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Planning and Affordable Housing in Australia and the UK: A Comparative Perspective

NICOLE GURRAN* & CHRISTINE WHITEHEAD**

*Faculty of Architecture, Design and Planning, University of Sydney, Australia, **London School of Economics and CCHPR, University of Cambridge, UK

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ABSTRACT *Land use planning systems in Australia and the United Kingdom (UK) share a common history. In both nations, one objective of town planning has been to improve housing conditions for the urban poor and facilitate sufficient housing supply for growing post-war populations, with UK legislation serving as a model for Australia, at least until the Town and Country Planning Act 1947. Since this time however, approaches have diverged. In the UK, housing assistance and the land use planning system have co-evolved, with planning an important tool for securing affordable housing, particularly in England. In contrast, a deep cleavage between urban planning and housing policy persists in Australia. Drawing on a series of studies undertaken separately by the authors over the past decade which concentrate on Australia and England, the paper compares urban and housing policy in both nations, and examines planning system performance in securing new affordable homes.*

KEY WORDS: Planning, planning gain, affordable housing, inclusionary zoning

Introduction

The question of whether urban planning is the problem or the solution with regard to affordable housing has gained momentum. Initially, an important objective of post-war planning legislation was to ensure an adequate supply of housing land for all types of household. However, in the new millennium, there has been a widening chasm between housing demand and supply in nations such as the UK and Australia. This has often been blamed on the land use planning system, but at the same time has prompted new thinking about how planning can contribute to affordable housing production. To examine this issue the paper compares the ways in which the planning systems in the two nations have addressed affordable housing, flowing from the traditional role of planning in ensuring housing standards and providing sufficient land to accommodate current and projected

Correspondence Address: Nicole Gurrán, Faculty of Architecture, Design and Planning, University of Sydney, NSW 2006, Australia. Email: nicole.gurran@sydney.edu.au

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population needs, regardless of tenure, to an increasing perception that specific planning instruments are needed to achieve affordable housing.

Despite cultural similarities and shared legal traditions, planning approaches in Australia and the UK have progressed along different trajectories. On the one hand, the constituent countries of the UK have maintained an emphasis on using the planning system to address social and distributional objectives, such as the need for affordable homes.¹ By contrast, Australian planning law has limited the extent to which social goals, including affordable housing, can be pursued through the planning process, with some recent exceptions. This paper seeks to understand these differences and the implications for affordable housing supply as a basis for identifying opportunities to strengthen approaches in both nations, and for contributing to the growing body of international literature on planning for affordable housing inclusion (Calavita & Mallach, 2010; Chiu, 2007; Norris, 2006; Meltzer & Schuetz, 2010; Schuetz *et al.*, 2009).

The paper addresses three main questions: (1) how have relationships between housing provision, affordability and urban planning systems evolved in Australia and the UK? (2) how has the planning system been used to generate dedicated affordable housing, and to what effect? and, (3) how could these models be improved in the context of a wider planning and housing policy imperative to deliver more housing supply overall? It builds on and expands two primary studies of planning and affordable housing provision in Australia and England undertaken separately by the authors (Gurran *et al.*, 2008; Whitehead, 2007) using a comparative research approach. Comparative housing research can offer new insights about housing systems and potential impacts of particular policy interventions to common problems (Kemeny & Lowe, 1998), provided that differences in governance structures and policy orientation, as well as socio-cultural and economic factors are taken into account (Quilgars *et al.*, 2009). Explicit identification of such contextual factors enables 'conceptual equivalence' and more meaningful comparison (Milligan, 2003). The paper establishes 'conceptual equivalence' through a systematic comparison of demographic, housing market and policy trends, as well as systems for urban regulation and governance. In particular, it distinguishes between the market efficiency orientation of Australia's planning system and the more distributional approach to allocating land and providing affordable housing in the UK.

The paper is structured as follows. First, there is a review literature on urban regulation and housing, including the principles that lie behind planning for affordable housing inclusion. Second, the paper examines the extent of the problems of supply and affordability in the two countries before profiling urban policy and housing characteristics. Finally, it compares how specific planning approaches for affordable housing inclusion are developing in England and Australia.

Urban Regulation, Housing Supply and Affordability

Questions about the impact of planning on housing outcomes are not particularly new. There is a lengthy body of theoretical and empirical research examining connections between land use planning regimes, land and housing prices and rates of house building over time, much of which has originated from the United States (US) (e.g. Dowall, 1981; Gyourko *et al.*, 2008; Glaeser & Ward, 2009; Ihlanfeldt, 2009; Mayer & Somerville, 2000) and the UK (Barker, 2003, 2004; Bramley, 2007; Cheshire, 2008; Gallent *et al.*, 1998; White & Allmendinger, 2003; Whitehead, 2007). This work generally positions urban

planning as a form of intervention in the private market, with the goal of more efficient, equitable and socially beneficial patterns of development. Intervention occurs through the articulation of strategic spatial policy (often expressed through land use plans); mechanisms for land and infrastructure co-ordination and procurement (often obligations on developers to contribute to the costs of infrastructure provision); and codified processes for managing urban change (building regulations and permit requirements). Such intervention inherently constrains private decisions and generates higher prices where the constraint bites, especially if values are increased by higher quality urban outcomes, stimulating even greater demand (Monk & Whitehead, 1999). More generally, less land will be available for activities that generate negative externalities, resulting in higher market prices, while more land will be available for other uses including those which generate social benefit. However, these external benefits cannot be realised without additional intervention because, by assumption, they offer inadequate market return.

In this context there are important distinctions to be made between more efficiency oriented market systems (such as the USA and indeed Australia) and more distributional oriented administrative allocation mechanisms (such as the UK) in terms of financing the government intervention necessary to ensure adequate housing for lower-income households. Administratively based systems which tend to be oriented towards distributional issues put the emphasis on ensuring an adequate quantity of land and affordable housing. To obtain that supply involves both additional land allocations and supply side subsidies as, by assumption, the market will not see such provision as profitable. This is very consistent with the traditional UK modes of planning and affordable housing. In the efficient market model there will be land price differentials arising from regulations imposed to control negative externalities (for example, to constrain sprawl), and from regulations designed to generate positive enhancement (for example, aesthetic controls or permission to achieve higher density). Such gains can, at least in principle, be harnessed through land taxation or through development charges to pay for affordable housing. In the distribution based system there are no such inherent gains if the planning system is simply providing land additionally to what the market requires to support those unable to afford market prices. Additional funding has therefore to be provided.

Under both models there are strong pressures to over-constrain the provision of housing land in order to preserve the interests of existing owners. There are also physical constraints associated with achieving new supply in high demand (generally already built up) locations. In these cases there is additional economic rent associated with all housing land and it is possible to tax that economic rent either directly or through planning requirements including the provision of affordable housing.

In practice all systems are mixed with some element of efficiency pricing, some element of direct distributional provisions and arguably some element of over-constraint. As a result there is almost always evidence of two distinct affordability issues—higher prices and price income ratios, across the whole income spectrum and the need for additional assistance (either income or supply based) for those unable to afford adequate accommodation. The stronger the land constraint the more the need to help poorer households; equally the more uneven the income distribution the greater the need for intervention (Crook & Whitehead, 2002; Galster, 1997; Monk & Whitehead, 1999; Whitehead & Monk, 2006; Whitehead & Yates, 1998). The objective in this paper is to locate Australia and the UK along those spectra to understand better how planning instruments have been developed to address these issues.

The distinction between increasing house prices and worsening affordability across the market overall and the specific provision of affordable housing for those unable to afford adequate accommodation is of particular importance in understanding the role of planning. 'Housing affordability' and 'affordable housing' are contested concepts in the academic literature, as in policy and practice, and different jurisdictions measure 'affordability', and govern access to 'affordable' housing, in different ways (Hulchanski, 1995; Nepal *et al.*, 2010; Stone, 2006). Stone distinguishes between conceptual or theoretical studies of housing affordability (which focus on definitional approaches); measures used as a basis for housing assistance programme design or eligibility; and wider indicators of the extent of housing need across the population. Much of the debate centres on the merits of the standard income to housing payment ratio to define housing affordability, versus the 'residual', or after housing payment approach (Kutty, 2005). While arguing that the residual approach provides a more conceptually sound basis for measuring housing need, Stone points to operational difficulties (such as defining a normative standard for non-housing costs) that have limited its application in the context of the UK (Stone, 2006). Related measures include the wider concept of 'housing consumption' which incorporates housing payments over time as well as government subsidisation, returns (such as rising prices) and might also extend to costs associated with housing location (transport expenses), design (energy and water efficiency, maintenance), or management (apartment strata fees) (Haffner & Heylen, 2011).

Headline indicators of housing affordability in both the UK and Australia tend to focus on income and housing cost ratios, although more nuanced policy measures of housing need are sensitive to income distribution. In Australia, the term 'housing stress' has been a specific focus for government intervention, defined with reference to those on the first two income quartiles (the bottom 40 per cent) whose housing costs more than 30 per cent of their income (Beer *et al.*, 2007). The incidence of housing stress differs across space, with pressures typically concentrated in high demand metropolitan contexts, where low cost accommodation is particularly scarce. However, in Australia high amenity coastal areas, and regional and remote locations affected by the resources boom, have also experienced severe housing shortages (Costello, 2009; Lawrie *et al.*, 2011). Similarly, in the UK, rural gentrification, combined with reluctance to support new housing development beyond existing urban centres, has generated affordability pressures for low-income groups (Gallent, 2009).

While sometimes used interchangeably with 'housing affordability', the more specific term 'affordable housing' is used by policy makers in the UK and Australia at least to refer to a diversity of housing tenures, ranging from traditional social housing through to shared equity and subsidised homeownership, provided for those on low or moderate incomes and offered at sub-market rents or prices (Whitehead, 2007). In this way, the term 'affordable housing' is intended to reflect a semantic shift from stigmatised 'public' housing towards a wider spectrum of delivery models and target groups. Finally, it is important to recognise that, in both countries, industry sectors refer to 'housing affordability' and 'affordable housing' in much looser ways. In this colloquial sense, 'affordability' means the scale of effective demand for new dwelling supply, and 'affordable housing' means stock at the lower end of the market.

Planning regulations, development controls and fees are all instruments that can be used to support the provision of affordable housing units, or to prevent them. In the US, restrictive planning controls have been shown to exclude lower-income groups or

particular household types from certain areas by mandating more expensive, lower density housing typologies (Ihlanfeldt, 2004; Schuetz, 2009). Reaction to such 'exclusionary' controls inspired the first 'inclusionary' zoning planning approaches, requiring that a proportion of developments above a certain threshold be set aside for affordable housing. Such 'inclusionary' housing schemes in the context of English and Australian approaches are discussed later in the paper. However, it is important to note here that measures to offset 'exclusionary' planning impacts through requirements for affordable housing do not necessarily overcome wider planning system barriers to low cost and diverse housing forms or systematic inefficiencies where these exist (Department of Housing & Urban Development, 2005).

Mandatory fees or charges (called 'impact fees' or 'exactions' in the US; 'planning obligations' or more specific terms such as 'community infrastructure levies' in the UK, and 'development contributions' in Australia), have attracted much research and policy debate (Been, 2005; Burge & Ihlanfeldt, 2006; Mathur *et al.*, 2004). Developer contributions are often justified by the impact that new development makes on the need for public infrastructure and may be levied for any purpose, including affordable housing, provided that a 'nexus' or link is shown between the contribution and the actual impact of the development (Been, 2005; Campbell *et al.*, 2000). In the UK, where the nationalisation of development rights and the resultant over-constraint usually ensures that significant value accrues from planning approval, development contributions, allowed under Section 106 (S106) of the Town and Country Planning Act 1990, include affordable housing and are further justified as a way of sharing this unearned 'windfall' for public benefit (Crook & Whitehead, 2002; Crook *et al.*, 2010).

While in theory any planning obligations, including fees and charges, should be passed back to the landowner and thus reduce land prices, observed relationships are somewhat different, depending on the market context (Been, 2005). Research in the US suggests that development contributions can be associated with higher house prices in more affluent areas without reducing construction rates (suggesting that infrastructure benefits are capitalised in house prices) (Burge *et al.*, 2007). In less affluent areas they have been associated with neutral price impacts but increased housing production (Burge & Ihlanfeldt, 2006; Mathur *et al.*, 2004). Evaluations of the impact of S106 in England suggest that some part of the costs are borne by developers and by social landlords, but these costs are not reflected in house prices. Rather, the obligation influences the mix of dwellings included in the development (Monk *et al.*, 2005).

In summary, planning tools for affordable housing inclusion may be characterised as a type of development contribution, justified both by the value uplift from planning decisions and the impact of particular developments on the need for affordable housing. More generally, they can be rationalised as one response to the price effects and housing impacts of development and a means of facilitating additional types of housing output. However, they must be designed with care to ensure they do not represent another planning constraint, given overall concern over planning system disincentives to new housing supply (Barker, 2008; NHSC, 2010).

Housing and Urban Policy in the UK and Australia: Contextual Factors

There are obvious historical, cultural and legal connections between the UK and Australia. The earliest urban regulations were imported to Australia from Britain and 'aimed to

prevent construction of tenements by separating houses and permitting the circulation of fresh air' (Marsden, 2000, p. 27). The new settlers were eager to realise housing aspirations unattainable in their homeland, and so resisted such rules, buying plots and building houses without restriction beyond the central cities where cheaper designs and materials prevailed. This set the scene for a buoyant housing market supported by a strong private building industry, and a long cultural obsession with homeownership. By contrast, although the pattern in the UK was similar during the rapid expansion of the interwar period, after 1945 there was far greater emphasis both on planning constraints and on public and later social housing provision supported through planning allocations and subsidy.

Today, the two nations share many similarities. In particular actual household growth rates have been strong, exceeding projections in both countries, due largely to longevity and international migration (Table 1).

New dwelling completions have lagged behind this household growth. In England, completions have varied from 130 000 to 170 000 per annum, although net additions have been somewhat higher (Table 2). This compares to estimates by the National Housing Planning and Advice Unit (NHPAU), which suggested a range of between 240 000–270 000 dwellings per annum would be necessary if affordability were not to worsen in the longer term (National Housing & Planning Advice Unit, 2009).

Table 1. Selected characteristics, UK and Australia

Country	Population (millions) 2008	Annual growth 2001–2008	Household size (2008)	Annual h'hold growth projected 2006–2031	Price/income ratios (first-time buyers) 2002 2008	
UK	61.4	0.6%	2.4		3.23	4.45
England	51.5	0.7%		252,000		
Australia	21.8	1.5%	2.6	161,000	3.71	5.47

Note: Australian first-time buyers' indicator uses median household income for the 25–34 year age cohort, and capital city median house prices.

Sources: ABS (2009), Tables 7 & 8; ABS (2010), Tables 10, 13A; Department of Communities and Local Government (2010), Live Table 517).

Table 2. Housing output and prices in England

	Completions 000s	Net additions 000s	Affordable housing, 000s	Social rent 000s	First-time buyer prices £000
2000–01	133	132	35	6	90.8
2001–02	130	131	33	6	110.1
2002–03	138	144	33	9	118.8
2003–04	144	155	33	15	138.1
2004–05	156	169	38	16	150.7
2005–06	163	186	37	22	149.3
2006–07	168	199	45	20	163.2
2007–08	169	207	53	24	155.2
2008–09	134	167	56	25	141.6

Sources: Department of Communities and Local Government (2010), Live Tables 209, 118, 1000.

In Australia, output has matched average growth in households in only one year this century (Table 3). Based on a household growth rate of 160 000 per annum, medium supply growth forecasts suggest that the overall cumulative dwelling supply gap has grown to 178 400 dwellings in 2009 and is projected to reach 640 600 by 2029 (NHSC, 2010, p. 73).

Focusing on indicators of housing need, in particular the availability of affordable housing for those on low incomes, significant pressure is evident. In Australia, home affordability for first-home buyers has declined in the decade to 2008 (NHSC, 2010) because of increasing deposit gaps and repayments associated with price rises. The indicative price income ratio for average households has shifted nearly two points from 3.71 in 2002 to 5.47 in 2008, using capital city price data (Table 1) (ABS, 2009, 2010). Pressure in the long-term private rental sector has been exacerbated by the decline in social housing stock from around 400 000 dwellings in 1996 to 391 000 in 2006 (NHSC, 2010, p. 184). While there was an estimated 1 410 000 private rental dwellings affordable to those on the bottom 40 per cent of income distribution in Australia in 2007–08, the vast majority (over 1 million) of these were occupied by higher-income households, leaving a shortfall of 493 000 affordable rental dwellings (NHSC, 2010, p. 94).

In the UK the numbers of first-time buyers with a mortgage have declined throughout the century from 568 000 in 2001 to under 200 000 in 2008, at the same time as interest payments to incomes rose from 13.4 per cent to 19.6 per cent (CML, 2010); price income ratios increased to nearly five times income (Table 2) and prices themselves rose by over 80 per cent (Table 3). In 2007/08, some 50 per cent of those in the private rented sector were paying 30 per cent of their incomes on housing, as were nearly 48 per cent of those buying with a mortgage (Expenditure and Food Survey, 2007–08).

Table 3. Dwelling completions and house prices, Australia, 2002–2009

Year	Dwelling completions Australia ^a	Capital city median house prices \$AU
2002	131,900	193,350
2003	152,800	242,500
2004	156,900	282,500
2005	160,600	310,500
2006	154,700	350,375
2007	148,200	390,000
2008	143,500	421,250
2009	146,400	444,500

Note: ^a Gross completions not adjusted for demolitions.

Source: ABS (2010), Tables 7 & 8; NHSC (2010). Based on unweighted sales of established houses.

Table 4. Rents and costs as a proportion of lower quartile earnings, England

	2002/03	2007/08
Housing association	0.30	0.31
Local authority	0.23	0.24
Private	0.49	0.49
Owner-occupier costs	0.49	0.96

Source: Banks et al. (2009).

In the UK, as in Australia, a series of government commissioned studies have examined problems of housing supply and affordability (Barker, 2004; Parliament of Australia, 2008; Productivity Commission, 2004). These studies have catalysed a wave of planning reforms geared towards reducing planning system barriers to the land and housing supply pipeline in both nations. However, outcomes so far have been limited and, at least in the UK, are now subject both to more radical change in the regulatory framework and the adverse effects of recession. Given this contemporary housing supply and planning reform agenda, it is relevant to turn to the ways in which planning systems in both nations have evolved to deliver specific affordable housing opportunities for those on low and moderate incomes.

Planning for Affordable Housing Inclusion: The UK

Success in planning for affordable housing arises from the specifics of the planning system unique to the UK, particularly the separation of development rights and land ownership. The government owns development rights to land regardless of that land's ownership by private citizens, and recent legislation has allowed for the mandate of affordable housing provision as a prerequisite for residential planning permission. Furthermore, in England the term 'development' is not limited to a definition of physical construction or physical change, but refers to any change in use.

The cornerstone of this policy came from the UK Town and Country Planning Act 1947. Consistent with the more general policy of government ownership of the commanding heights of the economy, the Act nationalised development rights, giving power to central and local government to control all change of use. The housing objective was to ensure adequate land and infrastructure for all households whether or not they had the capacity to pay. In this context while the planning legislation was tenure neutral, the housing finance system gave local authorities freedom to build public housing as they wished subject only to per unit cost limits. As a result, in the main, the local authority under its planning role, gave itself planning permission to build on its own land (Whitehead, 2003).

By the mid-1970s local authorities were starting to reduce their involvement in new provision, in part as a result of modifications in the subsidy system (Department of the Environment, 1977). However, fundamental change did not occur until the 1980s when the Thatcher Government restricted both the local authorities' capacity to borrow for housing purposes and their right to subsidise housing provision from local property taxes. The new-build programme was shifted to the Housing Association (non-profit) sector. These organisations were expected to fund development from private sector borrowing together with capital grants. Most importantly, they had to purchase land on the open market.

As the importance of land costs increased, the potential for the planning system to secure opportunities for affordable housing inclusion in new development gained traction in the UK in the early 1980s in some localities. At the national level, an initiative in 1989 allowed rural planning authorities exceptionally to grant planning permission for low-cost homes on sites which would not otherwise be developed. From this beginning, policy instruments for securing new affordable housing through the planning system emerged (Crook & Whitehead, 2000).

The approach to policy development was codified in the Town and Country Planning Act 1990 and the Planning and Compensation Act 1991. As a result the land use planning system could be used both to segment the market to ensure that land for affordable housing would be

made available and owners and developers made a contribution to its costs. In particular, S106 of the 1990 Act enabled local planning authorities that could show the need for affordable housing at development plan stage, to require that a proportion of housing to be affordable on a site by site basis. The vast majority of the contributions required were expected to be in the form of on-site provision of affordable housing, although there was the capacity for providing sites elsewhere or making a financial contribution where this was thought more appropriate. Section 106 also codified powers for authorities to ask for contributions towards transport, education and other social infrastructure (Barlow *et al.*, 1994; Campbell *et al.*, 2000; Crook, 1998; Crook *et al.*, 2002).

In 1998, Government Circular 6/98 reinforced the legislative requirement by determining that inadequate provision of affordable housing on the part of the developer was acceptable grounds for rejecting a developer's proposal. The affordable housing requirement was thus finally fully embedded in general planning legislation. Since then, additional policies have been put in place notably with respect to ensuring mixed communities on new developments and emphasising on-site contributions, enabling affordable housing on mixed use on what are basically commercial sites have also been put in place (Department of the Environment Transport & the Regions, 1997, 1998; Department of Transport Local Government & the Regions, 2000; Office of the Deputy Prime Minister, 2001a, 2001b, 2001c, 2001d). The new coalition government has maintained the position of affordable housing within a much constrained S106 approach. This aims to restrict the use of S106 style powers to contributions specific to site specific remediation (as before 1990) but retains the power to require affordable housing (Department of Communities & Local Government, 2011a). In addition there is an enhanced New Homes Bonus for each additional affordable home provided (Department of Communities & Local Government, 2011b). The role that affordable housing plays within the UK system is thus if anything enhanced.

In sum, every development in the UK must obtain planning permission, and it is possible for local authorities to accept or deny applications taking into account the commitment to affordable housing provision. This means that value uplift occurs when permission is issued. This contrasts with countries with different planning systems, such as the US, where development entitlement is implied by zoning or other regulatory mandates, thus shifting value uplift to the time of land designation, and weakening the case for securing an affordable housing (or other) contribution.

Outputs and Outcomes

Over time, these planning tools have become well established and widely used across the UK, and particularly England (Crook *et al.*, 2002; Crook *et al.*, 2010). Local plans typically include general provisions for seeking affordable housing contributions, subject to thresholds for development size as well as target percentages for identified sites. Some difficulties have surrounded the use of S106 in rural areas, where sites may not offer sufficient size or development value to support an affordable housing requirement, or local officials fear that affordable housing requirements might depress development opportunities or provide for undesirable newcomers (Gallent, 1997). In these areas, the 'rural exceptions policy' to permit affordable housing beyond the existing urban footprint has been used more widely, despite concerns about possible speculation, and potential conflicts with the overriding goal of sprawl prevention (Gallent, 1997). Targets for affordable housing inclusion in new housing have ranged from between 15 per cent and 20

per cent of new supply (typically in the North and West of England) on the one hand to up to 50 per cent in high growth areas of the South East, including London on the other (Whitehead, 2007).

While actual output is typically less than these targets, until the financial crisis there was a steady increase in the total contributions being achieved through planning obligations and the proportion of affordable housing being achieved through the planning system (see Figure 1, Table 2 and Crook *et al.*, 2010). There was an even stronger growth in permissions for affordable housing developments over this time (Crook *et al.*, 2010). In the latest assessment of the value of negotiated contributions was still increasing rapidly and over 50 per cent of identified contributions were related to affordable housing. Another important means of achieving higher output levels has been the very significant shift towards low-cost homeownership, which requires little direct subsidy as compared to social rented housing (Figure 2). As a result social rented housing only achieved the levels observed at the turn of the century in 2007–08 (Figure 3); the big increases have been in intermediate housing, mainly low-cost homeownership (Monk & Whitehead, 2010).

Part of the appeal of the S106 approach, for both local authorities and developers, has been its flexibility for both parties. Most local authorities follow general guidelines but have few, if any, absolutes. This allows for a case-by-case assessment on the particular needs of a site and takes a myriad of other factors into account as well. The other side of this flexibility elicits claims of unfairness on the part of the local authorities, who are generally less knowledgeable and experienced than developers when it comes to aggressive negotiations over construction costs, land values and appropriate compensation to the communities. At the same time, developers argue strongly that the uncertainties generate costs and reduce the overall level of housebuilding. Over the last few years this view has increasingly come to be

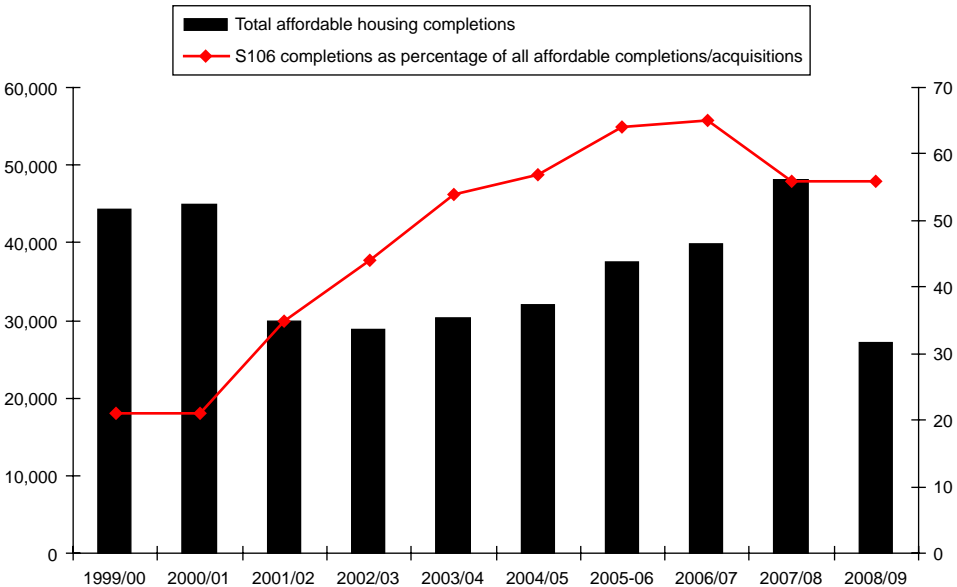


Figure 1. S106 completions as a percentage of all affordable completions / acquisitions. *Source:* Housing Strategy Statistical Appendix (various years).

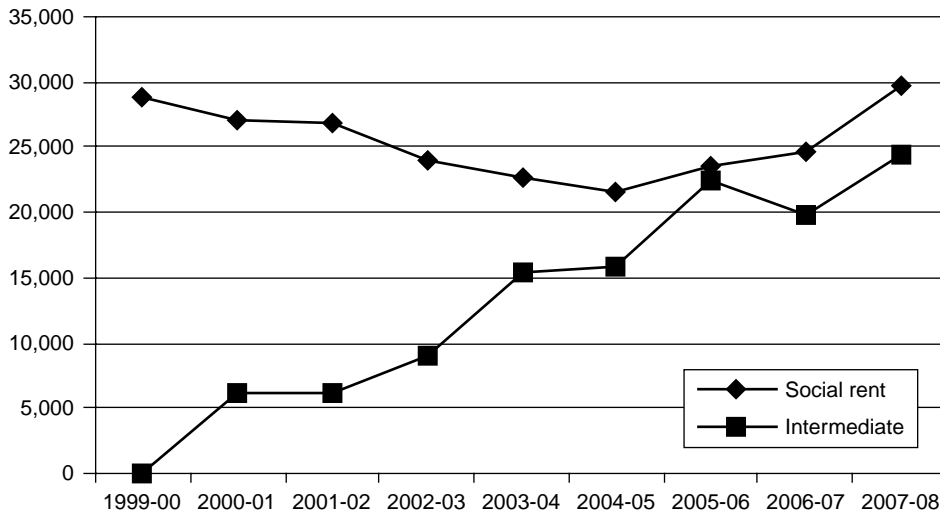


Figure 2. Social rented and intermediate housing 1999–2008. *Source:* Department of Communities and Local Government (2010), Live Table 1000.

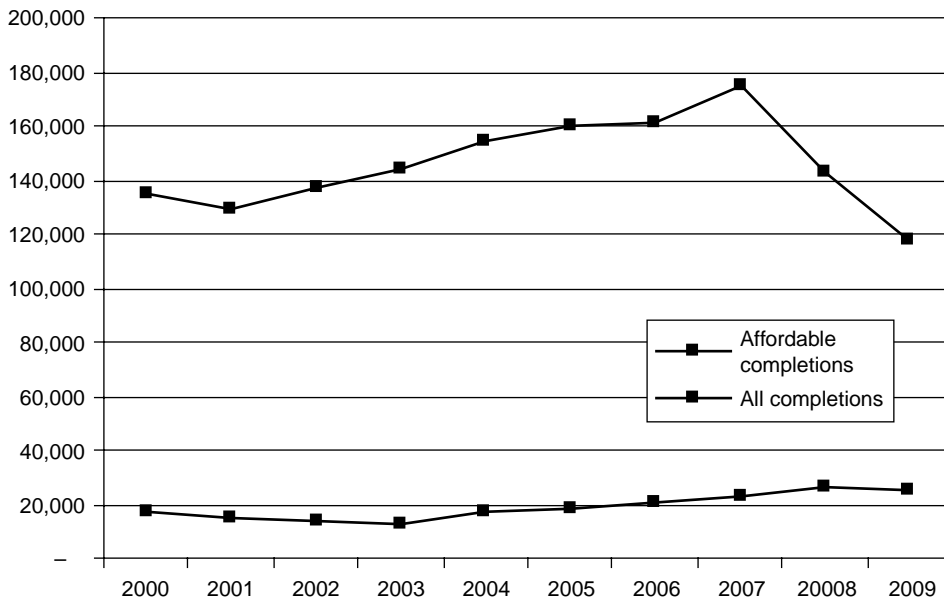


Figure 3. Affordable completions and all completions 2000–2009. *Source:* Department of Communities and Local Government (2010), Live Table 209.

accepted by government, which has looked to move towards a more tariff based approach to securing development contributions (Burgess *et al.*, 2010).

One benefit of the policy compared to traditional methods of affordable housing provision has been that S106 normally requires the affordable housing to be incorporated

into market sites, thereby creating a mix of incomes and tenures within a single location rather than isolating affordable housing developments into less desirable areas without physical proximity to more mainstream provision (Crook *et al.*, 2010). Off-site provision might allow a greater number of affordable units to be built, albeit in the same mono-tenure fashion as they were historically produced. This illustrates the conflict between maximising the amount of affordable housing to be built, particularly in the face of a housing crisis, and the goal of long-term sustainability for those new homes through the mixed communities agenda. Of particular importance in this context are the views of local voters (Crook *et al.*, 2006). The fact that the new affordable homes may enable the sons and daughters of local households to stay in the area helps to make the development more acceptable and therefore may increase the total level of output (Monk *et al.*, 2005; Whitehead, 2007).

The most obvious constraint on this type of approach lies in the extent to which affordable housing provision is tied to market housing output levels. In principle land allocation is not related to financial viability; rather, the local authority should ensure land for all housing required to meet identified needs. However, to the extent that affordable housing is an outcome of market activity this will only occur if adequate subsidy—through social housing grants and S106 is enough to maintain viability (Monk *et al.*, 2005). In the recession conditions now pertaining there is little or no capacity to expand provision except through the traditional means of public subsidy to support building on publicly owned land. This was the short-term response of the Labour Government (Homes & Communities Agency, 2011a). The new political environment under the coalition is changing the nature of the incentives and constraints facing local authorities (Burgess *et al.*, 2010). In particular, national and regional housing targets have been removed, giving local authorities greater freedom to determine their own plans. At the same time, tax benefits are being made available to incentivise development, particularly of affordable homes (Department of Communities & Local Government, 2011b). It is far too early to assess how this will play out, but the UK Government's 2011 Comprehensive Spending Review suggests that these incentives, together with increasing local authority borrowing powers, can generate perhaps 150 000 new affordable homes during the next four years (Homes & Communities Agency, 2011b). Within these allocations the role of S106 has to a significant extent been superseded by the increased borrowing capacity from the new affordable rents regime available to housing associations and other affordable developers. Thus for the moment the core role of S106 is to ensure land is made available. Only when land values rise again will potential for it to generate significant costs subsidy reemerge.

Overall, this system has given the UK Government particularly strong powers, both in terms of property rights and of regulatory instruments. These powers include the government ownership of development rights; the power for local government to reject any specific proposal; and, the flexibility to negotiate on a site-by-site basis for contributions around an indicative, rather than prescriptive, development plan. Further, national law provides that affordable housing is a material consideration and therefore is implicitly treated as part of the rational nexus between proposals and the assessment of their impact. National planning policies on sustainability, housing density and achieving mixed communities specify guidance to local planning authorities which provides legal backing to support on-site affordable housing agreements. Even though the new government has very different views about the relative role of central and local decision

making, the general principles determined in the 1947 Act and the special position of affordable housing as a material consideration defined in the 1990 Act remain in place and are likely to do so far into the future.

Protecting, Promoting and Providing Affordable Housing in Australia

The Australian story is somewhat complicated by its three-tiered system of government—emanating from the Commonwealth (national level) tier, to the States / Territories and local governments. The Commonwealth funds the States and Territories to provide housing assistance for low and middle-income households under what is now the National Affordable Housing Agreement (COAG, 2009). The States and Territories have responsibility for urban policy and planning, and each has their own idiosyncratic planning legislation and approaches to development control. As administrative units beholden to State/Territorial legislation, local governments (administrative staff and an elected governing ‘council’) have very limited functions overall, largely restricted to preparing local plans, development control, co-ordinating utilities and some community services. In comparison to other parts of the world, Australian local councils lack the financial resources and policy mandate to undertake development at any significant scale. As a result, unlike in the UK where the post-war housing shortage was addressed through public development, ownership and management—with local authorities as planners and delivery agents—in Australia the private sector has remained the main initiator of housing and urban development. Another important distinction between the UK and Australia is the structure of the residential development industry itself, which typically separates functions of land development and private house building.

Early 20th century Australian planning legislation drew heavily on UK planning law, particularly the Town and Country Planning Act 1932 (Whitehouse, 1985). There was strong reliance on a land use zoning system by which particular uses or developments might be ‘permitted absolutely, permitted with consent, or totally prohibited’ (Fogg, 1985, p. 261). While the UK shifted away from land use zoning in 1947, introducing the discretionary system and nationalised development rights, no such fundamental shift followed in Australia (Dawkins, 1985). Subsequent iterations of Australian planning legislation have introduced discretionary criteria for assessing the social, economic and environmental impacts of development. However, new laws have tended to overlay, rather than overturn, existing planning schemes and implied development entitlements fixed by zoning.

This underlying zoning system of assumed development rights affects the supply of land which may legally be used for a particular purpose, thus ‘settling floating (land) values long before development’ (Fogg, 1985, p. 262). This has had two important consequences in terms of planning for affordable housing in Australia. First, the ability to negotiate for a community outcome, such as affordable housing provision, is eroded in advance by establishing development potential ahead of specific planning proposals. Second, when public authorities wish to acquire land (not already set aside or ‘zoned’ for public purposes) they must do so at a market rate which reflects these opportunities. So, although Commonwealth funding for public housing development under the first Commonwealth State Housing Agreement (CSHA) in 1945 was made contingent on the states enacting new town and country planning legislation and undertaking slum clearance, the planning

system was never really integrated with housing assistance (Gleeson & Low, 2000). Rather, housing, particularly for low and middle-income earners, was seen as the domain of the Commonwealth, through its funding role under the CSHA, while special purpose State housing commissions developed and managed public housing, often sidestepping local councils and planning requirements. Public housing itself soon became a marginal and highly targeted form of housing tenure in Australia, shrinking from approximately 18 per cent of total housing stock in 1981 (Jones *et al.*, 2007) to less than 5 per cent in 2009 (NHSC, 2010), as a consequence of a Right to Buy scheme during the 1970s and 1980s and subsequent reduced real expenditure on new public housing development.

Therefore, while in the UK, and particularly in England, housing was recognised nationally as a material planning consideration underpinning plan making and the assessment of proposals, in Australia, attempts to address housing need through the planning system evolved through a series of piecemeal, local initiatives. One of the first was led by the City of Port Phillip (now St Kilda) in inner Melbourne, Victoria, which in 1985 established its own community housing company, and over time has sought to support its affordable housing programme through the planning process, with mixed success (Gurran, 2003; Milligan *et al.*, 2009). In the early 1990s the Commonwealth (Labour) Government funded several urban renewal demonstration projects under its Building Better Cities (BBC) Programme. One of these was a pilot inclusionary zoning scheme in the Sydney inner-city renewal precinct of Pyrmont/Ultimo, known as 'City West' (Gurran *et al.*, 2008; Williams, 2000). Later that decade several local councils in NSW initiated modest planning schemes to secure small contributions for affordable housing (Table 6), although most have since expired or been curtailed by changing state legislation. In 2001 the Brisbane City Council formed its own affordable housing provider, the Brisbane Housing Company (in partnership with the Queensland Department of Housing) and established a short-lived compulsory development contribution scheme. In 2004 a change in the composition of the elected Council resulted in its abandonment and the refund of around \$10 million to developers, although the affordable housing company itself continued to grow (Milligan *et al.*, 2009).

The ambivalence towards planning for affordable housing began to change in the middle of this decade as part of a wider policy shift towards a diversified system of housing assistance and deliberations around a new generation funding agreement to replace the CSHA (Milligan *et al.*, 2009). Several jurisdictions began to pursue a range of approaches to affordable housing inclusion, under the wider umbrella of negotiations for the new National Affordable Housing Agreement (NAHA), which commenced in January 2009 (COAG, 2009). In 2006, landmark amendments to South Australia's Development Act 1993 enabled local plans to include provisions for affordable housing. This operationalised a State affordable housing target, announced in 2005, for achieving 15 per cent affordable housing in new development areas. The planning provisions were initially applied to the redevelopment of government sites but have increasingly been included when major new residential areas are released or rezoned to allow higher density development. Approximately 400 new affordable home purchase units were realised in South Australia under this mechanism in 2008 alone (FAC, 2009). In Queensland, the special purpose Urban Land Development Authority (ULDA) was established in 2007 with an explicit affordable housing supply and affordability agenda. The authority has set a target of 15 per cent affordable housing inclusion within its urban renewal redevelopment sites in Brisbane, to be

achieved through a combination of inclusionary planning requirements and incentives as well as surplus funds generated through the redevelopment process (Urban Land Development Authority, 2009).

In NSW, the State Government introduced State Environmental Planning Policy (SEPP) (Affordable Rental Housing) in 2009, incorporating a number of existing provisions for retaining or providing low cost or special needs housing. New opportunities for affordable housing development were also introduced, including a floor-space density bonus for projects incorporating affordable rental housing. Another provision to enable affordable housing on well located surplus industrial sites where housing would not otherwise be permitted, is similar in operation to the English 'rural exceptions' mechanism. While premature to evaluate outputs, of the scope of the instrument was curtailed in May 2011, narrowing the potential locations in which affordable housing may be developed. Other developments in NSW planning policy may also undermine the value of this instrument. For example, local governments across the Sydney region have been rezoning to achieve State Government targets for higher residential density in existing areas and new suburbs in Greenfield growth locations (Metropolitan Development Program, 2009). There have been no specific affordable housing requirements associated with this rezoning process, but if potential capacity for increased density has been accurately defined, the density 'bonus' will be a superfluous tool.

Outputs and Outcomes

Australia's record of planning mechanisms for affordable housing is a series of pilot schemes, small-scale bespoke projects, and some false starts, falling into four main categories: mechanisms to retain and offset the loss of existing low-cost housing (used in the State of NSW since the 1990s); mechanisms to overcome local planning barriers to diverse housing (also used in NSW since the 1990s); planning bonuses or incentives for voluntary affordable housing contributions (in some jurisdictions of NSW since the mid-1990s, and in South Australia since 2006); and mandatory requirements for affordable housing inclusion (in isolated inner-city jurisdictions of NSW and in new residential areas in South Australia) (Table 5).

Evidence of the output of these initiatives is limited, as data on affordable housing schemes are not yet systematically or centrally collected. A recent audit identified 15 programmes between 1985–2008, consisting of a combination of negotiated agreements on private and government owned land, inclusionary requirements and density bonus schemes. As shown in Table 6, most of the schemes have been on redevelopment sites, with only the South Australian approach including a greenfield (previously undeveloped) land component. Further, the majority of approaches have involved government subsidy in the form of land or other resources.

In summary, the Australian case demonstrates how the potential for planning to generate affordable housing was undermined by the shift towards giving developers the right to invest in line with implied land use entitlements, codified in statutory zoning schemes or plans. The result has been a diversity of planning approaches for affordable housing, emerging from an historical dichotomy between national housing policy and assistance and State / local urban planning and regulation of private sector development. Approaches have been ad hoc and tentative, in part because of the entrenched strength of the private housing development industry and implicit (although not necessarily enshrined

Table 5. Approaches to planning for affordable housing in Australia

Approach	Examples	Jurisdictions
Retaining / offsetting loss of low-cost housing forms	NSW state planning policy to address the loss of low-cost rental flats and boarding houses by requiring special assessment processes of certain development / strata title proposals & mitigation arrangements to address impact on tenants / availability of low-cost housing, if project approved. Social impact requirements triggered in some NSW local plans when caravan parks threatened with redevelopment. Goals for boarding house retention in some Victorian / QLD planning schemes.	NSW, Victoria, Queensland (QLD)
Mechanisms to overcome local planning barriers to diverse housing forms	NSW State environmental planning policy to make seniors housing, group homes, manufactured homes, boarding houses, permissible in appropriate locations despite prevailing local controls.	NSW
Planning bonuses / incentives for affordable housing inclusion / contributions for affordable housing development	South Australian provision to apply planning concessions for affordable housing development (subject to design criteria).	South Australia (SA), QLD, NSW
Mandatory requirements for affordable housing inclusion	Graduated planning standards may be applied to certain low-cost housing (QLD). NSW state planning policy to provide density bonus for projects incorporating affordable housing component. SA & NT have declared targets of 15% affordable housing in new development areas (but limited mechanism to acquire for social housing / non profit sector). Small inclusionary zoning requirement in certain declared urban renewal precincts of inner Sydney (1.5–3% of development value).	SA, Northern Territory (NT), NSW

Sources: Gurran *et al.* (2008); Milligan *et al.* (2009).

in legislation) property development entitlements flowing from the increasingly codified planning systems operating across the States and Territories.

Further, in comparison to the UK examples, Australian planning approaches for affordable housing have clearly failed to achieve significant scale with the largest two schemes yielding 556 (2000–2008) and 560 dwellings (1985–2008) respectively (Gurran *et al.*, 2008) (Table 6), although there is potential for the South Australian model to gain momentum. A primary limitation has been that local initiatives for affordable housing have not been supported by higher levels of government. Equally, government investment and incentives for housing and housing assistance—such as funds for social housing development, and new incentives for affordable housing investment—have generally not worked with the planning system to improve outcomes. The restricted nature of the Australian mechanisms mean that for the most part dwellings have not been able to be

Table 6. Planning scheme affordable housing outputs, Australia 1985–2009

Case Study	Mechanism	Development context	Time-frame	Govt. land/subsidy	Outputs
CUB (City of Sydney)	Mandatory negotiated agreement	Redevelopment/renewal	2007–	×	\$23 million
Canada Bay, NSW	Voluntary negotiated agreement	Redevelopment	2005–07	×	15 units (1 development)
Randwick, NSW	Mandatory contribution	Redevelopment	2004–07	×	15 units, (in 3 developments)
Gosford, NSW	Control to preserve low cost housing	Redevelopment	2004–07	×	Retention of caravan parks
Byron, NSW	Voluntary agreement	Redevelopment	2005–	×	No outcomes to date
Waverley, NSW	Incentive (density bonus)	Infill; development	1999–	×	33 units: 17 owned by Council and 16 leased to Council for periods from 3–15 years).
City West & Green Square (City of Sydney), NSW	Inclusionary zoning	Redevelopment	1995–	✓	491 units acquired, 56 at planning stage
Willoughby, NSW	Mandatory contributions	Development	1999	×	10 units (from 1 development)
Ropes Crossing (ADI)	Mandatory negotiated agreement	Development	2004–	✓	150 housing lots (equivalent) in 5000 dwelling development
St Mary's, NSW	Planning incentives for affordable housing, statutory covenant	Development	2007	×	75 bedrooms
Ferry Apartments (Brisbane City Council), QLD					
St Balfours (Adelaide City Council), SA	Mandatory negotiated agreement	Redevelopment	2003–2007	✓	52 affordable housing units, 39 to be purchased by state, 13 owned by council
Glenside Hospital (City of Burnside), SA	Mandatory inclusion (15%)	Redevelopment	2006–	✓	60 units (15% of total dwellings; inc 5% for high needs)
Cheltenham Racecourse City of Charles Sturt, SA	Mandatory inclusion (15%)	Redevelopment	2007–	×	15% (of total dwellings or equivalent)
South Australia new residential areas (multiple LGAs)	Mandatory inclusion (15%)	Greenfield/renewal	2008/09	×	400 units
City of Port Phillip (Victoria)	Negotiated agreements	Redevelopment	1985–	✓	560 dwellings (approx)

Source: derived from Gurran *et al.* (2008).

secured onsite, limiting opportunities for mixed developments and making it difficult for affordable housing developers to compete on the open market for land.

Conclusions

This paper has compared the evolution of UK and Australian housing and urban policy regulation particularly since the defining post-war Act of 1947 in the UK and the implementation of the first Commonwealth State Housing Agreement (1945) in Australia. Both nations began the last century with broadly similar legislative frameworks for urban and housing development, but vastly different philosophies towards housing provision. These differences of approach were sharpest during times of greatest pressure—the need to eradicate the urban slums of the early 20th century; the urgent rush to deliver housing in the post-war population booms. The UK Government after 1945 responded directly through housing planned and provided by local authorities, while in Australia, housing provision remained largely a private sector activity. In the UK, the provision and regulation of housing has remained entwined with central government policy and local delivery, and later, urban regulation, meaning that a strong history of social rental housing provision (preceding and following the emergence of urban policy and development regulation) has more or less persisted. By contrast, the early white Australian settlers had a deep attachment to the concept of homeownership, and a resistance to regulation, supporting the establishment of a strong private house building sector. This gained in strength in the post-war boom years, and by and large delivered sufficient quantities of new housing supply until the early years of the new millennium. In comparison to the UK, Australia's tradition of private sector housing provision (supplemented by modest Commonwealth Government provided public housing) and ambivalence towards urban regulation, helps to explain why planning mechanisms for affordable housing never really gained traction. Further, the underlying land use zoning approach has limited scope for planning authorities to secure additional community benefits (such as affordable housing) through the development assessment process. Nevertheless, as both nations now face similar housing supply and affordability challenges, there are opportunities to learn from the failures and successes of the past as well as the increasing use of legally based affordable housing requirements in countries with a zoning tradition (Austin *et al.*, 2010).

In strengthening planning approaches for affordable housing, three primary themes emerge from this dual country comparison. First, the importance of synchronising housing and urban policy to support affordable housing considerations when land is allocated and projects assessed, including the need for central and local government policies to align, enabling local authorities to undertake proactive roles in securing affordable housing in their communities. This implies both legislative support through the planning system, and financial support through policy connectivity as demonstrated by the ways in which the UK planning system has worked with financial contributions such as the social housing grant.

Second, in both nations intermediate housing models appear to be gaining prominence in part because they are locally more acceptable than social rented housing, and in part because they can be supported more readily by planning regulation and mixed communities policies. This trend requires little upfront government subsidy but may yield substantial gains, consistent with an overall housing supply agenda by enabling demand at the lower end of the homeownership market to be satisfied. In the UK the mechanisms do not inherently generate additional homes because affordable housing is a proportion of the

proposed scheme, which is one reason why there has been so much concern about the role of S106 in delaying or even restricting development. Even so, connecting planning requirements to other investment or incentives for affordable housing development has undoubtedly helped lift falling rates of housing construction (Homes & Communities Agency, 2011a). In Australia, more recent interest in using the planning system to support affordable housing coincides with a growing emphasis on the nascent affordable housing development sector, which in some jurisdictions, is beginning to achieve scale (Milligan *et al.*, 2009). However, use of the planning system will need to become far more systematic and widespread before any significant impact on the supply of affordable housing is achieved. This requires legislative change to overcome the legal constraints currently preventing the imposition of affordable housing requirements during the planning process. Such changes are likely to be resisted by the development industry and viewed with suspicion by government, in the context of wider concerns about barriers to housing supply. This is despite the potential for planning levers to align with government investment in affordable housing to maintain housing output in the context of market decline, as demonstrated by the UK experience.

Third is the importance of political will. In the UK there has been continued acceptance that large numbers of additional affordable homes are required, although much dispute about how these should be financed, owned and allocated. In Australia that will is less embedded especially in policy, leading to far greater emphasis on private solutions. The history of the use of the planning system as a means of both providing land and finance for affordable housing in the two countries reflects these very different opportunities and constraints. As both nations face new housing supply challenges in the context of stimulus funding withdrawal and economic uncertainty, political commitment to addressing the housing needs of those lower down the income scale will be more important than ever.

Note

- ¹ While the basic planning framework is UK-wide, there are considerable differences between how policy has been implemented in the four constituent countries, especially from 1990. This paper therefore concentrates on experience in England.

References

- ABS (2009) *Catalogue 65230, Household Income and Income Distribution, Australia 2007–08* (Canberra: ABS).
- ABS (2010) *Catalogue 6416, House Price Indexes, Eight Capital Cities, September 2010* (Canberra: ABS).
- Austin, P., Gurran, N. & Whitehead, C. 2010 Planning and affordable housing: diverse approaches from a common starting point? The Experience of Australia, New Zealand and the UK, *Cambridge Conference on Planning and Housing*, September 2010.
- Banks, D., Whitehead, C. & Spenceley, J. 2009. *Cross Tenure Rents and Affordability, 2007/08 Update*. (Cambridge: Dataspring, CCHPR, University of Cambridge).
- Barker, K. (2003) *Review of Housing Supply: Securing Our Future Needs—Interim Report—Analysis* (London: ODPM).
- Barker, K. (2004) *Review of Housing Supply—Delivering Stability: Securing Our Future Housing Needs, Final Report* (London: ODPM).
- Barker, K. (2008) Planning policy, planning practice, and housing supply, *Oxford Review of Economic Policy*, 24(1), pp. 34–49.
- Barlow, J., Cocks, R. & Parker, M. (1994) *Planning for Affordable Housing* (London: HMSO), Department of the Environment.
- Been, V. (2005) Impact fees and housing affordability, *Cityscape*, 8(1), pp. 139–185.
- Beer, A., Kearins, B. & Pieters, H. (2007) Housing affordability and planning in Australia: the challenge of policy under neo-liberalism, *Housing Studies*, 22(1), pp. 11–24.

- Bramley, G. (2007) The sudden rediscovery of housing supply as a key policy challenge, *Housing Studies*, 22(2), pp. 221–241.
- Burge, G. & Ihlanfeldt, K. R. (2006) Impact fees and housing affordability, *Journal of Urban Economics*, 60(2006), pp. 284–306.
- Burge, G. S., Nelson, A. C. & Matthews, J. (2007) Effects of proportionate-share impact fees, *Housing Policy Debate*, 18(4), pp. 679–710.
- Burgess, G., Monk, S. & Whitehead, C. (2010) *How Can the Planning System Deliver More Housing?* (York: Joseph Rowntree Foundation).
- Calavita, N. & Mallach, A. (Eds) (2010) *Inclusionary Housing in International Perspective: Affordable Housing, Social Inclusion, and Land Value Recapture* (Washington: Lincoln Institute).
- Campbell, H. J., Ellis, H., Henneberry, J. & Gladwell, C. (2000) Planning obligations, planning practice, and land use outcomes, *Environment and Planning B—Planning & Design*, 27(5), pp. 759–775.
- Cheshire, P. (2008) Reflections on the nature and policy implications of planning restrictions on housing supply. Discussion of ‘Planning policy, planning practice, and housing supply’ by Kate Barker, *Oxford Review of Economic Policy*, 24(1), pp. 50–58.
- Chiu, R. L. H. (2007) Planning, land and affordable housing in Hong Kong, *Housing Studies*, 22(1), pp. 63–81.
- CML (2010) Affordability and first-time buyers, *Housing Finance*, 1(2010), pp. 1–9.
- COAG (2009) *National Affordable Housing Agreement* (Canberra: Council of Australian Governments).
- Costello, L. (2009) Urban-rural migration: housing availability and affordability, *Australian Geographer*, 40(2), pp. 219–233.
- Crook, A. D. H. & Whitehead, C. (Eds) (2000) *The Achievement of Affordable Housing Policies through the Planning System. Restructuring Housing Systems: From Social to Affordable Housing?* (York: York Publishing Services).
- Crook, A. D. H. & Whitehead, C. M. E. (2002) Social housing and planning gain: is this an appropriate way of providing affordable housing? *Environment and Planning A*, 34(7), pp. 1259–1279.
- Crook, A., Burgess, G., Dunning, R., Ferarri, E., Henneberry, J., Lyall Grant, F., Monk, S., Rowley, S., Watkins, C. & Whitehead, C. (2010) *The Incidence, Value and Delivery of Planning Obligations in England in 2007–08* (London: DCLG).
- Crook, A., Monk, S., Rowley, S. & Whitehead, C. (2006) Planning gain and the supply of new affordable housing in England, *Town Planning Review*, 77(3), pp. 353–373.
- Crook, T. (1998) Financial austerity, affordable housing and the planning system: betterment tax and hypothecation, *Town Planning Review*, 69(4), pp. ii–vii.
- Crook, T., Currie, J., Jackson, A., Monk, S., Rowley, S., Smith, K. & Whitehead, C. (2002) *Planning Gain and Affordable Housing: Making it Count* (York: Joseph Rowntree Foundation).
- Dawkins, J. (1985) The role of discretion in the history of development control. Paper presented at the Conference on Town Planning Law, Perth.
- Department of Communities and Local Government (2011a) *New Homes Bonus: Final Scheme Design* (London: DCLG).
- Department of Communities and Local Government (2011b) *Draft National Planning Policy Framework* (London: DCLG).
- Department of the Environment (1977) *Housing Policy: A Consultation Document, Cmnd 6851* (London: Department of Environment).
- Department of the Environment Transport and the Regions (1997) *Planning and Affordable Housing Circular 1/97* (London: Stationery Office).
- Department of the Environment Transport and the Regions (1998) *Planning and Affordable Housing Circular 6/98* (London: Stationery Office).
- Department of Housing and Urban Development (2005) *Why Not in Our Community? Removing Barriers to Affordable Housing, An Update to the Report of the Advisory Commission on Regulatory Barriers to Affordable Housing* (Washington: Department of Housing and Urban Development).
- Department of Transport Local Government and the Regions (2000) *Planning Policy Guidance Note 3: Housing* (London: Stationery Office).
- Dowall, D. E. (1981) Reducing the cost effects of local land use controls, *Journal of the American Planning Association*, 47(2), pp. 145–153.
- FAC (2009) *Department for Families and Communities Annual Report 2008–09* (Adelaide: Government of South Australia).
- Fogg, A. (1985) Patterns in the Use of Development Control in Australia, Conference on Town Planning Law, Perth.

- Gallent, N. (1997) Planning for affordable rural housing in England and Wales, *Housing Studies*, 12(1), pp. 127–137.
- Gallent, N. (2009) Affordable housing in 'village England': towards a more systematic approach, *Planning Practice & Research*, 24(2), pp. 263–283.
- Gallent, N., Baker, M. & Wong, C. (1998) Securing housing choice: new opportunities for the UK planning system, *Housing Studies*, 13(3), pp. 425–438.
- Galster, G. (1997) Comparing demand-side and supply-side housing policies: sub-market and spatial perspectives, *Housing Studies*, 12(4), pp. 561–578.
- Glaeser, E. L. & Ward, B. A. (2009) The causes and consequences of land use regulation: evidence from Greater Boston, *Journal of Urban Economics*, 65(3), pp. 265–278.
- Gleeson, B. & Low, N. (2000) *Australian Urban Planning: New Challenges, New Agendas* (Melbourne: Allen and Unwin).
- Gurran, N. (2003) Housing locally: positioning Australian local government housing for a new century, *Urban Policy and Research*, 21(4), pp. 393–412.
- Gurran, N., Milligan, V., Baker, D., Bugg, L. & Christensen, S. (2008) New Directions in Planning for Affordable Housing: Australian and International Evidence and Implications AHURI Final Report Series (12) (AHURI), Melbourne.
- Gyourko, J., Saiz, A. & Summers, A. (2008) A new measure of the local regulatory environment for housing markets: the Wharton residential land use regulatory index, *Urban Studies*, 45(3), pp. 693–729.
- Haffner, M. & Heylen, K. (2011) User costs and housing expenses. Towards a more comprehensive approach to affordability, *Housing Studies*, 26(4), pp. 593–614.
- Homes and Communities Agency (2011a) *National Affordable Housing Programme* (London: HCA).
- Homes and Communities Agency (2011b) *Affordable Homes Programme* (London: HCA).
- Hulchanski, J. D. (1995) The concept of housing affordability—six contemporary uses of the housing expenditure-to-income ratio, *Housing Studies*, 10(4), pp. 471–491.
- Ihlanfeldt, K. R. (2004) Exclusionary land-use regulations within suburban communities: a review of the evidence and policy prescriptions, *Urban Studies*, 41(2), pp. 261–283.
- Ihlanfeldt, K. R. (2009) Does comprehensive land-use planning improve cities? *Land Economics*, 85(1), pp. 74–86.
- Jones, A., Phillips, R. & Milligan, V. (2007) *Integration and Social Housing in Australia: Challenges and Options*. Australian Housing and Urban Research Institute (AHURI) Positioning Paper Series (102) (AHURI), Melbourne.
- Kemeny, J. & Lowe, S. (1998) Schools of comparative housing research: from convergence to divergence, *Housing Studies*, 13(2), pp. 161–176.
- Kutty, N. K. (2005) A new measure of housing affordability: estimates and analytical results, *Housing Policy Debate*, 16(1), pp. 113–142.
- Lawrie, M., Tonts, P. & Plummer, P. (2011) Boomtowns, resource dependence and socio-economic well-being, *Australian Geographer*, 42(2), pp. 139–164.
- Marsden, S. (2000) The introduction of order, in: P. Troy (Ed.) *A History of European Housing in Australia* (Cambridge: Cambridge University Press).
- Mathur, S., Waddel, P. & Blanco, H. (2004) The effect of impact fees on the price of new single family housing, *Urban Studies*, 41(7), pp. 1303–1312.
- Mayer, C. J. & Somerville, C. T. (2000) Land use regulation and new construction, *Regional Science and Urban Economics*, 30(6), pp. 639–662.
- Meltzer, R. & Schuetz, J. (2010) What drives the diffusion of inclusionary zoning? *Journal of Policy Analysis and Management*, 29(3), pp. 578–602.
- Metropolitan Development Program (2009) *MDP 2008/09 Report; Residential Forecasts 2008/09–2017/18* (Sydney: Department of Planning).
- Milligan, V. (2003) How different? Comparing housing policies and housing affordability consequences for low income households in Australia and the Netherlands, *Netherlands Geographical Studies*, 318, Koninklijk Nederlands Aardrijkskundig Genootschap, Universiteit Utrecht, Utrecht.
- Milligan, V., Gurran, N., Lawson, J., Phibbs, P. & Phillips, R. (2009) Innovation in affordable housing in Australia: bringing policy and practice for not-for profit housing organisations together, AHURI Final Report Series 134 (AHURI), Melbourne.
- Monk, S. & Whitehead, C. (2010) *Affordable Housing and Intermediate Housing Tenures* (Oxford: Blackwell).
- Monk, S. & Whitehead, C. M. E. (1999) Evaluating the economic impact of planning controls in the United Kingdom: some implications for housing, *Land Economics*, 75(1), pp. 74–93.

- Monk, S., Crook, T., Lister, D., Rowley, S., Short, C. & Whitehead, C. (2005) *Land and Finance for Affordable Housing: The Complementary Roles of Social Housing Grant and the Provision of Affordable Housing through the Planning System* (York: Joseph Rowntree Foundation).
- National Housing and Planning Advice Unit (2009) *More Homes for More People: Advice to Ministers on Housing Levels to be considered in Regional Plans* (London: NHPAU).
- Nepal, B., Tanton, R. & Harding, A. (2010) Measuring housing stress: how much do definitions matter? *Urban Policy and Research*, 28(2), pp. 211–224.
- NHSC (2010) *Second State of Supply Report* (Canberra: Department of Families, Community Services and Indigenous Affairs).
- Norris, M. (2006) Developing, designing and managing mixed tenure estates: implementing planning gain legislation in the Republic of Ireland, *European Planning Studies*, 14(2), pp. 199–218.
- Office of the Deputy Prime Minister (2001a) *Planning Green Paper—Delivering a Fundamental Change* (London: Office of the Deputy Prime Minister).
- Office of the Deputy Prime Minister (2001b) *Sustainable Communities—Building for the Future* (London: Office of the Deputy Prime Minister).
- Office of the Deputy Prime Minister (2001c) *Planning for Size, Type and Affordability—A Consultation Paper* (London: Office of the Deputy Prime Minister).
- Office of the Deputy Prime Minister (2001d) *Planning for Mixed Communities—A Consultation Paper* (London: Office of the Deputy Prime Minister).
- Parliament of Australia (2008) *A Good House is Hard to Find: Housing Affordability in Australia* (Canberra: Commonwealth of Australia).
- Productivity Commission (2004) *First Home Ownership, Report No. 28* (Melbourne: Productivity Commission).
- Quilgars, D., Elsinga, M., Jones, A., Toussaint, J., Ruonavaara, H. & Naumanen, P. (2009) Inside qualitative, cross-national research: making methods transparent in a EU housing study, *International Journal of Social Research Methodology*, 12(1), pp. 19–31.
- Schuetz, J. (2009) No renters in my suburban backyard: land use regulation and rental housing, *Journal of Policy Analysis and Management*, 28(2), pp. 296–320.
- Schuetz, J., Meltzer, R. & Been, V. (2009) 31 flavors of inclusionary zoning comparing policies from San Francisco, Washington, DC, and suburban Boston, *Journal of the American Planning Association*, 75(4), pp. 441–456.
- Stone, M. E. (2006) A housing affordability standard for the UK, *Housing Studies*, 21(4), pp. 453–476.
- Urban Land Development Authority (2009) *Affordable Housing Strategy* (Brisbane: Urban Land Development Authority).
- White, M. & Allmendinger, P. (2003) Land-use planning and the housing market: a comparative review of the UK and the USA, *Urban Studies*, 40(5–6), pp. 953–972.
- Whitehead, C. (2003) Restructuring social housing systems in housing and social change: East-West perspectives, in: R. Forrest & J. Lee (Eds) *Housing and Social Change: East-West Perspectives* (Oxford: Routledge).
- Whitehead, C. M. E. (2007) Planning policies and affordable housing: England as a successful case study? *Housing Studies*, 22(1), pp. 25–44.
- Whitehead, C. & Monk, S. (2006) *Does Spatial Planning Increase Value and Welfare? Principles and Evidence* (London: RTPi).
- Whitehead, C. & Yates, J. (1998) In defence of greater agnosticism: a response to Galster's comparing demand-side and supply-side housing policies, *Housing Studies*, 13(3), pp. 415–423.
- Whitehouse, J. (1985) Discretion in Environmental Planning: New South Wales Experiments, Conference on Town Planning Law, Perth.
- Williams, P. (2000) Inclusionary zoning and affordable housing in Sydney (Routledge) 18, pp. 291–310.