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# Chapter Five

## Learning from Contrasts and Commonalities in Housing Policy Narratives: Australia, Canada and the UK

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## Making Comparisons, Shaping Questions

Academics, more so than international organisations such as the OECD and the IMF, have long expressed caution about the limits to international comparative research in housing (Harloe, 1985; Kemeny and Lowe, 1998; Boelhuwer et al, 1999). The practicalities of overcoming differences in the substance and meaning of apparently similar data for making contrasts are well known. Equally, it is now well understood that apparently obvious ideas, such as home-ownership rates or homelessness, can vary considerably in their meaning and measurements across different national systems (and may even vary within countries, for instance different Scottish and English definitions of homelessness). Even where an important issue can be consistently defined and measured, for example, the tax subsidy to support rental housing, comparative conclusions may have to be qualified by differences that a particular tax plays within a national tax system. There is much to be said for approaches in international collaborations that see other contexts as helping one country to better frame questions to answer within its own national-regional policy system. It is much less likely that policy innovations cannot be plucked from one nation and simply transplanted elsewhere with any expectation of effectiveness.

It is obvious that local contexts and local systems matter in understanding housing policies. However, that does not render international comparisons and knowledge exchange as interesting but unproductive tasks. Aside from the virtue of understanding different contexts helping to shape better questions about local systems there are also national and international, even global dimensions to both housing market processes and policy developments. The national 'policy' stories highlight that there have been important commonalities in some of the broad approaches to policy across the ABC countries.

These commonalities can arise in at least four different ways. First, the social and economic processes of change that shape housing demand and supply systems may be correlated across countries. For instance, innovations in transportation, population ageing, and global warming have all induced new policy challenges for housing at much the same time in Canada, Australia and the UK.

The second consideration is that as globalisation has grown, not least since the start of the 1980s, there are closer, direct connections across countries in capital flows, FDI, skilled and unskilled labour and the share of trade in GDP has broadly increased. In consequence, single countries are more open to not only the opportunities for growth but to the adverse cyclical changes and sudden shocks originating in the wider world economy.

These global impacts on local housing systems may have minor effects in some localities but, as discussed below, they are of increasing significance in the major metropolitan areas of all the ABC countries

The third 'global' dimension to housing policy discussions arises because there are international communities of researchers, consultants and practitioners that transfer policy innovation propositions across national boundaries. Governments are also involved in these processes and, although internet access to policy experiences across the world is growing (and exceptionally informative for Australia and the UK, less so for Canada), there has been now a decade of downward pressure on the travel and analytical capacities of national governments on 'international comparative' work. The OECD has raised its commitment to understanding housing issues, but it is not one of the areas in which it leads international debate. The IMF has had a narrow, if important, focus of interest in macroeconomic stability of national housing markets that has been theoretically driven rather than empirically informed.

The fourth and final driver of 'common experiences' has been the widespread shift, across the OECD countries, in the major settings in economic, monetary and fiscal policies. Housing systems and outcomes are usually significantly impacted by macroeconomic and economic policy beliefs and measures, indeed possibly more so than by the detailed housing sector instruments that preoccupy housing specialists. Views about how to control inflation, the efficacy of quantitative easing, the nature of monetary policy, the virtues and limitations of deregulation, the efficacy of public ownership, borrowing and debt, the role of fiscal policy in growth and the role of the state and sub-national governments all changed after the 1970s (ending Piketty's 'short twentieth century'). They have, arguably, had profound effects upon the functioning and outcomes of housing systems.

The Shaping Futures project, by connecting leading practitioners and academics, in a prolonged discussion based on co-produced papers, allowed those involved to understand differences in meanings and data and to take a broad view of what drove similarities and differences in housing policy choices and whether instruments or ideas had some potential for transferability. The remainder of this brief chapter sets out some of the main commonalities across the ABC countries. The next section looks at the major policy settings that countries shared and some general housing policy consequences and the next section addresses specific housing policy changes before a short conclusion.

## Shaping Futures, Abandoning ‘Wisdoms’

### Key Beliefs Changing

By the first decade of this millennium the conventional wisdom framing housing policy decisions in ministries at national/federal levels in the ABC countries included five fundamentally important judgements about framings for policy that applied not just to housing but to the broad approach to policy. It is important to note that the specific measures to implement these approaches differed across countries as did the extent to which they displaced other policy approaches. Whilst it can be readily agreed that the ABC countries all embraced the ‘neoliberal’ shift in economic policy framing this still left considerable scope for policy differences. Protestant Christianity in Britain embraces the very different cultures and consequences of High Anglicanism in Westminster Cathedral, thoughtful Quakers in York and the austere unaccompanied psalms of the Free Church of Scotland in Stornoway. We need to get beneath the label of ‘neoliberalism’ and understand the middle-ground between state and market (Miao and Maclennan, 2016) to avoid anything but lazy comparisons of different national policy approaches.

Reflections across the three countries make it clear that four fundamental changes in the new ‘meta framework’ of quasi-principles for policymaking emerging at the end of the 1970s had fundamental implications for housing policies. These were *‘smaller state’*, *‘reducing public debt’*, *‘localisation-devolution, decentralisation and subsidiarity’* and *‘a presumption of the efficacy of market provision’*.

The ‘smaller state’ narrative argued that public, or state action, was generally to be reduced or minimised wherever possible, and this approach applied both in the UK with its historically large welfare state and in the more market-oriented economies of Australia and Canada. The ‘smaller-public-sector’ belief pervaded decisions about planning and housing provider roles, for instance in the ABC countries post-1980 support for provision of new public housing and the use of compulsory purchase in planning and land policies sharply reduced.

The ‘reduced public debt’ mantra reflected the new conventional wisdom that public borrowing and public debt were to be avoided wherever possible, irrespective of the investment/consumption nature of the associated expenditure (and this wisdom has persisted through the last decade of record low, and negative real, interest rates).

The ‘localisation’ argument was often based on the logic that devolution facilitated better local choices that would also be more effectively provided. However, ‘devolution’ often morphed into ‘dumping’ (Maclennan and O’Sullivan, 2013) where the downloading of housing roles from higher to lower-order governments were not matched by effective re-assignment of controls over resources and taxes. This raised, in all three countries, the vertical fiscal imbalance between national/federal and more local entities as the task of addressing housing problems remained resolutely local but the elastic tax base to deal with them usually remained in national/federal hands. This became a particularly serious issue, after the mid-1990s in faster growing metropolitan areas with rising needs, no coherent metropolitan structures of government and limited local resources and it is evident in all three national narratives. This raises a further common change across the ABC countries in question, namely there is a significant possibility that the major cities, more linked to global flows of trade, labour, and capital may have become progressively ‘de-linked’ from other cities and rural regions, and this adds complexity to framing national level policy initiatives. Different places may have different tales to tell.

The framing assumption that ‘free-functioning markets were effective’, and by implication that needed to be as fully deregulated as possible to work well had major implications not just in reducing state investment but in setting the dominant mindset for policy-making. This meant that housing markets were to be regarded as essentially free of inherent market failures. This view has, in recent decades, been challenged in the UK Treasury, but it has dominated economic thinking for housing-policymaking at Federal and sub-national levels, especially in Canada (where few official publications cite evidence from outside of north America or the conventional neoclassical framework for economic analysis, see for instance CMHC (2018)). Below we argue that it is important to distinguish between housing policy strategies that see markets as the main or core system for allocation and investment but that may require some policy action to address market failures, and those who hold strictly to a well-functioning/leave it to the market policy approach.

Two further, housing-specific framings have also had major effects on housing policy expenditures. The further framing assumption in policy-making processes was that *housing policy expenditures were merely 'merit good' investments* driven by re-distributional aims and of some use for *macro-stabilisation policies* in periods of economic downturn: there was a common explicit view that housing had no (or no evidenced) productivity effects or growth effects on the economy so that housing policy spending was usually regarded as displacement. The final policy framing, greatly emphasised after the Global Financial Crisis of 2008, was the *potential financial instability* effects of 'riskier' mortgage lending. Naturally nations do not wish to promote unduly risky borrowings but there needs to be clarity that excessively safe lending rules are not distorting housing choices and asset accumulation for the future. Both the UK and Australian governments have recently begun to reflect upon how the affordability problem also means a productivity challenge but there was an absence of any real justification of where the safe margins of debt and lending lay.

### **The General Housing Policy Consequences**

Programme reductions in housing quickly followed these changed beliefs. There have been periods of recovery in housing budgets either for cyclical stabilisation reasons, as in all three countries between 2009-12, or where there was some period of recognition that housing difficulties were mounting, in for example the Blair and Rudd governments, in the UK and Australia respectively. In general, however, Housing Ministries saw their share of public investment allocations fall. Housing Ministers, became downgraded in significance, for instance in England (until 2016 when the 'Housing' portfolio was added to lead the appellation of the Secretary for State for Housing, Communities and Local Government); or eliminated entirely, as in Australia's federal government post-2013.

These spending outcomes weakened the evidence and economics capacities of housing advocates within government to make and hear housing policy cases. Higher orders of government have been better at concealing these deficiencies but at sub-national scales, housing portfolios have been subsumed within Family and Social Affairs departments and increasingly focussed upon homelessness measures and the very poorest households (Dalton et al 2017; Pawson et al 2018). Analytical resources have been stripped away from housing. Usually, investment resources have shrunk. Ministries that were home to the crumbling foundations of old housing policies were rarely invited or resourced to make economic cases for housing investment and housing was seen to have no identifiable role in economic growth and productivity processes.

## **Changing Housing: Specific Issues**

### **Growing Problems, Secularly Unfolding Crises**

The three country narratives revealed that at metropolitan and national/federal levels the ABC countries display an emerging trio of housing difficulties. Homelessness, struggling social housing sectors as official housing 'needs estimates' are rising, and an increasingly system widespread difficulty of paying for what has come to be regarded as appropriate housing. Housing affordability issues are no longer focussed upon low income renters and there is a recognition in the UK and Australia, and just emerging in Canada, that younger households up to the middle of the income distribution are encountering greater difficulties in accessing rental as well as home-ownership options.

These three broad policy concerns constitute well-evidenced, demonstrably rising challenges to existing policy settings. All three issues have been evident problems in many places since the mid-1990s (MacLennan, 2008) but the relatively recent recognition of the affordability issues has sometimes led to a mistaken belief that the patterns observed have been consequent to the GFC in 2009. The GFC, largely driven by the policy management of the US housing and finance systems, may have exacerbated some of these developments and frustrated the resourcing of policy solutions. However, the adverse policy outcomes identified above appear to have grown for a decade and more before the GFC (Arundel & Doling, 2017). Indeed, the GFC had minor effects on the growth of the Australian and Canadian economies. Rather than severe cyclical instability we must look to the longer term, broad settings for housing policies across the ABC to explain why economic growth has been manifested into intensifying housing system stresses.

In examining the broad thrust of policy change internationally it is important to recognise that policy directions have oscillated within countries. For instance, the UK government fundamentally altered, and then reversed, regulatory and grant support levels applicable to England's non-profit sector within the space of 6 years; the Rudd government broke from the austere path of the Howard administrations housing policies in Australia but his Labour successor (Gillard) divided and diminished the housing portfolio. The subsequent Liberal Prime Minister (Abbott) tightened that contraction while his, still Liberal, successor (Turnbull) allowed a somewhat more open discussion about legitimate Federal housing policies that was also espoused by, his then Treasurer and now successor as Prime Minister, Scott Morrison.

Similarly, after almost a decade of diminishing government in general – and housing, in particular – the Conservative administrations of Stephen Harper have been replaced by the Trudeau government that has stressed the importance of national housing strategies and has identified areas of policy renewal. In 2016 the May government in the UK attached a new significance to housing policy spending and by 2018 had begun to announce some additional resources for the affordable housing sector. Despite these more positive signs for housing policies, oddly, across all three ABC countries there remains little positive narrative of how housing can more effectively impact social justice, competitiveness and sustainability goals. The underlying policy imagination and narrative has shifted little and still seems rooted much in an unimaginative ‘best leave it to the market’ mentality with support or social housing and homelessness seen as crises measures.

The national narratives demonstrate important commonalities in how policy choices after the 1980s have shaped the three main problems nations now face.

### **Social Housing**

In relation to the non-market sector, in the UK social housing investment fell sharply after the 2010 election and policy came to constitute an incoherent mess of poorly designed measures for housing investment set within a punitive reform of wider welfare provision and public-sector budget cuts. In the last three years of the Cameron led-coalition housing policy in England was led by a series of ad hoc initiatives from the Prime Minister’s Advisers rather than the Housing Ministry at DCLG (where most of these policy efforts had been previously consigned to the dustbin as unevidenced and or unworkable).

After almost three decades of cross-party support for expanding the roles and resources of the sector, housing associations suddenly endured a surprising deluge of criticism (in 2015) from senior government Ministers and the Chancellor of the Exchequer and media allies. Associations were deemed inefficient and overly insulated from the market; all of this, a matter of weeks before the government introduced a bill to extend the right to buy to the association sector. More centralised control over the supposedly independent association sector occurred when, after the public spending round was signed off by Ministers, a hole in the social security budget was filled (literally overnight) when it was announced that associations would have to lower rents (and reduce housing benefit bills) for the next three financial years, despite having largely resourced projects with private finance.

These heavy-handed approaches certainly concerned private lenders to NFPs, but even more important, policy was so badly designed that ‘independent’ non-profits were being so controlled by government that they were redefined (reflecting a longstanding concern by the Office for National Statistics) to be ‘public bodies’. Across the UK, this added, at a stroke, £80 billion to public debt in a nation driven to ‘austerity’ to reduce such debts. Albeit that a softer and more careful approach in housing policy has emerged in the post-2016 May administration there is yet no coherent re-understanding of what non-profit and social housing providers are for and how they might change for the new times. Social housing, at least the non-profit sector, after being greatly damaged by policy between 2011-16, in the UK is now beginning to recover policy credibility and resources.

In Australia, a new institutional architecture is being put in place that could help to underpin an expanding, efficient non-profit sector but there has been little sign of the state or federal supports that will lever adequate investment levels or any strategic sense of how to revitalise stagnating stocks of declining quality public housing (Pawson *et al.*, 2017). In Canada, there are significant parallels. Two decades ago the nation delivered close to 25,000 non-profit units per year but – paralleling Australia – now builds only around 3,000 such units annually: housing needs totals are growing. A new funding system for social housing is envisioned as part of a new national housing strategy that, inter alia, aims to remake the social housing sector and introduce income related housing allowances for significant numbers. It is clear, however, that the scale of supporting resources so far announced, does not offer the step-change in affordable housing output required to meet housing needs. Nor, as discussed further below, and in Maclennan and Graham (2017), have housing policymakers grappled with the ‘economic’ as opposed to financial consequences of housing system outcomes. Indeed, looking across all three narratives there appears to be a largely missing narrative about promoting effective housing market policies.

In Australia and Canada there is an emerging urge to give the non-profit sector a bigger role and Australian Federal efforts have intensified in 2017-2018 to create a better conduit for non-profits to access larger volumes of lower cost capital market funds for non-profits. The creation of the THFC in the UK in 1987 did not in itself drive the expansion of the sector. An important lesson from the UK policy narrative (Maclennan and Miao, 2018) is that getting the non-profit sector to a more effective scale required public housing stock transfers and significant capital support to UK associations to lead change. Neither stock transfers nor significant grant support have made much progress on political agendas in Australia and Canada.

## Homelessness

However, in belated response to the growing scale of the problem there has been substantial innovation and progress across countries in advocating programmes to address homelessness. In its approach to tackling homelessness in England, the UK Government has recently emulated its Welsh counterpart by adopting new legislation mandating a more pro-active, prevention-centred approach (Fitzpatrick, *et al.*, 2018). These approaches stress the need for integrated action and recognise the benefits of reducing homelessness as – at least in relation to chronic rough sleepers – manifested in savings on other sectors of public service provision and investment (Parsell, *et al.*, 2017). In Australia, meanwhile, Governments instinctively sceptical about any significant investment in social and affordable housing have demonstrated tolerance to homelessness services expenditure rising at rates far in excess of general inflation (Pawson, *et al.*, 2018). Across all these more hopeful directions, arguably, there is no new narrative and little real policy innovation and a reluctant commitment to raising investment levels sufficiently to reduce existing needs, let alone deal with the emerging issues driven by population growth and ageing (*inter alia*).

## Widening, Deepening Affordability Difficulties

Of the three housing difficulties identified above, governments in all ABC countries seem to have been slow to recognise and understand the growing middle-income/younger household affordability issue. Rent to income ratios have risen in all three systems across a wide spectrum of renters, not just for the poorest households and despite pro-homeownership narratives in all three that age specific home-ownership rates for the 25-40 age groups have been declining for decades in the UK and Australia and more recently in Canada. In effect the rising longevity of over-65s with high achieved home-ownership rates floated national average rates upwards for much of the period after 1980 masking the growing difficulties facing potential first time-buyers. The outcomes now faced by younger households in all three countries seems to reflect a sustained lack of attention to effective housing market policies consequent, arguably, to the naïve view of housing markets embedded in policy framing for housing.

With reduced commitments to public investment in housing and the effective demand for early years home-ownership falling it is unsurprising that the private rental sector has grown significantly in all three nations. Rising house prices constrained the choices of first time buyers. Rising property values attracted both long term, often retirement, savers and speculators alike to purchase and let to the ‘priced out’ young. The new challenges of the PRS and new forms of ownership, with growing buy-to-let were common themes in all three countries.

As price to income ratios (moving in the same direction as more sophisticated measures of the burden of housing payments) for first time buyers have risen steadily (from around 3 to 6 in all three countries in all three countries over the last 20 years) the most common national/federal policy response has been more restrictive financial, regulatory measures requiring larger deposits from potential buyers. That is, financial stability goals have come to dominate efforts to raise home ownership rates from for younger households. These measures are likely to have needlessly damaged ownership prospects for younger households in localities with relatively stable prices and there is little evidence in any of the three national housing narratives that major markets, with more pronounced global connections, have unlinked from other urban and rural settings. CMHC, the RBA and the Bank of England have led the calls for such measures in their national settings but they do not appear to have had much regard to the uninking of major markets (for evidence for the UK, see Chowdhury and Maclennan, 2014) and the different roles that family wealth (as opposed to individual and household wealth) plays in facilitating the purchase of homes by younger households.

In the UK, the slow recovery from the GFC, reflecting ‘austerity’ policy settings, and more recently the short-term effects of the Brexit process have seen more efforts to raise younger home-owner rates. The initially poorly designed Help to Buy programme (National Audit Office, 2016), that has evolved in focus and design since its introduction in 2014, has recently come to support some 40pc of new first-time buyers and been extended to 2021. Younger (25-40-year-old) voter attitudes to the housing choices they are confronted with, in all three countries, seem to be increasingly influencing public sentiment, giving housing a political salience, it has lacked since the 1980s. Households may still have options but housing costs rising ahead of household incomes have narrowed their housing choice sets and shifted decisions about tenure, quality and location trade-offs and impacted more fundamentally important pathways such as forming relationships, having children and accumulating assets for old age.

As in the social sector, problem recognition has not yet been met by new narratives, ideas and means for housing market policies. Opposition parties have, at least in the UK, tended to look back to earlier times and have accordingly played up rent controls and council housebuilding provision in their housing policy programmes. There is no clarity across the ABC in how different balances of support for market rental provision or augmented home-ownership assistance will impact the housing system, life-cycle savings and assets of the young and their abilities to accumulate pension assets by saving through ownership (Maclennan and Graham, 2017). Whilst the right has argued for ‘innovative’ approaches and the left called for more ‘resources’ (and we accept that both will be needed to progress policy aims) the missing discussion is what has happened to housing policy-making and the narratives to support it. The Shaping Futures Group, most of whom had been deeply involved in making housing policy cases for decades confirmed that needs arguments, the conventional ‘merit goods’ cases for housing policy support had lost traction.

## Conclusions from Contrasting the Three Narratives to 2018

National/Federal level governments, as they prepare to rethink policies for homelessness, affordable housing and housing affordability need to set their policy ambitions as a clear set of intended policy outcomes for major national (and local) objectives.

Reading across the narratives from these 3 advanced economies it is striking how little housing policy actions, or reduction of actions, are tied to housing. There is little framing of how the big outcomes that governments strive for are seen to be impacted by housing outcomes. Housing policy has long been about more than ‘housing needs’. Policies are failing to meet needs, and failing to prevent needs queues lengthening. There is good prima facie evidence that housing policies now raise income and wealth inequalities rather than reduce them (Maclennan and Miao, 2017). In Canada, for instance, inequality has increased faster than most OECD countries since the start of the millennium. New doubts are emerging that housing outcomes may be eating up the gains of productivity growth in major metropolitan areas (Maclennan et al, 2018), and it has been long established that the patterns of new housing development in Canada and Australia have some of the worst environmental footprints in the world.

Governments must develop a policy approach that understands and tracks how housing system outcomes impact not just some quantitative needs target or desirable rent to income ratio, but how they influence performance in relation to major government goals such as competitiveness, social justice and mobility and environmental sustainability. We must question, on reading across the policy narratives for the three countries, whether housing policy first advocated to reduce negative externalities, promote fairness for all and – in downturns – stabilise economies, now performs any of these roles.

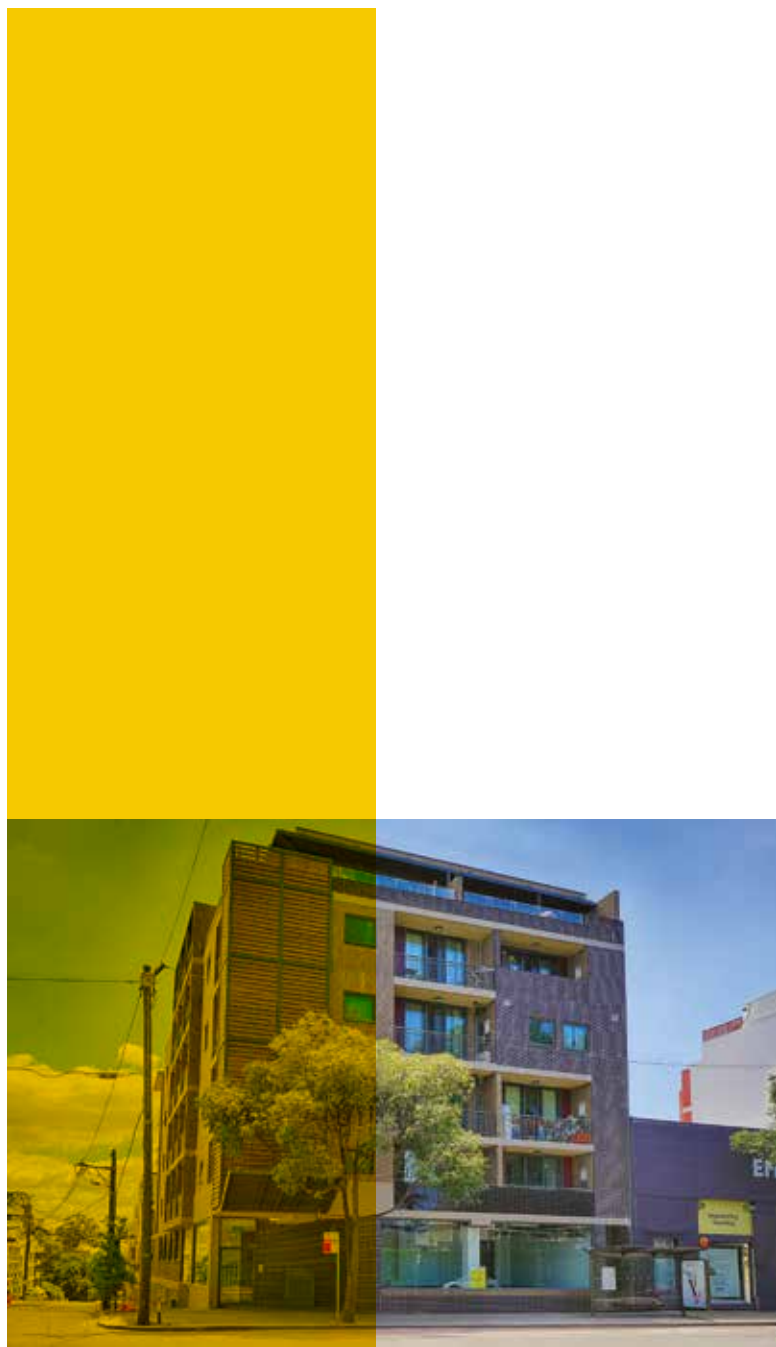
In discussions the Shaping Futures Group drew attention to several limitations of current policy narratives. The group highlighted missing economic understandings as a particular Achilles heel of narratives to support better housing outcomes, and this issue is addressed in Chapter 11. The Group, in looking at the roles of major metropolitan areas, drew attention to the need to give a new outward looking dimension to national and local housing policies as the discussions revealed that national and metropolitan housing policies had been generally weak in considering the global context. They also remarked on the absence of any strategic approaches to the widespread housing affordability pressures identified in all three countries and took the view that they will not be resolved unless there is a rebalancing not just of housing policies but major policy settings shaping housing investment. These, and other issues raised in the national policy narratives, will be explored in the subsequent chapters of this report and broad approaches for the future set out in the concluding chapter.

**There is no clarity across the ABC in how different balances of support for market rental provision or augmented home-ownership assistance will impact the housing system, life-cycle savings and assets of the young and their abilities to accumulate pension assets by saving through ownership**

(Maclennan and Graham, 2017)

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