Assessing inclusionary zoning for Wellington City Council housing

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SENSE PARTNERS
DATA LOGIC ACTION

Key points

High cost of housing is pushing councils to seek alternatives to improve housing affordability

- Like elsewhere, Wellington City has experienced rapid increases in the cost of housing.
- House prices have increased 84 percent over the past five years alone.
- Rents are up too: MBIE's rental bond database suggests rents are up 38 percent in the past 5 years.

Existing policies have failed to shift headline prices – inclusionary zoning appeals as an alternative

- Status quo policies have failed to shift the headline rate of house price inflation.
- Changes to zoning regulations, directed from both local and central governments, will continue.
- Inclusionary zoning appeals as a new strategy that meets needs of those excluded from housing.

Inclusionary zoning comes in different flavours

- At its most basic level, inclusionary zoning requires that a fraction of new construction dwellings are set aside to provide affordable for people on low incomes.
- Inclusionary zoning can by voluntary – where developers opt-in for inclusionary zoning in return for waivers of consent fees land use restrictions on density, height restrictions or density, or mandatory, where developers must construct additional dwellings or pay a fee for exemption.
- Environment matters – the literature suggests outcomes are dependent on both the type of inclusionary zoning, the geographic coverage and timing of the policy.

Inclusionary zoning can have unintended consequences of raising house prices – you need a full CBA

- By definition, mandatory zoning inclusionary zoning increases the cost of providing housing units reducing profits. Developers could respond by building new dwellings in jurisdictions without mandatory zoning – so outcomes are contingent on policy settings across the Wellington region.
- If market conditions are tight, and supply unresponsive to price signals, developers might recoup the cost of inclusionary units by increasing the prices of the units delivered to market.
- Developers might also try to recoup lost profit by reducing costs by reducing quality and prices paid for construction, including land prices – you need a cost-benefit analysis to test the viability of housing supply under a range of assumptions about the inclusionary zoning scheme.
- International experience suggests no impacts on rents, house prices and first-home buyers outside of households that can directly access any affordable housing inclusionary zoning provides.

It is critical to identify who affordable housing is for – what is the problem definition?

- If successfully implemented, inclusionary zoning produces affordable housing for those that can access the scheme. But this requires a definition of "affordable". When 53 percent of Wellingtonians own their home – not owning a home is mainstream.
- Even well-implemented inclusionary zoning policies produce only a small fraction of homes relative to the housing stock.
- Without allocation rules, affordable housing will be over-subscribed. Allocating housing to social housing providers could best meet needs for the "missing middle", assisted housing market.
- Instead of providing housing at a set price point, providing housing units to assisted housing providers that can provide a range of housing products dependant on identified needs.

Other policies could realise affordable housing without the delay inclusionary zoning implies

- Inclusionary zoning makes it more expensive for developers to provide more housing.
- When housing supply is extremely inflexible and unresponsive to price, then inclusionary zoning could extract value.
- But expect flexibility to change over the business cycle – in recessions expect inclusionary zoning provisions to make for larger cycles in residential construction.

- Inclusionary zoning will take many years to reach sufficient scale to have the impact broader base policies are likely to provide.

Approach should be careful, setting clear and monitorable goals, learning what works first and complement other existing policies, before ramping up over time

- Inclusionary housing can make provisions of some housing more expensive, risking unintended consequences. So start with modest goals and pilot studies that could ramp up over time.
- Inclusionary policy needs to be flexible and responsive to learning what works. Since the develop and build process takes several years, aim for success over the long-term.
- Inclusionary zoning should complement rather than act as a substitute for other policies that aim to improve supply of housing.
- Inclusionary zoning will take many years to reach sufficient scale to have the impact broader base policies are likely to provide.
- Set a clear measurable goal and for inclusionary housing in order to monitor performance

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Context

Sense Partners were asked to provide a short, qualitative brief to Wellington City Council on the impacts of new mandatory assisted housing rules. These rules would seek to increase the supply of housing by requiring a certain portion of new houses in large developments to be assisted housing. Council's objective is to increase the supply of housing to the assisted housing market.

1. Problem Definition

The growing cost of Wellington's housing

Over the past decade, housing has become seriously unaffordable for Wellington residents. House prices have increased 84 percent over the past five years alone. Rental costs are up 38 percent over the same period and even the lower quartile house price ($628,000 in March 2021) is beyond the reach of most people. 53 percent of the Wellington residents owned their home in the 2018 census. Home ownership could also be expected to have decreased over the past three years.

Wellington is not alone. House prices have increased not just nationally but globally too. In part, this is due to much lower mortgage rates. Population ageing has produced a glut of savings that has reduced real interest rates globally. The response to COVID-19 has only exacerbated the availability of credit that has pushed up house prices in most OECD countries. Nationally, ten percent population growth in the space of five years has pressured demand.

Supply matters

But Wellington's housing supply has failed to keep up with the pace of growth. Geographic constraints limit availability of land but recent measures by Wellington Council to free up land will not be developed fast enough to dent house prices in the near term.

Upzoning under the National Policy Statement for Urban Development will help, but infrastructure costs are likely to limit what is possible in the medium-term.

So, to moderate the impacts of high house prices, it's not surprising Wellington City Council is looking to Inclusionary Zoning as a new tool to help ameliorate on people who are effectively priced out of how ownership despite efforts by local and central government and other housing providers to increase the supply of affordable housing units.

Could Inclusionary Zoning help?

Inclusionary zoning says that a specific fraction of any newly constructed dwellings should be set aside to be affordable one low incomes. Inclusionary zoning is increasingly used in the United States since the big appeal of inclusionary zoning is that it does not require new outlays of spending by councils. Instead, developers must pay for the costs of providing the additional units.

But inclusionary zoning comes in many flavours. One of the critical decisions with inclusionary zoning policy is determining whether inclusionary zoning is *voluntary* – such that developers can opt to produce affordable units in exchange for relaxation of restrictions, such as height limits, setbacks and density restrictions, or *mandatory,* such that the developer must supply either extra dwellings or pay a fee in lieu of providing affordable dwellings.

But making developers provide affordable dwellings effectively acts as a tax on development, increasing the cost of housing. So, a critical element of any inclusionary housing policy is determining how developers are likely respond to the inclusionary zoning policy.

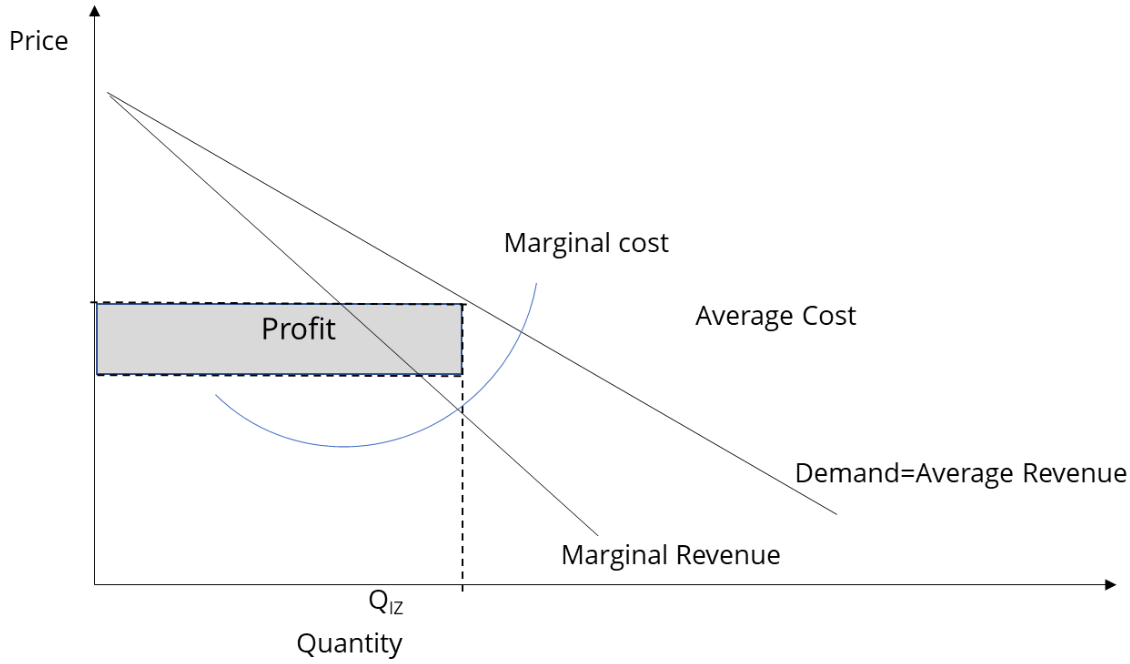
Jurisdictions also need to provide clear direction on who the policy is targeted toward. There are many definitions of affordable housing. So almost by definition, many people will be excluded from the opportunity to purchase any affordable housing. Council needs to be clear on how affordable housing is allocated and rules around resale of affordable properties that could otherwise realise windfall gains.

2. How does Inclusionary Zoning work?

What is Inclusionary Zoning?

Inclusionary zoning works by requiring developers to supply affordable housing units instead of the units the market would be provide. If developers are working in a highly competitive market, then inclusionary zoning cannot work – developers would find it uneconomic to construct any housing units.

FIGURE 1 MANDATORY INCLUSIONARY ZONING REQUIRES MARKET POWER PROFITS



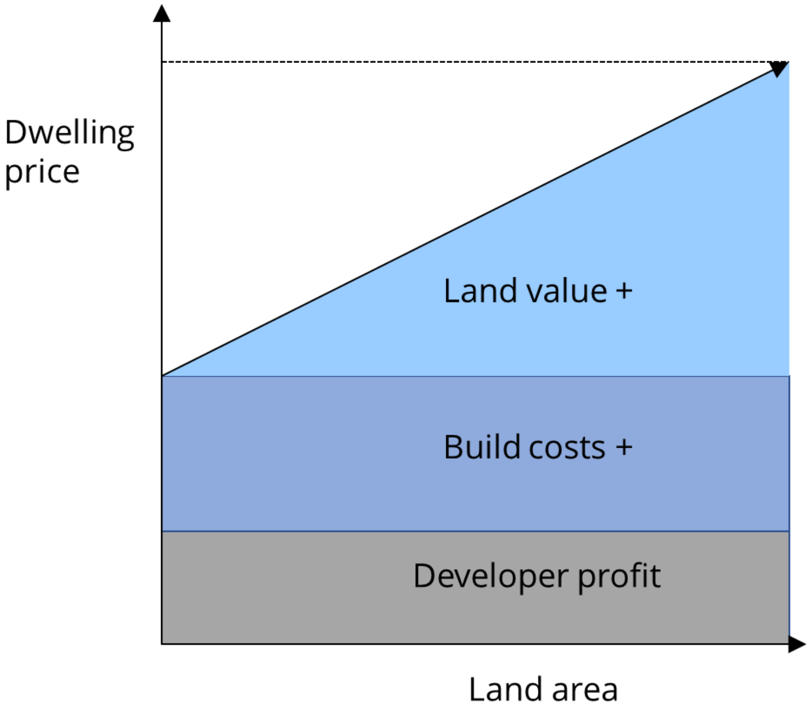
In the absence of any market power, competitive pressure forces developers to set prices at marginal cost and miss any market power profit. Under these conditions, requiring the production of affordable housing units reduces the supply of new housing and increases prices. So, it is critical to understand the extent to which developers earn profits more than competitive markets.

Property development does not appear to be an industry with a high degree of market power. Although the industry is capital intensive, firms can enter and exit freely. One of the defining features of property development is failure of companies – even in boom times. So, there is little to suggest property developers exercise large degrees of market power.

Developers also have cost structures that reduce the size of any profits that arise from monopoly power. Figure 2 shows that the price of a dwelling includes not just developers profit but building costs and land costs that are often subject to land-banking that pushes up input costs for developers. Land bankers do exercise market power.

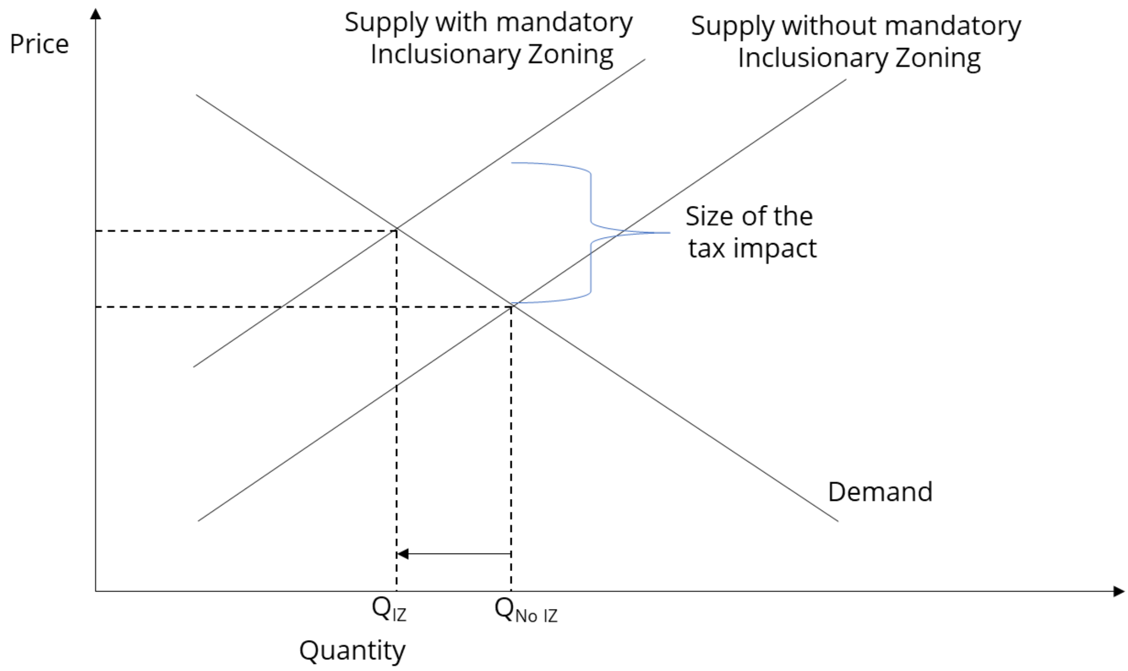
Council might want to look at policies that reduce the market power of land-banking (such as charging rates on a land rather than capital basis) before implementing inclusionary zoning policies. Developer's costs may increase in the short run under inclusionary housing requirements but since developers cannot pass on those costs to homebuyers, land prices fall since it is more costly to produce housing.

FIGURE 2 DEVELOPERS COSTS INCLUDE LAND VALUES THAT ARE SUBJECT TO LANDBANKING



The requirement to supply affordable housing acts as a tax on development. Since the local market sets the price of housing, developers are constrained from simply increasing the price of units developed for the market. Instead, developers can respond in a variety of ways: (i) seek to reduce costs and sometimes quality of market properties, (ii) seek to reduce the costs of inputs, (iii) take a cut on any profits, (iv) reduce the supply of housing, since it is now more costly to supply the same amount of housing. Supply is reduced and as an unintended consequence of inclusionary zoning, the cost of housing can rise for many (see Figure 3).

FIGURE 3 IMPOSING INCLUSIONARY ZONING CAN REDUCE HOUSING SUPPLY



Alternative funding models also drive differences in incentives, methods and ability to supply assisted housing for developers that rely on bank funding versus developers that use their own financing. Developers with their own cash flow may be able to pay fees up front in lieu of housing, whereas developers with bank funding may want to provide the fee once the development is complete.

Property rights

One way to think about inclusionary zoning is to think about the marginal benefit to the community against the marginal benefits to the developer more less restrictive inclusionary policies and less inclusionary policies. Figure 4 is from William Fischel and shows that the starting point could matter for who pays for inclusionary zoning.[1] makes the point with highly stylised marginal benefit curves that show landowners have property rights that are reduced when inclusionary zoning imposes restrictions on what land can be used for. Moving from B to A reduces developer and landowner benefits but increases community benefits.

Regulations that merely restrict the use of property are generally not considered "takings", regulations that deprive landowners of the economic use of land. But this suggests limits to inclusionary zoning policy. The issue is not unique to the United States since origins of the legal systems of Canada, Australia, the United States,[2] and New Zealand have many similarities.[3]

FIGURE 4 INCLUSIONARY ZONING REDUCES TRADES DEVELOPERS FOR COMMUNITY BENEFITS
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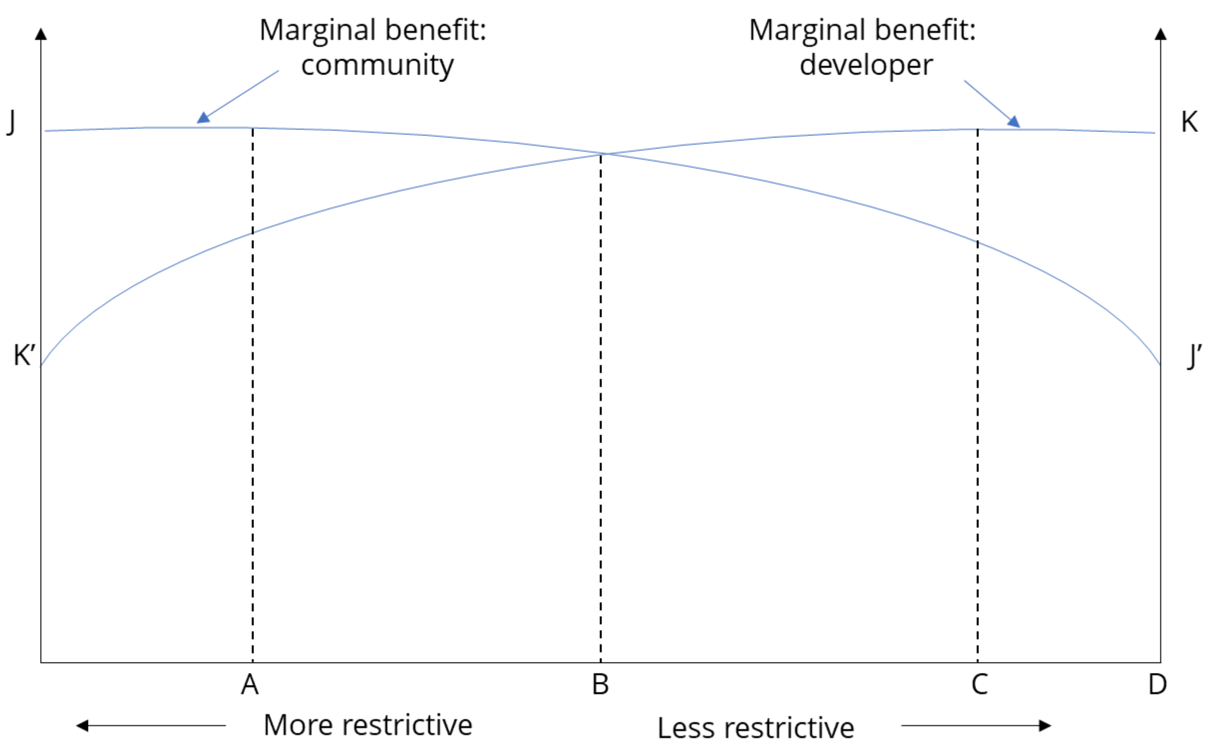

[1] Fischel 1987.
[2] See Christie 2007 and
[3] Guerin 2002 and 2003 provides insights in the policy issues for New Zealand.

Flavours of inclusionary zoning

One of the defining features of inclusionary zoning is the multitude of different features it can take depending on local characteristics of each city.

What fraction of affordable units and offsets for smaller developments?

Moving beyond the decision of whether a particular inclusionary zoning scheme should be mandatory or voluntary, key decisions also includes the number of affordable units the developer needs to provide. This is usually specified as a percentage of total development across a range from anywhere between 10 percent of units to thirty percent of units. Since mandatory inclusionary zoning acts as a tax on housing supply, setting the fraction of units for inclusionary zoning towards the upper end of this range appears risky – it could dampen provision of market housing with the unintended consequence of material increases in the market prices of new housing.

Moreover, it is not clear that developers always reap a monopoly profit from development. One of the defining features of development in New Zealand is developments often fail. So, developers seek higher profits in return for the riskier nature of development. Any setting of inclusionary zoning needs to account for the risk-return incentives developers face.

Wellington City Council will also need to decide on the minimum size of the development that inclusionary zoning applies to. The experience of the United States suggests that more flexible arrangements tend to increase housing supply the most. [4] But inclusionary zoning does not necessary increase the amount of new development.[5] Notwithstanding the experience of Auckland and Queenstown Lakes District Council,[6] inclusionary zoning is relatively new in New Zealand's metropolitan areas. It is difficult to draw much from international experiences.[7]

A cautious approach, that allows some flexibility, is likely to be warranted to avoid undermining the market provision of housing. That suggests allowing small developments (perhaps under ten units) to proceed without requiring provision of inclusionary housing units or a fee in lieu of production.

Fees in lieu of constructing affordable housing units?

Fees in lieu of production demonstrate most clearly the taxation element of inclusionary zoning. In-lieu fees provide councils with flexibility – funds can be used to supply more units elsewhere across the city.[8] But in the absence of regulation controlling the use of fees collected, using in-lieu fees implies supplying fewer affordable units in high amenity areas.[9] In-lieu fees can also mitigate risk of reducing housing supply by setting the rate with buffer that allows for errors in setting the in-lieu fee too high, restricting the provision of market housing.

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[4] The Furman Center 2008 found evidence that programs in the San Francisco region that exempt smaller projects or provide density bonuses produced more affordable housing units.

[5] See Schuetz, et al. 2011.

[6] See Eaqub 2017.

[7] Powell and Stringham 2004 and Basolo and Calavita 2004 show some of the international research on inclusionary zoning is highly contested and the US literature also responds to segregation issues, see Brown 2001 for example and Calavita and Grimes, 1998.

[8] Thaden and Wang 2017 report in-lieu fees of $1.7 billion in the US that can be used affordable housing.

[9] Regulation could specify fees need to be used to supply housing units sufficiently in specific areas.

In principle, the in-lieu fee should be set close to the cost of marginal cost of producing the affordable dwelling. Three methods are suggested to set the fee:[10]

i) affordability gap method – the gap between the market-value price and what a low-income household can afford. This method would rely on local data, such as the construction of the Wellington Housing Affordability Monitor, to assess incomes.

ii) production cost method – this is the gap between the cost of constructing a comparable affordably unit and the income the developer receives from the affordable unit.

iii) indexed fees based on project characteristics – a range of other approaches are used internationally including setting the fee based on the floor area of the unit and the density of the development (with high density developments attracting higher in-lieu fees).

If Wellington City Council proceeds with inclusionary zoning, expect to need to build an evidence based to test what the market can bear without reducing housing supply. Some developers would likely prefer the "developer tax" in the form of an upfront fee, while others would prefer it in the form of free/discounted housing units once developed. There may still remain timing impacts of the feed that have different incentives with regard to the number of housing units provided that council would need to consider when setting any in-lieu fee.

Affordable for who?

Critical to success of any inclusionary housing policy it to define the income-level, and the house price level that follow as "affordable". Given New Zealand's current high house prices and low-income rates, any affordable housing will be heavily oversubscribed. Council should be aware that affordable housing policies will exclude many people on a quantity basis over the short- to medium-term.

Council will also need to take a stance on the size, prices, and quality of affordable housing. If councils want to target shifting outcomes for the most vulnerable, this favours providing large amounts of low-cost housing rather than providing inclusionary housing that has the same quality characteristics as housing provided by the market.

Council will also need to set the price of affordable housing units. The Wellington Housing Affordability Model can provide guidance that tracks a range of prices back to definitions of affordability already in use by council. Expect affordable housing units to be priced at a significant discount to current market rates. This shows the cost to developers of supplying affordable housing units.

Acquiring affordable housing provides a windfall gain to purchasers. Without restrictions on on-selling affordable housing units, expect sales of affordable housing to occur. Wellington City Council will need a judicious set of rules on on-selling that preserves the benefits of homeownership without reducing mobility of households locked in to affordable housing. Alternatively, affordable housing could be provided directly to assisted housing providers. These choices are non-trivial but heavily impact on the ability of any inclusionary zoning program to improve housing affordability.

What is the evidence?

The evidence on inclusionary zoning largely stems from the US literature although Gurran et al. 2018 provides discussion of the experience of inclusionary zoning in Australia.

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[10] See Shroyer 2020.

In Australia, the states limit the extent that mandatory inclusionary zoning can be applied at the local level. Density bonuses are used widely, and the developers is regarded as generally supportive of the policies. However, housing supply outcomes have been modest to date.

In the US, the evidence of Inclusionary Zoning's impact on the private market is far from clear. There is no consensus on whether the policies restrict development or raise the price of market housing. [11]

One analysis of inclusionary zoning programmes in San Francisco metro area found that more flexible including zoning areas produced more affordable units.[12] Inclusionary housing in San Francisco area tends to allow developers to pay in-lieu fees rather than requiring developers to build new affordable units themselves.

But for others, inclusionary zoning is found to increase house prices. MacDonald 2016 finds that Oakland's inclusionary zoning policy would reduce total product by 6-12 percent, and reduce revenue from taxes and fees by 6 to 19 percent. The proportion of below market housing built in the city increases from 4 to 11 percent.[13] For the case of California, Knaap, Bento and Lowe 2008 found inclusionary zoning increased costs in higher priced markets.

Many IZ policies produce affordable units but IZ is not a panacea for solving a community's housing challenges."[14]

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[11] See Ramakrishnan et al. 2019. Schuetz et al. 2011 report higher prices and lower rates of housing production during periods of regional house price appreciation in the Greater Boston area and no effect of Inclusionary Zoning on new housing development in the San Francisco Bay area.
[12] Furman Center 2008.
[13] Furman Center 2008.
[14] See Furman Center 2008.

3. A CBA is needed

Towards a conceptual Inclusionary Zoning framework

To work up estimates of the supply of multi-unit housing under the inclusionary zoning framework, Wellington City Council will need a CBA that works through a developer model of the viability of a range of development types, under a series of market conditions and different underlying cost assumptions, including for example, development quality. This analysis is necessary to understand the likely impacts of inclusionary zoning and to set any fees that in lieu of constructing housing units. Figure 5 shows an example of the type of analysis needed from Murphy and Rehm 2013 based on the Auckland Unitary Plan.

FIGURE 5 ASSESSMENT OF IMPACTS WILL REQUIRE WORKING THROUGH A DEVELOPMENT MODEL

Financial Viability of Hypothetical Developments under Steady Market Conditions

Zone	Storeys	None	5%	10%	15%	20%	25%	30%	35%	40%
20% Margin										
Metro	18	Not Viable								
Mixed	4			Viable						
Terrace	4					Viable				
	5					Viable				
	6	Not Viable								
25% Margin										
Metro	18	Not Viable								
Mixed	4	Not Viable								
Terrace	4			Viable						
	5				Viable					
	6	Not Viable								
30% Margin										
Metro	18	Not Viable								
Mixed	4	Not Viable								
Terrace	4	Viable								
	5		Viable							
	6	Not Viable								

Murphy and Rehm 2013 suggest the initial decision-making hurdle for developers is calculated as profit on costs and that a key indicator of feasibility was that 20 per cent of development costs" was required.

This real-estate valuation analysis followed by Murphy and Rehm 2013 need to be applied to the Wellington City context to unlock the number of affordable housing dwellings that are likely to be produced under the new regulations, and the likely impacts on supply.

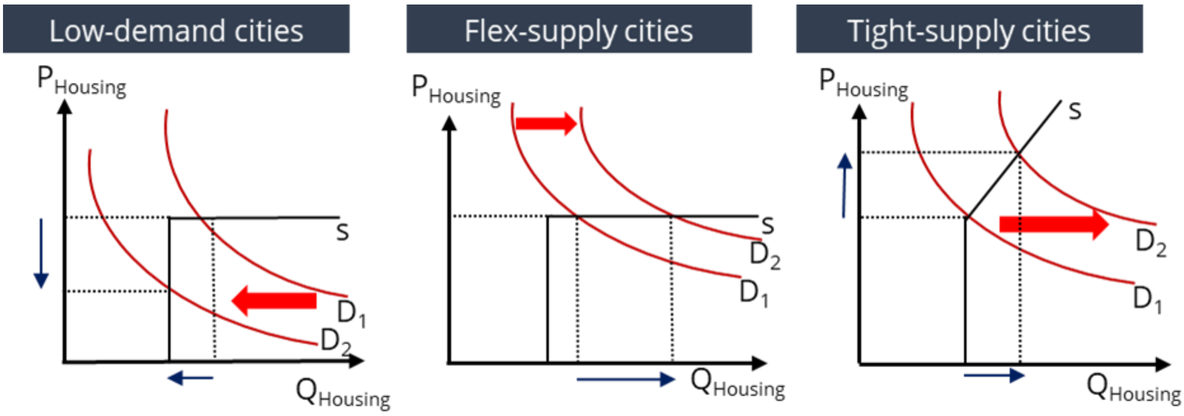
4. Assessment

Need tight logic framework for inclusionary housing

Housing is complex and inclusionary zoning is particularly complex. There are many moving parts and many actors, each with their own motivations and idiosyncratic behaviours. A clear intervention logic is needed to identify who the policy is designed to support, how it should operate and what is needed for success.

Plans and rules need to be flexible. Right now, housing supply is tight in New Zealand's metropolitan areas. New Zealand's major cities are characterised by tight supply rather than flexible supply cities (see Figure 6).

FIGURE 6 SUPPLY IS TIGHT AND UNRESPONSIVE IN NEW ZEALAND'S METROPOLITAN AREAS



That supply is tight and not particularly flexible, sets up just one precondition for inclusion zoning to play a role. Wellington City Council should also consider how inclusionary zoning operates across the business cycle. Expect supply of new dwellings to take time to recover from recessions if inclusionary units are required in addition to market supplied units. Council should also be mindful of property rights and have a clear understanding of developer profits relative to risk and the underlying cost of inputs, including land.

Inclusionary zoning is also likely to provide better outcomes when councils work together on inclusionary zoning policies. Developers may vote with their feet and choose to develop in parts of the broader Wellington region housing market not covered by any inclusionary zoning policy.

Being clear on who is intended to benefit from inclusionary zoning will also help monitor outcomes to test if inclusionary zoning promotes the desired outcomes. Shamubeel Eaqub notes:

> "Inclusionary zoning is a necessary tool only when housing supply has been unresponsive for some time. It should not be required in every administrative region, nor a permanent feature. Because inclusionary zoning should be self-limiting, triggered on the back of a formal housing needs assessment, against on objective set of metrics agreed by the local community or national standards."

Local conditions will also matter. One lesson from the international literature is that the development process differs from community to community so policies may need to provide different cost offsets in different locations. Much of the US literature also uses inclusionary zoning as an antidote to exclusionary zoning that prices minorities out of richer, predominantly white suburbs. Any policy needs to make clear if diversity is an explicit target for inclusionary zoning.

Set modest expectations

Inclusionary zoning works on a small fraction of new construction (5-10 percent) that is in turn a small fraction (1-2 percent) of the existing housing stock. Expecting to affordable housing to have large impacts on the price of market housing is unrealistic and misleading.

Inclusionary zoning risks the unintended consequence of constructing fewer housing units depending on the response of developers. The most vulnerable, including Wellington's homeless, sit outside inclusionary zoning.

Redistribution policy is best left to central government. Instead, aim for using inclusionary zoning to improve housing outcomes for a small number of residents.

Given the finding of the international literature, expect small to modest impacts on housing and rents in the general housing market from implementing an inclusionary zoning scheme.

Costs for first home buyers – outside of the dwellings offered under the inclusionary zoning scheme – are unlikely to fall materially. Any change in the proportion of households renting compared to owning their own home is likely to come from the direct impact of the scheme. This is likely to be small. Council will also have options on who takes up the affordable dwellings.

Work alongside rather than replace other initiatives

There could be other policies that are likely to help provide more affordable housing. For example, taxing land rather than capital could be expected to increase intensity of use of land for housing within the city centre. Many inclusionary zoning policies also trade-off provision of allowances for more density (relaxing height restrictions and floor-to-area ratios) to provide inclusionary housing. Relaxing these policies that restrict density may provide the additional fillip to increase housing supply that is needed. The Furman Center notes:

> "...communities should think of IZ as one piece of a broader and more comprehensive housing strategy rather than as a stand-alone policy response."

One key finding of the international literature on inclusionary zoning is that jurisdictions that adopt inclusionary zoning are more likely to have neighbouring jurisdictions that have inclusionary zoning regulations. Coordinating policy across jurisdictions is likely to be critical in determining the spatial location of new housing supply.

After completing a full CBA to test the viability of implementing an inclusionary zoning scheme, council needs to decide whether a voluntary scheme is preferable to a mandatory scheme. Key decisions of mandatory schemes include whether in-lieu fees are accepted and if so, right-sizing the quantum of these fees. The size of these fees will be determined by the extent of ambition from local government to engage on equity and the impacts on housing supply that could be identified by testing viability through a CBA scheme.

Lessons from the international literature suggest starting small and using pilot studies to guide tailoring of local conditions to incentivise outcomes.

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