing construction appears, already visually, as much of a rupture, it was executed within an institutional straitjacket that Third Republic's reformers and their associations had left behind.

[45] The rental cooperative where owning members rent to themselves via a professional management, more widespread in Germany, is rare in France (Attar/Lourier/Vercollier 1998:34).

The early homeownership bias in favor of lower-income households remained a distinct feature in the French housing finance structure. Instead of local associations collecting deposits and making them available as mortgages to local households like in the case of American building societies, French deposit banks centralized their savings at the CDC or tapped the capital market through the CFF to redistribute mortgages centrally. These low-interest-rate mortgages in turn also reached local housing cooperatives and credit societies meant to further homeownership. When after WWII almost no mortgages were given out outside one or the other state program, these circuits of the CDC but also the bonus-and-credit program of the CFF – installed in 1937 and extended in 1950 – guaranteed financial means to individual homebuyers next to the otherwise dominant funds for the construction of rental housing estates (Effosse 2003). From the 1960s onwards, the mortgage-market share of private banks began to increase and state credit programs were subsequently distributed via commercial and saving bank counters, beginning with the personalized credits of the 1970s and continued until today's zero-percent credit from the 1990s onwards.

Figure 32: Housing starts according by financial source in thousands



Source: (Jacquier 1992:208)

Whereas this circuit therefore meant another condition preventing building-society-like structures from rising in France, the tradition of French workers to organize in mutual aid societies, contributing regular payments to insure against typical risks of life, might have further alienated possible funds to non-housing-saving purposes. The origin of these mutual-aid societies reaches back to *compagnonnages* insurances (Radelet 1991:34). While their political associations were widely repressed before the Third Republic, their insurance systems were even actively supported under the Second Empire, leaving a system of about 18.000 societies

with 3,5 million workers insured, mostly in form of burial funds (Kaelble 1991:122). This mutualist movement constituted the less radical part of the labor movement and, apolitically, remained largely at a distance from it; it was to serve as the foundation for later social security developments. These, in turn, were used to give out mortgages to the HBM-institutions, though, judged by their outcomes, in lower volumes than across the Rhine. To the extent that savings went into regular insurance contributions, they were directed away from housing savings and, in that sense, one can also discover the 19th-century trade-off between welfare institutions and homeownership in the French case.

In Germany, the 1920s witnessed a growth of their building-society equivalent due to post-inflation lack of capital, a spill-over of the cooperative idea and land reform ideas, three enabling factors less developed in France, where no hyperinflation had taken place. Moreover, the cooperative movement was rather focused on producer, then especially consumption cooperatives, while credit and housing cooperatives only grew from the 1890s onwards (Gide 1924). Finally, land reform ideas were hardly promoted in France; even though Georgian single-tax ideas and land-municipalization proposals were known through the Belgian land reformer Emil de Laveleye, the small rural property tradition and urban radicalism were cited as hampering factors (Gutzeit 1907:51). Eventually, building societies of the "continental model" originating in Germany, i.e. specialized housing credit cooperatives *without external savers*, did emerge in the Alsatian region in the 1930s, when, in the absence of proper regulation, they soon ran into the same risks that had haunted German *Bausparkassen* earlier: to keep mortgage promises they went into a deadly competition for new members whose new savings contributions were to make mortgages available on time until lacking new members led to the first queues, savings withdrawals, even longer queues and eventual bankruptcy (Effosse 2003:166ff). The belated French administrative response to the so-called *crédit différé* then introduced a highly regulated scheme, followed by several others, relating ex-ante savings to the right to receive a low-interest loan (Klocke 1980), though still in 1965 saving deposits contributed only 4% to housing finance in France as compared to 35% in Germany (Bouveret 1977:37); prior to the mobilization of private savings and the establishment of a mortgage market, the central state contributed a lion's share of over 90% to housing finance. With specialized saving accounts for housing offered by banking institutions and subsidized by the state, the French state established a similar housing-savings-model as in Germany, though not necessarily tied to specialized independent institutions – commercial banks held over 75% of the housing-saving accounts in the 1980s (Thiolon 1986:207) –, less widespread among French savers and without the elements of cooperative saver-loan-taker identity (Bouveret 1977:445).

In sum, the French housing finance system shows, on the one hand, some remarkable similarities to the German one which explains why historically France was not a high-homeownership country. Mortgage banking favored the construction of mainly rental high-rise cities in the 19th-century and a widely developed system of savings collections retarded the rise of specialized local housing finance institutions favoring homeownership of the building-society kind. Their belated rise in form of state-imposed housing-savings accounts promoted ex-ante savings and thus promoted a later entry into homeownership with higher equity, even though on a less widespread basis than in Germany. The implication of local and private retail banks in the mortgage business had to wait for the 1960s[46], while traditional credit networks were longer in place. The centralized housing finance institutions were instrumentalized, on the other hand, to give out subsidized mortgage loans to lower-income households via cooperatives or the credit societies which otherwise would not have had access to the necessary funding. In the public housing finance circuit, therefore, France showed a homeownership bias from very early on which lacks an equivalent in the German case. One reason for this bias could be located in the different attitude towards homeownership expressed by socialists.

Excursus: French socialists and homeownership

In contrast to Germany where social democrats and unions began to embrace the housing cooperatives to support non-profit housing construction for workers, with some of the largest housing companies being in union hands following the model of the Weimar settlements, a development of similar dimensions did not take place in France. At the same time, laws supporting homeowners from the pre-WWI to the 1920s lotissement and Loucheur laws were passed with socialist support. While clearly adhering to social housing construction and the HBM-organization, French socialists were not strongly identified as the party for tenants and not equally resistant to homeownership as their German counterparts. All major housing laws, including the one introducing municipal HBM, had been introduced by conservatives or liberals, but were usually passed with the full vote of the socialists, i.e. passed unanimously prior to the communists' appearance (Raymond 1966:202; Sowa 1991:23). Differences in ideology, economic development, labor organization, the party system and electoral strategies

[46] A similar late-start can be found in the case of *consumption* credit which also grew to much higher levels in countries such as the US, whereas in France the government's reservation concerning indebtedness in general and stricter regulation, supported by actors as different as unions and the Catholic church, prevented a democratization of these credit instruments (Trumbull 2010b; Trumbull 2010a). There was a general growth of household indebtedness from 21,75 billion francs in 1966 to 100,2 in 1976 (Lazarus 2010:32). Still in 2005, while the UK had almost two indebted homeowners for every mortgage-free homeowner, France showed an inverse relation of 1,5 mortgage-free homeowners for every debt-encumbered one (Bugeja 2011:39).

can explain this different party position, which is partially reminiscent of the American case where the homeownership-question has also not given rise to a party-cleavage line.

Traditionally, the French labor movement was much less united, less powerful and more radical than the German one, unions and socialists were furthermore often divided among themselves (Kaelble 1991:83ff). Resources for the foundation of housing companies therefore lacked as much as interest in housing matters. A content analysis of "La vie ouvrière" between 1909 and 1914, for instance, shows only four housing articles amongst 1196 (Groux/Lévy 1993:28); looking for housing-related articles in the *Le Peuple* index during the 20th-century gives no different impression. Unions' primary focus, not surprisingly, lay on the level and increases of wages, working conditions, safety and hygiene. From early on, however, the CGT was not just a narrow interest groups, but also defended a Marxist inspired vision of society as a whole. Therefore, positions such as the final expropriation of all private housing property became an issue. Unions just reacted to day-to-day problems with housing offered by employers that were accused to neo-feudally restrict workers' newly gained freedom. At most, unions joined popular uprising against inflationary prices including rents.

Ideologically, one of the theory-reference points in French socialism was Proudhon who became known in wider societal circles thanks to his pamphlet "Qu'est-ce que la propriété?" in which he famously equated private property with theft (Proudhon [1841] 1873). A closer reading, however reveals, that Proudhon does not generally oppose private property; he rather agitates against the unequal distribution within a private property regime and against all property not gained through labor, a position that became one focus of Marx' critique against Proudhon (Marx [1844] 2009:95; Kolakowski [1976] 1981:235). From Proudhon's point of view then seeking rents from housing property is as illegitimate as seeking rents from capital and exploiting the surplus value of labor (Proudhon 1848:4). Much as the capitalist exploits the proletarian, so the landlords exploit the tenants, just on the consumption side of the coin. Municipalization of rental housing or tenancy law would not have solved the problem at its roots but just maintained an intrinsically exploitative relationship in different form. Proudhon rather suggested the accumulation of the small savings coming from labor and he himself founded a not too successful credit cooperative to further this end. Even though another socialist wing represented by Lafargue and Guesde defended more orthodox Marxist points of view including housing, the Proudhon small-property position remained no minor position among French socialists.[47]

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[47] By contrast, Engel's "Housing Question" had not been translated and known in France until 1936 and was not published in major volume prior to 1957 (Jolis 2009:9).

This position also corresponded well with the small property tradition and slower economic development in France. On the one hand, many workers still remained connected to their traditional land, possessed a piece of family land to which they recurrently returned (Kaelble 1991:29f). Moreover, much industrial settlement took place in rural regions where workers could aspire to homeownership more easily. On the other hand, with the slower degree of industrialization, small peasants proved to be crucial for determining the overall vote so that the defense of small rural property was of electoral importance to socialists who adapted their program to these circumstances (Jonas 1985). From the 1894-socialist congress in Nantes to Waldeck-Rochet, communist expert in agrarian questions, French left-wing positions considered therefore the small rural property as bulwark against pauperism (Puhle 1975:219). Engels came to criticize this position because it would make these small owners believe that parcel ownership could survive in the high tides of capitalism (Engels [1894] 1972). It would further perpetuate a system in which they were usually exploited by usuries or state's property taxes. Engels recommended direct voluntary cooperatives instead.

Finally, from WWI onwards, the French socialists were faced with a persistent opposition from the left through the Communist Party which declared itself as defendant of exploited tenants and strived for a nationalization of the entire housing sector whose new constructions should take the exclusive form of more social rental housing (Manow 2008:104ff). Caught in between this radical and the conservative positions, socialist party programs usually express both a concern for social housing as well as for individual workers and peasants desiring property ownership.

Overall, pro-homeownership was no stock position for French socialists as it was for American Democrats, but it was more actively defended and not outright opposed as in the case of German social-democrats and the union organizations. At the same time, the link between socialists and the often municipal social housing providers also became one of the mechanisms in favor of continued subsidies to the social housing circuit.

1.3. *Grands ensembles* interlude vs. the creation of individual mass housing

In the US-German comparison two ideal types of industrial organization in construction have been distinguished for the single-family housing sector: on the one hand, the Fordist one being based on easily workable material such as wood and being on-site or factory-produced according to mass-production principles in the American case and, on the other hand, an artisanal durable-quality production in Germany, producing homes rather as expensive status goods. Again, France resembles in most respects the latter production type, but developed a larger segment of mass-produced houses from the 1970s onwards.

Whereas the US embarked on the light technical style of wooden construction for suburban family houses in the 19th-century, France, by the 1830s, had established the traditional house made of stone as the building standard, characterized by its durability, weight and preponderance of construction over maintenance cost (Chaunu 1971:23). Spreading from the Mediterranean region, it gradually became the typical building type, even if other traditional materials such as lime or plaster still persist and new ones such as brick and especially concrete emerged (Désert 1971:57f). Even though armed concrete slabs became the notorious construction material for much later rental housing, the single-family housing production remained relatively conservative and a survey of the housing stock according to different materials still reveals a dominance of solid materials, even if hollowed bricks and concrete slightly reduced the dominance of stone in more recent constructions (Le Grand et al. 1987:88).

The French construction sector maintained a largely artisanal orientation, also due to fewer urbanization pressures. Individual firms were smaller than their industrial counterparts, but larger than those of other artisanal trades (Cahen 1954). In a ranking of productivity developments in 21 sectors between 1896 and 1962, the construction sector lags behind all but the mining industries (Croizé 2009c:119). Although monarchs and ultimately the Loi Allard of 1791 had dismantled the self-regulation powers of the artisanal building trades (Bokelmann 1993:50), they unofficially maintained certain institutions such as the apprenticeship system and the journeymen-master distinction, also thanks to less repression in the 19th-century (Lenger 1991:12). Whereas German artisans were gradually returned their self-governing rights and certain economic privileges, French artisans received at least a special legal status tied to tax exemptions and particular credit access in the interwar-years, whereas the re-integrated Alsatian artisans maintained the German system (Bokelmann 1993). One main difference concerns the size: whereas the French *artisanat* is restricted to firms with not more than ten employees, German *Handwerk* firms are allowed to grow to even middle-sized companies, which are less frequent in the French building sector (Lafont/Leborgne 1974b).

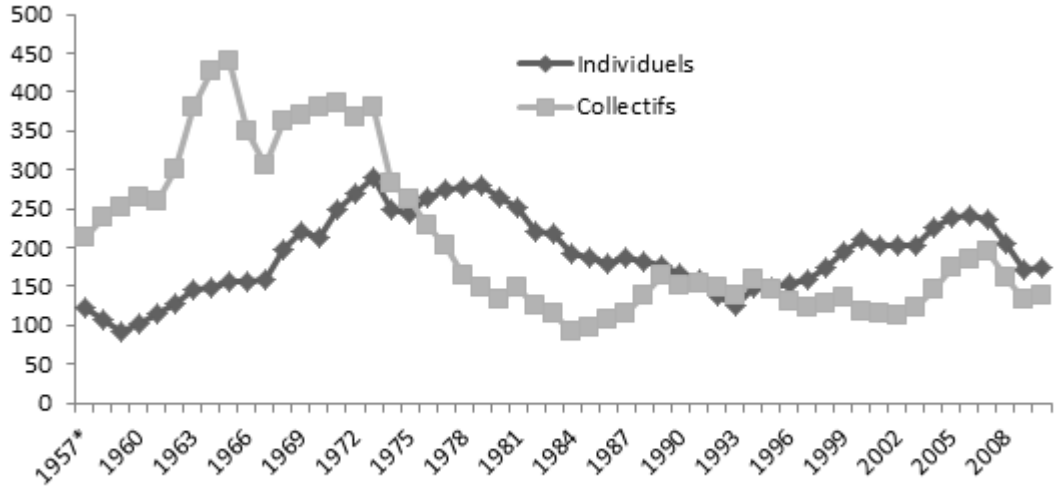
With the strong state involvement in housing after WWII, the sector witnessed the emergence of large construction companies, while the concessionary policies towards the *artisanat* came to an end (Zdatny 1990:416); artisanal housing production was considered an undesired remnant of an inefficient past. Overall, the French construction sector has developed a comparatively high degree of concentration. The strong primacy of the urban system, the high percentage of orders coming from the central state but also the high order volumes traditionally associated with colonies and post-colonial countries had a play in this. The construction of housing estates was also undertaken with a high degree of concentration, not only among housing but also housing construction companies. “Of 101 new construction sites by January 1st

1964, almost two third contained between 500 and 999 housing units. Only 37 construction sites had more than 1000 units; 11 reached the 15.000 units. This implies an average of 942 units per construction site (Tellier 2007:61). Whereas in 1896 there was only one company having more than 200 employees, there were 10 companies having between 20.000 and 40.000 employees in 1980 (Croizé 2009c:132).

The primary playing field of these large construction companies in housing was the production of large housing estates. Works about postwar French housing are abundant and their focus is very much determined by what came to be known the *Grands ensembles*. Not only historians have begun to study these unique state-led Le-Corbusier-inspired concentrations of several thousand new housing blocks on green suburban fields; also the mass media, international visitors and French sociology became a constant observer of this real-life experiment in community construction, not without feedbacks on the identity of the sociologic profession. The French construction history in the heyday of the *Grands ensembles* even came to resemble more the housing developments in the GDR than the FDR because the former, which equally prioritized industrial prior to housing recovery, began industrialized housing construction in 1965, and used concentrated building conglomerates at the expense of smaller artisans and prescribed state-normed building types (Rowell 2006:40). In the 1960s, the overall share of occupied single-unit buildings in France and West-Germany had even reached an about equal level (Durif/Berniard 1969:3). In light of the crushing dominance of rental housing units constructed particularly during the 1960s, one must wonder how a similar rise in homeownership was even possible, given that new construction of "collective" form was usually for the rental sector, even though the *Grands ensembles* and the social housing stock always included certain HBM-categories destined for homeownership.[48] The answer is: Whereas the GDR consistently continued to build large shares of industrialized high-rise housing units, ending up with a HR of less than 25% by 1990, France simultaneously developed a circuit for the mass-provision of individual housing units through the private market, once the famous 1972 *circulaire* had officially ended the *Grands-ensemble* period.

[48] In 1928 and 1930, the *habitations à bon marché* (HBM) were already complemented by an upper-class rental type, the *Immeuble à Loyer Moyen* (ILM), later joined by the *Immeuble à Loyer Normal* (ILN), whereas the HBM were renamed *habitations à loyer modéré* in 1950, mainly to avoid the connotation of cheap housing in times where broad strata of the French society were eligible for these units. HLM remains a misnomer as certain subgroups, the *HLM-accession* are homeownership programs where households do not pay reduced rents.

Figure 33: Housing starts (before 1973: authorized construction) in thousands



Ministère de l'Équipement, until 1988 see (Jacquier 1992:209); otherwise INSEE

What explains this particular rupture with the tradition of the *ville basse* which, considering the *longue durée*, rather appears as an exception to the rule than a final turning point? Immediately following WWII, the discourse still embraced at least both low-rise and high-rise housing solutions, but as late as the 1950s, the construction of large housing estates with mostly rental units had become the general consensus which was not seriously questioned by any of the political parties, which all hoped for housing solutions through more rationalization. A first explanation for this consensus lies in the interwar experience of sprawling suburban developments that had played into the hands of communist municipalities, partially responsible for the party's considerable electoral results in the Fourth Republic (Stovall 1989). This experience had removed unplanned settlements through single-family houses from the realms of possible options (Magri 2008). The only proposed alternative, eventually to be taken up in the later 1960s, consisted therefore of orderly single-family house settlements in grouped arrangements. Secondly, during the Resistance and until the 1950s, there was a general consensus among French elites that the country would have to be modernized if it was to survive in international competition. Revealingly, the first economic Plan Monet of 1947 did not attribute special funding to the housing sector but focused on credit to basic industrial sectors. Only the second plan, as late as 1952, took housing into consideration, whereas the industrial construction of large estates, with Scandinavian and Soviet examples, meant to become the epitome of *modern* housing, that could be centrally financed through the CDC (Landauer 2010:14). This was, thirdly, related to the then dominant modernist architectural current, associated with the International Congress of Modern Architecture, the Athens Charta of 1943 and Le Corbusier, who was well connected to the French political elite, the

construction secretary Claudius-Petit, amongst others, for whose municipality the Swiss architect had designed a housing estate (Tellier 2007:31). Fourthly, with the war-time housing destruction, almost four decades of insufficient new construction and the expected marriage boom, the overall estimated housing shortage went into the millions (Bosvieux 1998); moreover, the French housing stock was among the oldest and worst equipped, as compared to similarly developed nations. Due to industry's priority, new construction numbers did not really take off prior to the mid-1950s, but the sense of urgency pervaded the political debates and quantitative goals superseded many discussions about different housing tenure.

Finally, the enormous housing construction effort of the discontinuous *Grands-ensemble* type was technically only an extension of the tradition of engineer-led infrastructure constructions that had started two centuries earlier. Beginning with the route infrastructure in the 18th-century, ordered by the king himself and exercised by the then newly founded engineer *Corps des Ponts et Chaussées*, France had established the idea and provision of collective goods through the central state. In the 19th-century this extended to the provision of the canal system in the 1820s and the planning of railroads from the 1840s onwards (Smith 1990:101ff; Dobbin 1994). The main motivation for the state to establish plans and to make their following mandatory for licensed private firms was to avoid irrational planning created through uncoordinated competition of too many private market actors. The United States or Great Britain then usually served as negative example. State planning of the infrastructure could provide for more rational and efficient solutions for the public good, especially in the long run, and the well-trained, nationally spirited, universally skilled engineer Corps – in 1794 the merit-based *École polytechnique* had been founded (Belhoste/Chatzis 2007) – were the perfect instrument to devise and control these technocratic plans (Thoenig 1973). However, until urban planning in the 1950s state engineers were not called for to provide the superstructure also as a public good (Picon 2007:202), until the experience of failed individual coordination during the interwar period motivated their central planning approach. Experience with town-planning and construction of large estates had already been made during colonialization where planning authority had been easier to establish than in the Third Republic (Wright 1991:55). Engineers employed by the CDC-founded *Société centrale immobilière de la caisse des dépôts et consignations* (SCIC) that constructed many *Grands ensembles* beginning with *Sarcelles* often came from the *Ponts et Chaussées* school and brought colonial planning experience with them (Landauer 2008:74f).

At the same time, the probably first representative survey published by INED in 1947 had revealed that 72% Frenchmen desired to live in single-family houses, while two thirds preferred ownership as form of tenure (Girard 1947). Other surveys of this kind revealed similar results

and were also taken up by the 1963 Rueff-report, suggesting an American kind of suburban building as alternative to the *Grands ensembles* (Mulvey 2011:207). Surveys moreover revealed that most inhabitants expressed the desire to move out into individually owned houses (Touraine/Cleuziou/Françoise 1966). In fact, this corresponded with what some planners had actually conceived the large estates for: as 30-year lasting post-war housing solution to let inhabitants choose afterwards (Tellier 2007:59). Thus, at a time when the French preference for homeownership was reportedly as high as usually results from these surveys, the actual new production results and housing stock composition had turned into an entirely different direction. In light of the tremendous impact of the *Grands ensembles*, one may wonder how the French HR could even keep rising and stay above the German one. One explanation lies in the state-led single-family house programs both in demonstration projects such as the international group of prefabricated individual houses in Noisy-le-Sec (Bullock 2007) and the typification for mass-production. This latter developed as so-called *Logéco* (*Logement économique normalisé*) program of the 1953 *Plan Courant* through which CFF-subsidies allowed for the purchase of highly standardized types of ownership-housing units of which around one million were to be produced until 1963 (Flamand 1989:201). Revenue norms limited the eligibility to certain income groups only (Effosse 2007:23).

From the 1962 *Circulaire relative à la maison familiale et à l'urbanisme*, the construction secretary Pierre Sudreau set out to develop housing estates involving a mixture of individual and high-rise dwellings and the public developer SCIC constructed ready-for-sale individual units (Croizé 2009a). The new urban planning instrument ZAC (*Zone d'aménagement concerté*)[49] should also improve its predecessor ZUP (*Zone à urbaniser en priorité*) by including between 30% and 50% individual units in the larger estate developments. In the 1960s, the famous American Levittown-builder had built up a branch in France in his international expansion strategy and was among the first to construct entire fields of family homes in the Paris region; until the oil shock, he built over 5000 family homes, some situated in neighborhoods of over 1000 units (Gournay 2002). Kauffman and Broad began selling in the suburbanizing Aix-Marseille region in the 1970s (Pinson/Thomann 2001:40). Still prior to 1966, "only one construction permit throughout France was about a group of more than 500 individual houses and only 36 for groups of more than 100 units" (Steinmetz 2012:30). In that same year, however, the government sponsored building competitions called "villages-expos", signaling its interest in single-family house constructions (Mulvey 2011:208). Whereas the

[49] In response to weak local planning powers, the French state itself had seized the power to purchase or expropriate and develop land for estate planning purposes, also by declaring certain zones as development zones (Cohier 1990).

specter of uncontrolled suburban development still haunted the administration, the idea of so-called grouped settlements of individual houses, equally promoted by the biggest mass-producer of single-houses Maisons Phénix and the newly founded *Syndicat des constructeurs de maisons individuelles*, gained ground in the 1960s and became the theme for the 1969 *Concours international de la maison individuelle*, organized by the homeownership-friendly construction secretary Chalandon. His goal behind the competition was to establish a standard model for the mass production of accessible family houses for large builders *à l'américaine* which could receive state support when they fulfilled the model requirements (Steinmetz 2012). Measured against these high ambitions, the initiative most certainly failed; the about 60.000 eventually built *Chalandonnettes* units became rather known for their quality problems and their faring bad meant the state retreat from paternalistic prescriptions of construction programs altogether.

But nonetheless, between 1980 and 2014, 22% of all new individual housing units were on average built in complexes of several units (*groupé*). The petty bourgeoisie, often abandoning the *Grands ensembles* or just without other housing option, constituted much of the new demand (Cartier et al. 2008:40). At the same time, prefabricating catalogue builders and large building companies have occupied at least half of the single-family housing market segment at the expense of the artisan custom- or self-built housing circuit (Duncan/Rowe 1993:1334f; Barlow/Duncan 1994:41). Whereas catalogue builders, comparable to their German counterparts, use prefabrication techniques to reduce on-site construction to a minimum, the larger building companies such as Bouygues immobilier or Maisons Phénix, act as general contractors and still rely on contracted artisan work. These large and middle-sized builders often grew out of former builders of housing estates or public works, such as Maisons Bouygues, founded in 1979 and producing already 4.200 individual units by 1984, with 13 regional branches (Campagnac 1988:196ff). Builders such as Phénix reached more than 16.000 annual units of production and, after some concentration processes, "in 1982, the market share of builders erecting more than 250 houses per year (who represented 5 per cent of all builders) was 50 per cent of total house building, while that of the national companies, who accounted for only 1 per cent of builders was 33 per cent" (Bourdieu 2005:66). In the Toulousian region, these national builders soon occupied both lower and middle segments of the market, leaving the upper quality segment to the traditional small companies working with skilled artisans and architects, whereas artisans otherwise were reduced to relatively unskilled subcontractors of the larger firms {Jaillet, 1982 #1531:263). The establishment of this mass-market lower segment of accessible single-family houses became one of the drivers behind the French HR-increases.

Bourdieu, in his analysis of the social production field of this market, gives implicitly some hints as to why such a national market for single houses was possible to emerge in France. One reason is certainly the connection to the new modes of the 1977 government housing policy, which replaced many subsidies formerly going to housing associations by new mortgage programs addressed at individual credit-takers. The merchant builders, having particular marketing capacity (Lafont/Leborgne 1974a), included direct reference to these government loans in their offer to clients, talking them easily into burdensome loans which let houses appear accessible to broader strata (Bourdieu 2000:224). Another reason has to do with the capacity of the builders to address a national market in variations of regional style and to produce in bulk in spite of a traditional taste for solid, individual constructions:

"The image of the mason-built house has such resonance that the builders of industrial houses all have to resort to camouflaging strategies aimed at concealing the industrial components both in the reality of the houses (with purely decorative brick or masonry façades or prominence accorded to beams and all those characteristics which designate a traditional house) and the language used to promote them, which draws on the rhetoric of the 'local', the 'traditional', 'regional style' and the like" (Bourdieu 2005:58).

The tradition of state-controlled land management also left easier access to larger plots of land to the builders, as contrasted to Germany where municipalities often tried to avoid further sprawl. The large builders, in turn, often pertained to huge national conglomerates including land developers which could provide for the necessary building land at a time, when most smaller parcels had already sold out (Jaillet 1982:148ff). The traditionally weaker role of municipalities in controlling local land and building codes in combination with the external banking capital flowing into the market enabled the rise of a kind of merchant building in France, that is little seen in Germany, where at most regional middle-sized artisan builders constructing custom-built houses still dominate the single-family house market.

Conclusion

The French 20th-century HR has moved with surprising persistency between the German and the American one, as far as data can tell. The chapter, therefore, set out to explain why France diverged when compared to tenant-dominated Germany of similar welfare type, while not showing as high HRs as the US, using the same explanatory factors as in the previous analysis: urban form, financial and construction institution. As it came out, French cities, in spite of sharing European traditions of compact stone building, established a historical low-rise, stronger sprawled building structure, due to less demographic pressure, earlier defortifications, less municipal control over urban development and central-city redevelopments instead of city-extension planning. Housing finance remained in large parts in the hands of small local mortgage networks, with much locally collected capital drained for non-housing investments,

while the typically European mortgage banks only became active in housing during the booming years of city redevelopment between 1850 and 1870. Nonetheless, housing associations and state-initiated credit societies, instead of building societies, emerged which were to receive central government capital in favor of more homeownership, establishing an early government circuit in favor of lower-income homeownership. Eventually, a home mortgage and merchant building market of a mass kind emerged once the state withdrew from the large-scale housing estate construction in the 1960s, explaining the latest HR-rises ever since.

Thus, not French homeownership ideology – which was shown to be no French particularity – nor innate desires of Frenchmen to have a *chez-soi* seems to be at the origin of the higher-than-German French HR but rather long-term differences in urban politics, housing finance and construction. Significantly, at the time of high reported homeownership desires, most young French families had to enter careers of flat-living; furthermore, much of the homeownership rise in France seems to have been driven by the negative effects of rent controls, which left couples little choice than settling in smaller houses in the periphery or to buy up flats from their sale-inclined former landlords.

General conclusion

This final chapter will first summarize and sharpen the overall argument pervading the specific country-cases (1). Based on the existing material of scholars in urban history and supplementary data, the study's promise of an explanatory value-added – compared to existing accounts – is to be honored in this first section. I will then start to sketch to what extent one can hope to generalize the argument at least for other countries pertaining to the Anglo-Saxon or German-speaking country-groups (2). Finally, some lessons learned from the housing-market case for the explanations of related markets of durable goods more generally will be presented (3).

(1) The argument finalized

The starting point of this thesis has been the observation that there is a persisting homeownership gap between Anglo-Saxon countries of high homeownership rates and German-speaking low-homeownership countries, a gap that has not been closed through the 20th-century which is generally characterized by a rise of homeownership rates. Germany and the US have been chosen as exemplary cases of the contrasting country-groups. The gap does not seem to be easily explainable by economic differences or differences in the degree of urbanization of these countries. Many of the explanations citing demographic, socio-economic or policy factors succeed in explaining variations in the latest data of the last two decades, but not in addressing the question of why the major inter-country differences in homeownership *levels* emerged in the first place. A similar limitation affects the claim that countries with high social expenditures do not have to rely on homeownership and individual mortgage indebtedness as a safety valve. As plausible as it is for explaining the trade-off between welfare state retrenchment and homeownership politics from the 1980s onwards, it yet leaves unexplained why the homeownership gap rose in the first place, besides the apparent problem that welfare state and homeownership increases after WWII occurred simultaneously everywhere. The cultural explanation attributing to Germans a desire to be tenants has been repeatedly contradicted throughout half a century of surveys; a homeownership ideology has also been shown not to be missing in German politics.

The cultural explanation relies on the attractiveness of the homeownership-option which pulls the individual to wherever such an option is realizable. Across the country-studies, counter-evidence to this claim rather showed that specific moments of housing shortages and problems inherent in the private rental market pushed individuals into the homeownership direction. Such evidence has been found in the post-war and post-Depression emergency settlements in Berlin, the soon-to-be *banlieue rouge* in France and the large conversion waves of formerly rented into

owner-occupied units in the US. Wherever countries disposed of an easily convertible stock of individual houses and wherever municipalities tolerated uncontrolled suburban settlements, these shortage-situations could result in homeownership leaps. Further counterevidence has been revealed in the description of three, admittedly imperfect, natural experiments in which varying housing institutions and not culturally prefigured preferences could be shown to be the primary difference-maker: the case of the Montreal city of tenants, island in an ocean of owner-occupied Anglo-Canadian cities; the case of the homeownership-focused German immigrants in the US; the distinct structure of Alsatian, Lotharingian cities which came under German influence.

The first step taken in this thesis has been to go further back in time than the existing studies to look out for more *historic* differences, while, in a second step, the national level of analysis, if not abandoned, has been disaggregated to locate differences in the different shapes that *cities* have taken in their respective countries. Thus, the country-homeownership differences could indeed by reproduced on the city level for periods of over a century ago, suggesting that only a *longue durée* perspective could grasp the core of today's homeownership puzzle. Not the urbanization per se, but its historic timing and the ways cities responded to it were shown to be explanatorily relevant: countries differ as to whether they developed a majority of compact tenement or suburbanized cities of small houses during the important historic urbanization shocks. If cities began to sprawl into ever more remote single-family-home suburbs, then 20th-century countries containing these cities turned to be homeownership-dominated. If, on the other hand, cities expanded through compact tenement city extensions and if apartment-ownership did not spread, then countries containing these cities were likely to become tenant-dominated in the 20th-century. This begs two basic questions: what were the conditions that created rental cities and through which conditions were they maintained? I will answer each of these questions in turn.

Crucial to the argument is the building up of high-rise rental cities throughout the 19th-century urbanization whose structure became hard to circumvent and which set the expectations for similar city expansions in later periods. I identified a set of enabling conditions which explain why this kind of city emerged rather in Germany than in the United States. They should not be confused with the "critical juncture" in the strict definition of path dependence approaches because they themselves had prior causes in the feudal period, they are no product of chance but are well explainable and they are intuitively not regarded as a small event. They are mostly necessary conditions, i.e. given a rental city, one will find one or several of these conditions present. But they are not sufficient – even in the most likely case of restricted geographical location plus strong immigration low-rise rental construction might arise, exemplified by the

English “towering terraces as still survive at Todmorden and Hobden Bridge” (Gaskell 1974:88). Yet, these conditions are an important piece in the puzzle of long-term explanations of low homeownership rates.

I coarsely distinguished the feudal-heritage, on the one hand, and urbanization-period related factors, on the other. From the feudal times, many continental cities south of the historic northwest-European tenement demarcation line inherited city walls and fortifications through which cities had traditionally defended their autonomy and privileges against feudal landlords. The later formations of nation states with their national armies, defense system, national tax and custom duties set in, the later cities were dismantled from these physical growth restrictions. They thus grew in density and expanded their old towns vertically rather than horizontally. Probably more important for the spread of later tenement buildings, however, were the absolutists’ intervention into city-construction and extension between the 17th and 19th-century which set a standard of large streets bordered with symmetrically appearing higher-rise building types, occupied by the middle-classes, civil servants or officers. They became not very different from the military barracks from which later buildings of that type inherited their notorious appellation rental barracks (*Mietskasernen*). This feudal history bequeathed to the continental countries the image of representative, city-like tenement buildings, classes willing to invest and to live in them and early high rates of urban density.

Many of these conditions were absent in the earlier nationalized countries, in democratically ruled countries with strong citizenry and in countries without direct military enemies. Thus, major German city-planners such as Eberstadt (1908) or Hegemann (1930) could praise these countries for having developed and maintained a tradition of urban small-houses and the traditional townhouses of the burgher. In the US, the absence of a feudal past, though not preventing the rise of large landlords (Rachlis/Marqusee 1963; Cannadine 1980:315f), left cities largely without fortification restrictions but also without the ideal of a royal representative city with symmetric tenement buildings to be occupied by central bureaucracy servants and the military personnel. At the same time, an urban administrative apparatus with planning tradition and capacity remained equally absent in the New World.

I have emphasized in the country-chapters that these preconditions of feudal times were not yet sufficient to set cities on either the tenement or the small-house path. In Germany, for instance, city-planner contemporaries before the large urbanization wave of the Empire still estimated it feasible to extend cities through small houses (Hegemann 1930:324); the strange sight of “lone tenements” adjacent to vacant fields, as reported from Scotland (Rodger 1984:191), can also be seen on historic Berlin photographs, suggesting the development of tenements in spite of

sufficient building land. Why did German cities then prolong rather than break with the urban flat tradition in the 19th-century and why did American cities become suburbanized in turn?

First of all, economic circumstances favored small-house investments in the US where, according to the Board of Trade Survey of the 1900s, wage-to-rent levels were more favorable. Germany, as industrial late-comer and greater reservoir of cheap labor than the US, struggled to compete with lower wages which could only pay for relatively crowded rental units. This economic explanation of building types, proposed as reductive an explanation for the Scottish-British building-type difference (Cannadine 1980), is not the entire story; it cannot account, for instance, for the intra-German differences, deviant cases such as Bremen, and also cannot explain why it was the poorer Americans, German immigrants, for instance, who were more frequently urban homeowners than natives. This is why I suggested a more complex explanation that involves urban policy, housing finance and construction institutions leading to the following opposition in the extreme-case comparison between Germany and the US which I will briefly summarize in turn:

Firstly, the elements of private cities that most favor homeownership are, on the one hand, their openness to lower-end self-provided housing for the lower-income groups and immigrants that is made possible through inexistent or laxer building norms and infrastructural requirements as well as easier access to construction land. On the other hand, speculative housing entrepreneurs, using aggressively new transportation technologies, are given more leeway in the development and construction of new suburban districts, offered to the middle-classes who thus solve urban-density problems not through municipal reforms but through withdrawal from them.

Public cities, by contrast, control new and existing buildings more strictly, not allowing for lower-standard self-provision developments that come at the cost of burdensome infrastructural costs to cities at later times. Access to freely usable construction land is therefore restricted or requires directly considerable capital outlay for obligatory infrastructural fees to the community. Most local network industries are in monopolistic municipal hands, allowing for further growth only in controlled ways. Private entrepreneurs cannot therefore offer entirely private suburban solutions but are tied to existing municipal land use and extension plans.

Secondly, whereas in the 19th-century housing finance remained to a large part in traditional networks of personal credit relations, banking institutions, soon conquering mortgage markets, were initially not neutral collectors of capital usable for housing and for all possible building types, but they often earmarked collected capital for certain investment purposes. Mortgage banks, financed by the sale of covered bonds, were more likely to finance city-extensions in form of income-generating tenements: the steady income flow, fewer administrative costs for centrally operating organizations and larger sums available through the capital market made

this rental building type the complementary investment preference of this banking institution. Housing associations, in turn, directing capital collections in favor of lower-income housing, were pushed into the provision of rental housing – in spite of contrary ambitions at times – by the economic restrictions of building for lower-income groups in more costly urban areas. These housing-specific institutions emerged in Germany.

By contrast, the US developed a network of local building societies, self-administered savings clubs in favor of homeownership finance of small houses. The size and deposit-dependence of the institutions, its better knowledge of local credit conditions and its neighborhood self-help character made it the complementary institutions of small-house financing, for which its funds were earmarked, first informally and later by official regulation. Their rise in Germany was impeded by competing institutions, the pre-existing network of savings and cooperative banks as capital collectors and the housing associations as builders. Their belated rise in "continental form" explains the lag in homeownership development in Germany.

The decomposition of residential mortgage volume in countries into the different volumes issued by different housing finance institutions nuances the often heard claim that household mortgage indebtedness expansion per se explains necessarily higher homeownership rates, insinuating that it suffices to look at the level of mortgage indebtedness of a country to explain its level or variation in homeownership. The comparative history of covered-bond financed mortgage banks in Germany and France and the savings and loans in the United States should sensitize to the fact that it apparently matters for the resulting building type through which institution possible housing capital is channeled. Thus, not the mortgage volume per se but the volume earmarked for homeownership is the pertinent factor.

I have argued that this second institutional difference between countries, namely having developed either 19th-century building societies without non-profit housing associations or mortgage banks with non-profit associations and only belated building societies, determined the course that housing policy was to take in the respective countries, once post-war or post-Depression housing crises demanded interventions. In the first case, American case intervention mainly took the direction of supporting the housing *finance* sector, through temporary bail-outs and a public mortgage insurance system as well as the public organization of a secondary market. The general absence of adequate local non-profit housing structures forced the government to set up public housing itself through direct intervention up to land purchases, making it merely a residual circuit under close public scrutiny. In the second case, German case government intervention took the form of building subsidies for the non-profit *housing* companies ever since the 1920s, whereas the particular cooperative form of building

societies set the 1950s' government focus on subsidizing the ex-ante savings, not exempting debt service from taxes.

Thirdly, Fordist mass construction of standardized products is behind the spread of many consumer products in the 20th-century in the US, in form of large-scale on-site construction of many prefabricated parts by community builders and the entirely prefabricated mobile home construction. Though accompanying the homeownership increases of the 20th-century, it finds its technical precursors in a wooden construction culture ranging back to the 19th-century. The savings through economies of scale and more unskilled labor allow for a cheaper provision of more units, thus bringing also lower-income groups in the range of homeownership. Collaboration with savings and loans as well as the easier private development of suburban communities makes Fordist building of homes the complementary construction institution of small homes.

In Germany, by contrast, mass production principles have hardly been used outside the rental housing construction sector, while artisanal construction of individually demanded custom-built homes has remained the dominant mode of housing provision. The final product becomes more individualized, is produced by higher-skilled labor and is built at individual and not at merchant-builder command; it thus comes at a higher price and can accessed only at a later age, financed by longer ex-ante savings, or not at all.

Table 11: Country-specific matrix of explanatory factors

	US	**Germany**
1. City type	Private city	Public city
2. Housing finance	Saving and loan societies	Mortgage banks and housing cooperatives
3. House construction	Fordist	Artisanal

Whereas the combination of these institutional factors explains much of the initial rise of the different city types, they do not necessarily explain why homeownership differences between the countries have not dramatically changed. England and Wales, for instance, and later even Scotland started from an equally low homeownership level as Germany and yet overtook American numbers in the second half of the 20th-century. With reference to the path-dependence literature, I identify both a power- and a functional mechanism that perpetuate the established physical and institutional structures (Mahoney 2000). At the same time, reinforcing mechanisms alone would have difficulties to explain the overall increase of both American and

German homeownership rates after WWII, which is why I turn to layering through further suburbanization and conversion of existing rental units as explanations of institutional change.

The once-built physical building structure is difficult to replace and only reversible by major government slum-clearance programs, traditionally rather known in the US and the UK. The fragmented property interests are difficult to organize and the municipal building codes and zoning laws are important carriers of preservation. If a building in a built-up area needs replacement, then it obeys the laws of conformity. Otherwise, the economic imperatives themselves would demand a construction of at least identical land-use intensity. These same restrictions do not have to apply, of course, to the new construction in suburban areas, but a number of factors suggest that even there no *tabula rasa*, independent of the existing structure, exists. In German city-extensions during the Empire, the existing building code was simply extended to the areas of new construction, thus allowing for the same high-rise buildings as within the former city. As the new constructions had to compete with the old ones in terms of mortgages and user demand, the existing stock became the yardstick against which new housing units were measured. Mortgage banks expected an equal return from suburban land than from existing one, small impotent builders were simply accustomed to supply the already known constructions (Grebler 1950:75) and the middle-class soon residing along the new boulevards did not have to change its housing habits. The city, provider of most public works and services and thus sensitive to their costs, tended to restrict exuberant area growth to exploit the capacity of existing networks.

Most major new construction periods over the last 150 years were reactions to sudden demand or supply shocks in form of urbanization waves or war destructions. As the time for elaborate responses was limited and pressure to solve the housing crises haunted politicians, the most functional way to respond was to rely on the existing construction apparatus. Thus, in Germany, the number of rental unit output increased each time a scarcity situation was imminent, the last time after the unification.

Besides these functional-economic mechanisms, mechanisms of power exercised by the relevant interest groups of each housing sector have played a preserving role. The social-housing and the homeownership circuit became a cleavage line in most countries, with left-wing, social-democratic parties, the organized large cities and unions aligned for the former, while conservative parties spoke for the latter. As demonstrated, this cleavage line was clearly established in Germany but much less so in the United States, where homeownership-policies became a party-transcending issue. But with social democrats embracing rental housing construction in times when the private rental sector lay down, the new rental housing stock was politically extended.

One important difference between the German conservative party and those in other countries such as the UK (Daunton 1983:294ff) is the continuous conservative support for the private landlords which can be interpreted as another facet of the accommodation of the *Mittelstand*, a class often possessing small property. Whereas in other European countries social democrats focused on social housing, tenant support and possibly homeownership, conservatives furthered the homeownership solution with the minority landlord class falling into a political void. In Germany, the lenient treatment of old town areas, lenient when compared to British slum clearing or Haussmann's expropriations, but also the post-wars mortgage debt reliefs after the inflations as well as the comparatively rapid return to higher-than-pre-WWI rent levels are expressions of a private-landlord favoring policy which was renewed by conservative governments after WWII in the form of special subsidies and depreciation-related tax exemptions for private rental construction. At the same time, these subsidies were often made in return for legal concessions that landlords had to give into concerning tenant protection and rent price increases.

While these functional-economic and power-mechanisms, existing physical and institutional structures tended to cement the once created differences, the conversion of the existing into owner-occupied stock and suburban layering contributed to circumvent the historical obstacles. In Germany, these processes of institutional change did not reach an extent that would have permitted the closure of the homeownership gap. The conversion of private and public rental units was mainly restricted through the established rights of sitting tenants that made the conversion process itself burdensome for landlords and created limited demand for owner-occupation. Also for this reason, multi-unit buildings seem to be more difficult to convert into owner-occupied ones. The political support for landlords and profitable rents did not necessarily incite many landlords to sell their buildings. Compared to 1950, however, today's urban apartment-ownership rates have considerably increased, also thanks to high percentage in new construction, which explains parts of the homeownership increase ever since. At the same time, suburbanization was the main driver behind most 20th-century homeownership increases. Whereas the restricted municipally controlled land offer in Germany and the absence of large single-family merchant builders made slowed the speed of this mode of institutional change, it became the city-building process *par excellence* in the United States from the 19th-century onwards.

(2) Generalization over cases: Anglo-Saxon vs. central-continental housing regimes

The study started out from the opposition of Anglo-Saxon and German-speaking countries in the comparative housing literature and it chose exemplary cases of each group to reveal more

causes in the respective historical trajectories. The individual-case-study results should therefore be also measured against their potential to generalize across countries of the respective groups. A complete generalization with equal historical dimension must, of course, be left to further studies as no ready-made databases exist for such a quest; some references to existing works in other countries shall therefore suffice to suggest the plausibility of such a generalization.

Though I follow this general logic of comparative political economy, welfare or housing research, my findings urge me to mention two caveats concerning the generalization: first, the longer historical explanations range, the less can one expect similar occurrences in each sequence. A generalization therefore does not have to imply that institutions of the exact kind at the exact same time arose simultaneously in all countries, but one should have a certain level of tolerance which includes institutions of only functional identity and comparisons of only roughly identical historic time periods; secondly, my study relied strongly on the urban level of analysis, thus diverging both from mainstream political economy or housing literature which compare nations and from most urban (history) studies literature which deal with singular cases or two-case comparisons. On the one hand, my findings do not suggest a complete overhaul of nation-based comparisons as I found, with respect to housing-relevant parameters, relatively homogeneous clusters of cities for each country and even for country-groups, besides the certainly not negligible variation of cities as different as Bremen and Berlin or New York and Los Angeles. On the other hand, they nonetheless suggest that factors below the national level carry much explanatory weight and that inter-country comparisons rely too much on averages which even out important differences on the urban. Thus, cities like Copenhagen, Strasburg, Vienna, Stockholm, Prague or Polish cities are likely to show many of city-planning and mortgage banking characteristics singled out for German cities, which however get lost in national averages. Moreover, the fact that country-specific city types already existed in the 19th-century and that, within countries, urban housing stock is quite inert also discredits those explanations of differences on the national level that rely on national-state interventions in the 20th-century housing market.

These caveats made, cities of German-speaking countries or those within their historic sphere of influence share many of the characteristics found for German cities proper. They fall south of the northwestern European demarcation line that separate the tenement from the small-house cities and cities like Vienna, by the 17th-century, already showed a renter-landlord relation of 7:1 (Lichtenberger 2002:198). Belated city defortification, an aristocratic rule of cities, incorporation movements disciplining suburbs and a bourgeoisie interested in rental-housing investment were also typical features of urban Switzerland in the 19th-century (Walter 1994).

With the restitution of private rental properties in countries such as Poland and the Czech Republic, some of these century-lasting urban traditions might even emerge as it did in Eastern Germany after the long interlude of socialism (Lux/Sunega 2010). The historic sequence of 19th-century developments of limited-profit housing associations, rental-housing financing mortgage banks and savings-monopolizing savings banks and 20th-century belatedly emerging specialized building societies is paralleled by the Germany's neighbors which copied the German *Bausparkassen*-model in the 1930s (Deutsch/Tomann 1995), even if much less in capital-rich low-interest-rate Switzerland (SBG 1979:30). One of the persisting features of this continental model is the relatively high share of equity which households bring along and save prior to entering homeownership at an above-average age. Also revealingly, mortgage banks based on the sale of covered bonds remained absent in the small-house dominated Belgium (Doling/Elsinga 2013:33). In Switzerland, conservative building codes and little prefabrication impeded the rise of large-scale construction of single-family homes and produce an even higher house-price-to-income ratio than in Germany (Bfai 2005:425).

The English-speaking must be divided into the colonial motherland and its former colonies. Whereas the institution of speculative small suburban house construction financed with the help of building societies exists throughout all these countries, with the above mentioned exception of Scotland, the technical culture of wood and wide absence of public housing remains a particularity of the former colonies. It is revealing that the first international congress of the building societies that included the promotion of homeownership in its constitution was almost exclusively frequented by members of the English-speaking world (Price 1958:454ff). In most English-speaking countries these institutions became the main financers of homeownership expansion (Donnison/Ungerson 1982:212), making up 35% of the 20th-century Australian market for instance (Kemeny 1983:17f), whereas an independent tradition of non-profit housing cooperatives is largely absent (Kemeny 1981:10). Both the Australian urban development and the "Australian Home" have been compared in its wooden, suburban, single-family style with their American counterpart (Boyd [1952] 1977; Frost 1991). The close alliance of needy farmers and workers in favor of homeownership has also been found in the Canadian case (Harris 1984:28) and the left-wing or Labor-Party in Canada (Harris 1987a) or Australia (Kemeny 1983:3) have supported homeownership ever since, with only small interludes in favor of public housing. For Canada, large-scale merchant building of single-family houses has been equally established as in the United States and in spite of continuing public transport and further incorporations in Canada, suburbanization has taken the same direction as in the United States, even slowly evening out the aforementioned Toronto-Montreal homeownership gap (Harris 2004:16).

Thus, non-systematic evidence on urban history, housing finance and the construction sector seems to confirm that with respect to these institutions there is a prima facie similarity between the countries of each of the selected groups.

(3) Generalizing the explanation type: towards a sociology of markets for durables

The study has foremost attempted to give an answer to an established empirical puzzle by giving singular historical explanations. In a further step, the previous section tried to make plausible how relevant variables in the singular cases might allow to generalize over cases of similar kind. In this ultimate section, I try to generalize even further by considering the specific phenomenon under study, i.e. the status of tenure in the housing market, as a subcase of a specific type of markets, i.e. the markets of durable as opposed to fast-moving goods. The crucial difference is that goods of the latter type perish in more or less instantaneous consumption, whereas others remain part of the overall offer. Contrary to the usual narrow use of the distinction which puts consumer goods like vacuum-cleaners or cars into a different category than ice-cream, I use it in an extended sense for markets including markets for industrial machinery, utilities, labor or firms and, based on my single study about one kind of these goods, I will point to some particularities that an explanatory sociology of durables would have to take into account.

A first and the most evident feature of durables is that they survive the moment of their purchase and that they conserve their consumption and possibly investment value for the buyer and possibly other buyers. The durability also allows for the conservation of value through time and durable goods can thus often be bought for consumption and investment reasons which can possibly conflict with each other. This implies that any new offer coming on the market enters a competitive relationship with a secondary market of an existing stock of goods of the same kind, given a certain turnover (Stroeker 1995). The longer a good can be in use, the larger the secondary market becomes and the fiercer is the competition of the new entering units. For a sociology of durables this implies that the study even of present-day phenomena is by necessity backward-looking and historiographical.

Secondly, as the durable objects persist through time, the possibility for different forms of tenure opens up because the owner and actual user do not have to coincide. A variety of legal forms of ownership is imaginable and an equal variety of factors can determine which form of tenure will eventually prevail in their internal competition. The more durable the good, the more likely it is that changes in the form of tenure cannot be achieved through the tiny percentage of new entrants into the market but through the conversion from one form of tenure into another within the existing stock. Not surprisingly, therefore, in the study of housing,

conversion has been identified as a major form of institutional change. For a sociology of durables this implies that alternative forms of tenure, their change over time, space or social groups are phenomena of study and that conversion is a likely candidate for the explanation of institutional change.

A third feature concerns the fact that, as primary and secondary market compete for a similar demand, the existing offer is the yardstick against which new offer has to compete. Besides the fact that in each new period, the existing stock, one period older, is still on offer, thus creating already a certain inertia, it moreover restricts the range of possible new offers through the competition with the existing one. Some processes yielding this preserving effect, revealed in the study, are legal prescriptions about specific properties that the new offer has to comply with, interest groups in control of the old offer alert of too dangerous new competition and cultural expectations growing around the old offer. Relevant interest groups can particularly be those in charge of maintenance and repair of the existing stock which can even outweigh the new production in business volume. On the consumer side, this can also mean a possible stratification of demand along the age of products, with demand for new units triggering possible vacancy chains and filtering-down processes. For a sociology of durables the competition with a largely existing secondary market implies that its object of study is not only a reflection of considerable historical time spans, it also tends to remain inert through time. It also implies that the mode of institutional change, may it concern the form of tenure or any other property of the good under study, is likely to take place in gradual layering.

Durables are, fourthly, prone to be subject to considerable fluctuations in the new production and this for two reasons: first, as most offer comes from the existing stock, even small demand or supply shocks fall back on the new production which is relatively small in relation to the entire market and the new demand so that a doubling of production is no rare phenomenon. These initial shocks – urbanization shocks, the pent-up post-war demand, baby- or divorce-booms or periodic government interventions in the case of housing[50] – generates a bias in the age-structure of the future stock translating into repeated supply shocks at the end of the goods' lifecycle. The second reason for higher production volatility lies in the time-lag that exists between the production start of durable unit at t_0 and the first offer at t_1; given high prices at t_0, the individual producer might be tempted to produce more, not considering the additional units other producers provide at the same time up to t_1 at which point the prices are lower than at t_0. The lure of initially high prices thus leads to an oversupply and subsequent cyclical

[50] See (Drost 2002) for theory and evidence about labor market cycles.

behavior of new production. This result is even more probable as the higher capital-intensiveness in the production of durables might lead to a more fragmented and therefore uncoordinated offer. For a sociology of durables the fluctuation phenomenon suggests, on the one hand, a special attention to distant historical events that stratify the cohorts in the existing stock into different layers and that have regular repercussions on new demand. On the other hand, determinants in the formation of individual producers' expectations are particularly crucial to understand the recurring cycles of oversupply and scarcity (Beckert 2013); high hopes about possible future boom-towns in the American West could create the biggest land bubbles (Sakolski [1932] 1966) and the pessimism reigning in shrinking cities can further cut back construction.

Finally, the often more complex production of durables but especially the historical nature of the existing offer, its lower turnover and the lower transaction frequency over individuals' life course creates the problems of quality evaluation that Akerlof famously brought up for the secondary market for cars (1970). In the case of housing, once-in-a-lifetime transactions and even cross-generational ownership are nothing rare and the plurality and little entrenched house price indices also result from difficulties to assess the existing latent offer. For a sociology of durables this implies that it has to deal particularly with the problem of how value is determined in markets (Beckert 2009).

Table 12: Particularities of a sociology of durables

	Durable goods	*Non-durable goods*
Supply	Split between primary and secondary market	Primary market only
Tenure	Direct ownership or leasehold	Direct ownership only
Mode of change	Generally inert, change through conversion within stock or layering around stock	Dynamic, change through direct replacement
Competition	Disciplined by existing stock	Between new products only
Market behavior	Proneness to production cycles	More stable production
Transactions	Rare	Frequent
Quality	Difficult to assess, intransparent	Easier to assess, more transparent
Approach	Historic analysis	Standard analysis
Methods	Cohort, event, sequence and time series analysis; analysis of historic institutions	Standard market analysis

While the study of the historical development of homeownership rates has only seriously addressed the first three features outlined for a sociology of durables by tracing the different historic layers and events reflected in today's housing stock across different countries, further enquiries about the evaluation- and volatility characteristics of markets for durables do seem promising.

Appendix

1) German city data analysis

OLS-regression percentage of buildings containing 9 and more housing units in 86 German cities in 1912:

	Coefficients	*Std.Error*	*t-quotient*	*p-value*	*Signf.*
Longitude	**0,0331337**	**0,00455368**	**7,2763**	**<0,00001**	*******
Inhabitants	3,19788e-07	7,56602e-08	4,2266	0,00006	***
Area	7,11688e-07	5,01431e-07	1,4193	0,15964	
Tax income p.c.	-0,00213679	0,00124739	-1,7130	0,09054	*
***Sparkassen* books p.c.**	**-0,303861**	**0,0898694**	**-3,3811**	**0,00111**	*******
R^2					0,722243

Source: (Hühner 1998; GeoNames 2013)

OLS-regression (n=23) on percentage of buildings with nine and more units

	Coefficient	*Std. Error*	*t-ratio*	*p-value*	Sign.
constant	-3.38806	1.88666	-1.7958	0.08845	*
Year of started defortification	**0.00162048**	**0.00104436**	**1.5516**	**0.13724**	
Population	2.79466e-07	8.63296e-08	3.2372	0.00434	***
longitude	0.0595578	0.0128662	4.6290	0.00018	***
R^2					0,73

Source: (Hühner 1998; Mintzker 2012)

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