

**Submission to the New Zealand
Productivity Commission**

“Using Land for Housing”

By: New Zealand Housing Foundation
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The New Zealand Housing Foundation

The New Zealand Housing Foundation is a “not profit” charitable housing trust, driven by strong social imperatives to assist social and affordable housing needs in New Zealand, while operating with a strong business philosophy.

The Housing Foundation works to a set of key objectives which are:

- To initiate, facilitate and deliver a range of affordable and sustainable housing options for low income people;
- To be a catalyst/enabler for integrated mixed tenure housing projects which would otherwise not happen;
- To help develop a robust community housing sector that promotes innovative, sustainable housing targeted to need; and
- To work in an open, collaborative way with other organisations, councils and central government to deliver housing projects and programmes.

The Housing Foundation funds its operations from a mix of philanthropic funds, government grants, social and commercial debt facilities on a project by project basis. It doesn't make a profit that it can return as dividends, but it contributes any surpluses it achieves into subsidising the share in the value of the homes (often for an extended period) it builds. This subsidy is an essential component for social and affordable housing, it is retained and can be recycled to other households with similar affordable housing needs.

Since it was established in 2003 the Housing Foundation has built, funded and project managed the construction of more than 350 affordable homes for households, other community housing organisations and the private sector. In 2015 and 2016 the Housing Foundation will build and project manage the construction of a further 100 homes across the Auckland region. All homes are designed to be affordable for purchase and rent, while remaining affordable for the household to maintain and live in during the duration of their tenure.

1: Introduction

The effective management and regulation of land supply (or development capacity) for urban centres are critical for a housing market to operate effectively, prevent market failures, and improve housing affordability. In New Zealand, this role is allocated to local authorities and regional councils by the Resource Management Act (1991), the Local Government Act 2002) and the Land Transport Management Act (2003). Central Government's main influence on this process is through developing and issuing National Policy Statements, National Environmental Standards, and Coastal Policy Statements.

The goal of our submission is to address a number of concerns we have about the way in which land supply/development capacity is administered and regulated. Land supply/development capacity directly influences the market's ability to grow housing supply and consequently housing market outcomes. The focus of our submission relates to our experiences in the Auckland market, however parallels can be drawn with other housing markets around the country.

Our submission addresses four areas impacting on using land for housing and these include:

- The role of local authorities in planning and development;
- The impact of development capacity on the supply of affordable housing;
- Ways in which councils can fund infrastructure in high growth areas; and
- The advantages and disadvantages of housing accords and the Special Housing Areas Act 2013.

The Housing Foundation would like the opportunity to meet with the Commissioners and Commission Officers to further explain and discuss its submission and our experiences that have led to our recommendations.

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2: Context

Barker (2004), identified housing supply constraints including development capacity as a significant influence on house prices and hence affordability. There are two important aspects to supply side considerations. First, the total quantum of development capacity can influence the market's ability to respond to changes in supply. Second, especially in the short term, the relative sluggishness of the market's ability to respond to changes in demand is equally as important. MacLennan (2008) suggested *"Rising demand with inelastic supply has meant significant increases in real land prices and in consequence, increased 'economic rents' for land and home owners. Sluggish supply appears to be an inherent feature of housing systems but there are cross country and cross period differences in response patterns. These can arise from planning differences, infrastructure shortages, and market failures."*(Page 10).

Higher land and dwelling prices as a result of constrained land supply and/or the ability of the market to respond to changes in demand can lead to a decline in housing affordability. Affordability constraints can result in families and households making tradeoffs in relation to housing, which subsequently have a negative impact on their wellbeing. For example, to reduce the rental or purchase cost of a house, a family may move into a dwelling which is substandard, remote, or overcrowded. In the longer term, this choice may mean that the household faces additional costs, such as higher transport or heating costs, and is no better off financially.

When housing is in short supply and is expensive, low income families may respond by sharing accommodation to manage cost. This may result in overcrowded households, which in turn can affect the health of household members and may lead to an increased incidence of contagious diseases (Baker, McNicholas, Garrett, Jones, Stewart, and Koberson, 2000).

The social and economic costs of unaffordable housing are not just incurred by individual households; they come at a cost to the wider community, including regional economic development and growth, employers, and central government in terms of the increased public spend on healthcare, welfare and policing (Gabriel, et al, 2005).

3. The role of local authorities in planning and development

The coordination of land use and managing externalities is a key role of the planning system. Councils need to provide a greater level of leadership and when considering the impact of externalities of a development, particularly when considering where residential intensification can occur, on adjoining properties these need to be better balanced against the positive impact a development may have on the wider community. Auckland appears to be a city that wants a compact urban form provided it does not impact on individuals living next to them. This is particularly the case in high value and high amenity areas where people want to live the most.

This section of our submission relates to the following questions in your issues paper:

- Question 1 - Is it helpful to think of the planning system and development system as a means of dealing with externalities associated with land use and coordination problems? What other factors should the commission consider in evaluating the role of the planning and development system?
- Question 13 - How can the plan development process be improved to increase the supply of development capacity?
- Question 14 – How accurate are local authority assessments of demand for and supply of land
- Question 15 - How well do zoning decisions in District Plans and Infrastructure planning in long term plans reflect demand and supply forecasts
- Question 16 – How effective are local authorities in ensuring that the rules and regulations governing land use are necessary and proportionate?

Question 1 - Is it helpful to think of the planning system and development system as a means of dealing with externalities associated with land use and coordination problems? What other factors should the commission consider in evaluating the role of the planning and development system?

Council needs to be objective and focus on the issues and the impact of the intensification rather than the political debate and the undue influence of people adversely affected by proposed developments. Cities need to continually evolve to remain relevant. Recent comments typical of existing residents trying to preserve their existing environment at the expense of the wider community are:

The Grey Lynn Residents Association, which has a number of heritage and special character state homes in its neighbourhood, were dismayed at the corporation's submission. "We are empathetic to Housing NZ's wish to house more people ... [but] the heritage overlay is absolutely critical to the fabric of Grey Lynn," said spokeswoman Nicola Legat. Lynne Butler, Freemans Bay Residents Association co-chair, said: "To start pepper-potting [properties in] Freemans Bay will have a huge impact on the character of the streets." – (NZ Herald 11th July 2014).

Council often struggle with these issues as local body politicians become involved. Understandably residents faced with negative externalities from developments near their properties will have concerns. However the council's role is to provide the leadership to balance these negative externalities against the wider benefits to the whole community by increasing the supply of housing in locations where people want to live. Typically, in Auckland, council has restricted intensification, or has imposed rules and regulations such that it is not profitable or practical, in high value locations.

Overseas research suggests density and heritage controls preserve the value of the existing residents' properties at the expense of the wider community by preventing increases in supply. For example *"Residents in high income suburbs revel in the 10% to 15% increases in housing prices. Almost no one seems to understand the benefits are mostly illusory or that they result substantially from government restrictions on housing supply"* Mills (2005).

In addition planning administrative zones should mirror housing market boundaries¹. This allows consistency in terms of rules and regulations across administrative zones and prevents competition between local authorities. This prevents the situation where one council pursues a compact urban form whilst other councils within the housing market encourage greenfield development.

Although this issue has largely been remedied in Auckland (by the formation of Auckland Council and the proposed Unitary Plan) it is still an issue in a number of other locations where the housing market extends across a number of local authorities. Examples of areas with more than one administrative area with a housing market include Wellington metropolitan area, Nelson City/Tasman District, Christchurch metropolitan area, Hamilton City/Waikato District housing markets.

Question 13 - How can the plan development process be improved to increase the supply of development capacity?

Residential development capacity is a key issue contributing to housing market volatility and housing affordability in New Zealand, particularly in the high growth markets such as Auckland. Councils' planning rules, regulations, and the process around their implementation have a significant impact on the effective supply of residential development sites (and as a consequence housing supply), and the costs and uncertainty associated with residential development. Councils have an important role in effectively administering the consenting process and providing a clearly strategy for future development and the infrastructure funding to support it.

¹ Internationally housing market boundaries are considered to correlate with labour market boundaries. In New Zealand, All the major metropolitan areas have one labour and housing market (MERA, 2014).

In order to improve the development process councils should:

- Set a strategy and vision for the future development of the housing market - Clearly set out a future development strategy combined with the coordinated expansion of the associated infrastructure;
- Ensure there is adequate supply of land across all styles of land supply/development capacity;
- Provide leadership within the community and ensure the best outcomes for all; and
- Amalgamate to ensure administrative areas encapsulate whole housing market boundaries.

Set the strategic direction for the future development of the market and ensure there is adequate land supply/development capacity

The planning process provides councils with the opportunity to set the strategy for future development in the housing market by ensuring there is sufficient development capacity allocated across a range of development types (greenfield, infill, and redevelopment) and ensuring planning rules and regulations and the way they are administered enables the supply of a range of dwelling typologies which reflect the underlying growth in demand. In addition, councils can have a positive impact on housing supply by:

- Enabling an increase in the supply of housing. Ideally, a minimum of 5 years' worth of readily developable capacity needs to be available across all types of development². The uptake needs to be regularly monitored and additional capacity added as potential supply is used. The development capacity should be spread across greenfield, infill, and redevelopment sites.
- Enabling the development of a range of housing types, and encourage innovative design. Christchurch's changing demographic profile reflects a trend towards a greater demand for smaller dwellings with fewer bedrooms and with an increased proportion of multi-unit dwellings.
- Providing greater opportunity for intensification. It is possible to supply Multi-unit dwellings at lower cost than standalone dwellings and make more efficient use of the available land. Enabling this style of development will assist with improving housing affordability. Encouraging intensification could be done by allowing redevelopment to occur as of right and limiting what needs to be notified, therefore providing developers with more certainty. These developments need to be profitable for the developer and in locations where people want to live. Consequently, council needs to work with the development community to ensure development capacity is provided in the locations where it is economically feasible to develop. Ideally, these should be concentrated in locations with high amenity value, have access to good transport routes, and typically focus on the higher value suburbs.
- Enabling the redevelopment of existing residential areas. Redevelopment within the existing residential areas will provide the opportunity to increase housing supply close to amenities and essential services. Typically these sites would be redeveloped into

² Livingston and Associates (2011)

more intensive housing typologies and provide alternative styles of dwelling (for example, townhouse, terraced house, or apartment). In addition, redevelopment can make better use of the existing infrastructure in the city.

- Identifying the future development capacity for the wider housing market over the next 15 to 20 years together with the timing associated with the development of the infrastructure (water, storm water, waste water, roading and public transport). This expenditure should be budgeted for within the council's long term plan. This will assist in providing strategic direction for the development community. The level of development capacity across all categories needs to be regularly monitored and added to as it is used up.
- Being clear and objective, and not unduly stifle development or impose costs on developers. Consenting processes should be streamlined and simplified as to produce optimal planning outcomes.
- Discouraging development in locations subject to natural hazards (for example flooding or unstable ground) protecting the community from these long term risks.

Question 14 – How accurate are local authority assessments of demand for and supply of land

Forecasting future outcomes is a challenging task and all organisations, including councils will struggle to accurately predict future outcomes. Consequently, rather than striving to develop the most accurate forecast possible it is more important for councils to have a structured process in place to monitor and review the demand and supply. For example, councils need to ensure there is sufficient readily developable and appropriately zoned land to meet at least 5 years worth of demand across all development classes. Combined with regular monitoring of uptake provides councils with a buffer to react to change in demand and either increase or slow down the rate of infrastructure development to main this level of supply.

In addition, councils have limited perception of the distribution of demand across the urban area. Many people want to live in areas where intensification is expressively not allowed. This drives high prices in these locations as supply is scarce. Allowing intensification in these areas would assist in reducing the pressure in the house market in other locations. It would also provide residents with choice across a range of dwelling typologies.

Question 15 - How well do zoning decisions in District Plans and Infrastructure planning in long term plans reflect demand and supply forecasts

It is important the zoning decisions, which should reflect council's strategic vision for the future development of the housing market, are reflected in the long term plan to ensure the required investment in infrastructure is included in expected expenditure.

Question 16 – How effective are local authorities in ensuring that the rules and regulations governing land use are necessary and proportionate?

Councils have an important role developing and administering the planning rules and regulations associated with the use of land for residential development and occupation. Developers often see council imposed rules and regulations as increasing the cost of developing the land and reducing the yield (number of dwellings per hectare) with limited regard to their costs and benefits.

It is appropriate for council's to regulate land use for housing however they need to ensure they do not over regulate the market and ensure the rules and regulations in place are efficiently administered.

Rules and regulations such as section size restrictions (both minimum and maximum), dwelling orientation on the site, height restrictions and density controls, heritage areas, roading requirements associated with reserves, policies reserve requirements around water ways and ephemeral streams, protection of trees, the requirement to plant to only native trees sourced from local nurseries, all influence developers ability to efficiently utilise land. These impact on the use for land for housing by influencing the yield (number of sections per hectare) and/or the development costs.

One recent example of a new rule is under the proposed Auckland Unitary plan is the minimum floor to ceiling height within an apartment building which is set at 2.7 metres. Current industry practice in lower cost apartment developments is 2.4 metres. The increase in height increases the cost of an apartment and reduces the number of apartments within the same building envelope. It is difficult to understand the justification for such a rule. This makes for a less efficient use of the land for housing. Council should have to demonstrate the benefit of these rules is greater than the cost.

Administration of rules and regulations is just as important as the rules themselves. Developers felt that there is a lack of alignment between the council's (planning) goals/plans and those of the related council agencies (parks and reserves, Auckland Transport, urban design, Watercare). This results in developers trying to mediate disputes over how the development should be designed between different parts of council. In addition, developers held the view that there was little or no accountability or pressure on council staff to seek to resolve inter-departmental differences. Consequently, developers felt that this process was dysfunctional with no-one within Council balancing/arbitrating the contradictory demands by different parts of the organisation and the related council controlled organisations (CCOs). This makes for an inefficient process, adds to the development cost, and impacts the use of land for housing.

Our recommendation is:

- Councils are required to set a strategy and vision for the future development of the housing market - Clearly set out a future development strategy combined with the coordinated expansion of the associated infrastructure;
- Council's ensure there is adequate supply of land across all styles of land supply/development capacity;
- Provide leadership within the community and ensure the best outcomes for all; and
- The administration of a housing market is encapsulated into one administrative area.
- Councils regularly monitor and review the level of development capacity and revise zoning and infrastructure expenditure as appropriate to ensure supply of developed sites is not restricted.
- Councils justify any new rules and regulations with an analysis of the costs and benefits.
- Councils are required to review the impact (costs and benefits) of existing rules and regulations when District Plans are reviewed.

4: The impact of development capacity on the supply of affordable housing

Question 4 – Would a significant increase in development capacity lead to an increase in the supply of affordable housing or would further regulatory intervention be required to achieve that outcome.

Markets with constrained development capacity will tend to have high land values as developers bid up prices. Development capacity on its own will not solve housing affordability outcomes however appropriate levels of development capacity in locations where it is profitable for developers to develop allow the market flexibility to respond to changes in demand and minimise the impact on price.

Auckland during the 2000s is an example of how local authorities can restrict development capacity and as a result have higher prices. A number of factors may have restricted development capacity, (which also encompasses the redevelopment of brownfield sites). These include:

- Planning regulations and restrictions on where greenfield developments can occur. These include policies such as the metropolitan urban limit (MUL);
- Limitations on where intensification and infill can occur within the existing urban area;
- Efficiency of the resource consent process; and
- A lack of infrastructure expenditure.

Grimes and Liang (2007) undertook a key study on the impact of the MUL on land values. Their results suggest that there does appear to be a significant boundary effect which is likely to have influenced land values within the MUL. They also concluded that higher land values are likely to have impacted on house prices and housing affordability across the region. Thus, they concluded the MUL is likely to have limited greenfield development capacity during the mid-2000s resulting in higher house prices and consequently, an adverse impact on housing affordability.

MacLennan (2009) in his critique of Grimes and Liang's study suggested that although they had established a prima facie case in terms of the MUL's impact on land values, there may also be benefits that at least partly offset some of the costs associated with higher land prices, however these have never been quantified. Lack of significant opportunity to intensify existing urban area outside the CBD may have also meant that some of the benefits that may have potentially accrued from the MUL could have been lost.

First, there needs to be adequate development capacity within the urban area and careful consideration needs to be given to how readily developable the land is in terms of the constraints which limit its potential for development. In addition, a minimum of 15 to 20 years of capacity across a range of development types (greenfield, infill, brownfield, and intensification) needs to be included within the urban area. The balance between these is a strategic issue and conflict exists between the desire for a compact city whilst trying to ensure greenfield land is not unduly restricted. The capacity limits need to be regularly reviewed with adjustments made so that capacity does not fall below 15 to 20 years. If the capacity is reviewed every three years and the review process takes two years then 20 to 25 years worth of supply would be required on the completion of each review. In addition, a minimum of five years worth of development capacity should be able to be developed with minimum constraints.

Over time this approach is likely to improve housing affordability, however in the short to medium term changes will have a more limited impact. Further regulatory intervention maybe required, such as the requirement to provide a percentage of affordable housing within a development. Our view is affordability should be based on local community household incomes rather than regional values. This would ensure house prices and income levels are related to the location and the communities need, compared to what exists in the Auckland Accord. It also means developers in high value areas are not unduly penalised by relatively low regional average house prices compared to the local house price.

Under the current regulatory environment, any uplift in land value as a result of a change in zoning is captured by the owner of the land. The Housing Foundation believes that council should capture a percentage of the value uplift in the price of the land resulting from zoning changes which increases density. This should be ring fenced and used to increase the supply of new affordable housing in the location or in other agreed areas determined by housing need/demand analysis for affordable housing.

Our recommendations are:

- *Councils are required to ensure they have both an appropriate level of readily developable and future supply of residential land/development capacity spread across greenfield, infill, brownfield and potential intensification sites.*
- *Councils regularly monitor and review the level of development capacity and revise zoning and infrastructure expenditure as appropriate to ensure supply of dwellings is not restricted.*
- *A proportional of a development must be affordable in the context of local community household incomes and house prices.*
- *A betterment tax or rating differential is used by council to capture a percentage of any up lift in value as a result of a change in zoning that increases density. This income must be used by council to increase the supply of affordable housing.*

5: Ways in which councils can fund infrastructure in high growth areas

Question 58 – Do councils in high growth areas require a greater range of approaches for funding infrastructure?

Councils in high growth housing markets are faced with significant challenges associated with the funding of infrastructure. Infrastructure (water, sewage and waste water, and roading) are critical elements required to enable the development community to provide housing. Council's role is to provide the bulk infrastructure to areas to make the land readily available for development. To date, Councils and key utility providers (such as Watercare) have funded the majority of the cost via development contributions (tax on developments during the consenting process) and via general rates. Developers pass these upfront costs in house prices. Key issues include development contributions, and utilities providers' charges.

There is no doubt councils and infrastructure providers need to ensure that the necessary infrastructure is in place before development needs to take place. Our key concern focuses on the level of charges and would encourage their use as a tool to encourage development in different locations and increase density. In addition other funding strategies like betterment taxes or rating differentials could be used to fund infrastructure in a more efficient manner.

Local authorities use the provisions within Resource Management Act to plan and manage the way in which an urban area develops. As part of the planning regime they have levied development contributions on developers to pay for infrastructure (or upgrade existing infrastructure) required. The way in which these levies are calculated varies significantly across the different local authorities. How and who pays for the infrastructure used by a development has been well debated over the last couple of decades. Rather than traverse these issues, it is our view that the way in which the levies are collected should be reviewed.

Typically, levies are charged as upfront payments which developers treat as a cost and increase the price of a new dwelling. There are a number of other alternative approaches that could be employed which may produce more affordable outcomes. For example, rather than collecting a levy upfront a special rate could be charged across the properties benefiting from the new or upgraded infrastructure which collects the cost of the asset over its effective life. This would reduce the initial cost to the developer while still collecting the same infrastructure tax overtime.

Another strategy that could be used to fund infrastructure is a betterment tax. For example, when an area's zoning is changed (to allow a higher value use such as a more so that it allows intensive development) the underlying land values typically increase, provide demand exists for a more intensive use. The benefit of the increase in value is enjoyed solely by the owner of the property. Betterment tax regimes capture some of the increase in value for the public good. The tax can then be used to pay for some of the infrastructure costs, or a proportion could be used to subsidise affordable housing.

Councils and associated utility providers have monopolistic powers to charge developers a range of development contributions and fees. These are effectively a tax on the development. Grimes and Mitchell (2014) found developers considered utility providers, such as Watercare, behave in a monopolistic manner. Developers view was that they can charge like and Council will not issue a section 224(c) certificate and the sale cannot settle until they have paid.

"Development contributions under the Local Government Act (2002) were not originally intended to be used as a tool to direct urban form or achieve a particular environmental outcome, Internal Affairs (2013). However, they do have the potential to influence growth through contribution levels and thereby influencing the costs of building in different locations and typologies. At the present point in time the same level of development contributions are payable regardless of whether the dwellings are a small two bedroom terrace house or a six bedroom and six bathroom large house. Although it may require changes in legislation development contributions calculated as a percentage of cost or value could encourage the construction of smaller lower cost units. This is another approach the Commission should consider as a way of improving the use of land for housing.

Our recommendations are:

- *Council's and utility providers need to justify their taxes (development and other contributions) on developers and greater regulation is required on the level of charges which can be applied.*
- *Central government should consider providing a maximum level councils and utility providers can charge in development levies and contributions;*
- *Local and central government should investigate using rating differential to pay for infrastructure development spreading the repayment of the infrastructure investment over a longer time period rather than collecting in an upfront payment*

6: The advantages and disadvantages of housing accords and the Special Housing Areas Act 2013.

Question 72: What are the advantages and disadvantages of the Housing Accords and Special Housing Areas Act 2013?

The Housing Accords and Special Housing Areas Act 2013 1 (“the Act”) came into force on 16 September 2013. The purpose of the Act is to enhance housing affordability by facilitating an increase in land and housing supply in certain regions or districts identified as having housing supply and affordability issues. The Act allows the Government to identify regions and districts with significant housing supply and affordability issues, and include them in a schedule by way of an Order in Council 2 . Currently, Auckland is the only region that has been identified and included.

The Act, alongside agreements between territorial authorities and the Government (known as Housing Accords), will allow for the establishment of Special Housing Areas within identified regions. Inside these Special Housing Areas, Qualifying Developments will be afforded a more streamlined consenting process, rather than having to comply with the normal timeframes set out in the Resource Management Act 1991. To be considered a Qualifying Development, the development in question must be predominantly residential and satisfy certain criteria relating to height and density. This streamlined process will allow for Qualifying Developments to be processed within 60 working days, with limited appeal rights to the Environment Court.

The first Housing Accord 3 has already been agreed to between the Auckland Council and the Government. The Auckland Housing Accord is intended to increase housing supply and improve housing affordability in the Auckland region through greenfield and brownfield developments, with a target of 39,000 homes to be built in the next three years. The Accord came into effect on September 30, the date the Auckland Unitary Plan was notified, and was ratified on October 3 by the Minister of Housing, Nick Smith, and the Mayor of Auckland, Len Brown.

However, in an Auckland context our view is the process has been poorly implemented. The focus appears to be on getting consents issued rather than increasing the supply of affordable ready to develop sites. To date, 80 special housing areas with the potential for 41,500 dwellings have been created in Auckland, however, only 350 houses have been built. Anecdotal evidence suggests some developers (and land bankers) who own land within the special housing areas are gaining consents for their properties and holding their properties waiting for values to rise.

A key to improving the process is ensuring there is sufficient infrastructure expenditure allocated with council’s Long Term Plan to provide the expenditure required to unlock the city’s development capacity.

Our recommendation is.

- *In addition to monitoring the number of consents issued within the special housing areas, Auckland Council should also focus on increasing the city's supply of serviced ready to develop land. This could be funded by a rates differential³ or betterment tax.*
- *Introducing a sun set clause for consents for developments (a use it or lose it clause) within a special housing area (combined with a rates differential or betterment tax) may be a way of reducing land owners holding property for capital gain*

³ In this context the rates differential refers to additional rates (levied against the land rates charged a higher rate of the dollar value of the property compared to other residential properties) to pay for the infrastructure.

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