

# Housing Policies in the UK, Switzerland and the US: Lessons Learned

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(Paper joint with Olivier Schöni, SERC)

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#### Outline



- Focus on three developed countries in Western world – UK, Switzerland and US – and explore each country's key housing policies and their merits and demerits
- Explore...
  - **Current status of housing market** main challenges and risks
  - **Main housing policies** in UK, CH, and US How do they work? & main objectives?

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- **Merits and demerits** of key policies **3**.
- What are the **lessons learned**?

## United Kingdom

(builds mainly on Hilber 2015 & Hilber and Vermeulen, EJ, forth.)



## Current status of British housing market(s)

#### **UK faces extreme housing affordability crisis**

- House price per square meter 2<sup>nd</sup> highest in world (topped only by Monaco)
- New built homes 38% and 40% smaller than in similarly densely populated NL and GER
- Price to income multiple at record high
  - 5.0 UK & 8.5 London
- Homeownership rate in decline since 2002

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69.3% (2002) to 63.5% (2013)

## Current status of British housing market(s)

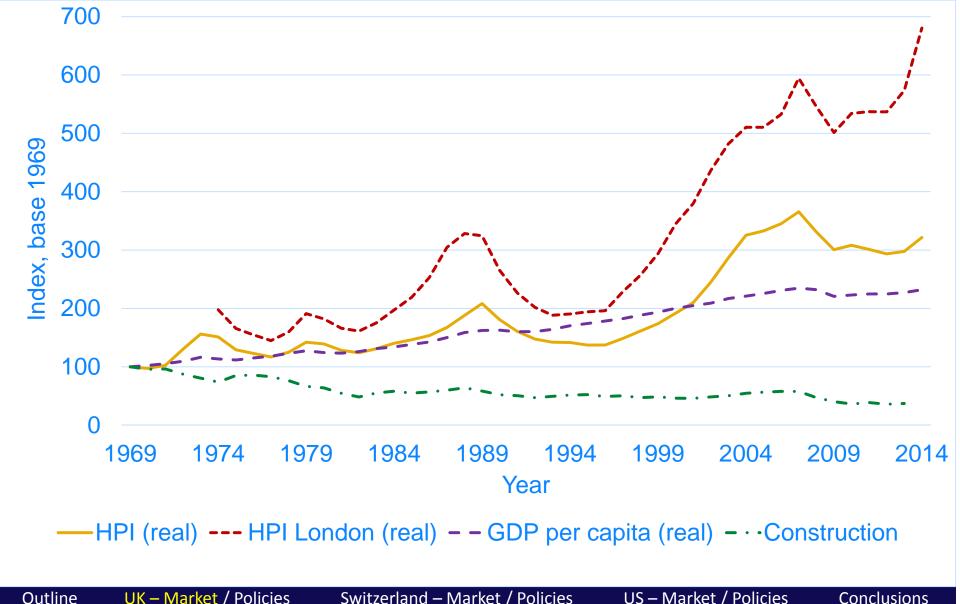
#### Crisis has slowly emerged over last 40 years

- Real house prices grew faster in UK over last 40 years than in any other OECD country
  - London far outstripped rest of UK
- Housing construction in steady decline since late 1960s (despite strong price growth)
  - Today 1/3 of construction of late 1960s

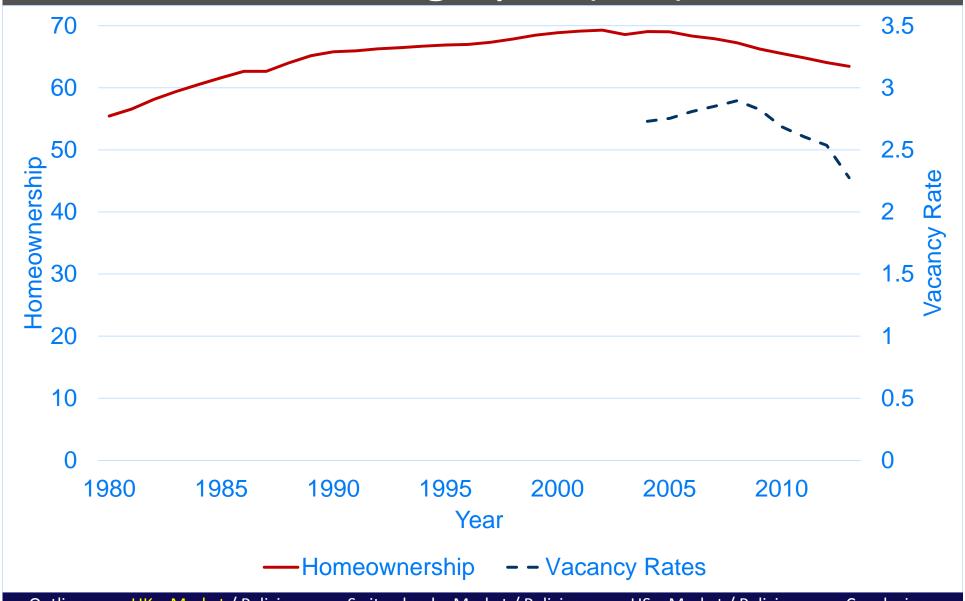
#### House prices also extremely volatile

- During last full cycle (80s/90s): UK as a whole substantially more volatile in real terms than single most volatile market in US
  - UK: +83%/-38% vs. Los Angeles: +67%/-33%

## Current status of British housing market(s) in two graphs (1/2)



## Current status of British housing market(s) in two graphs (2/2)

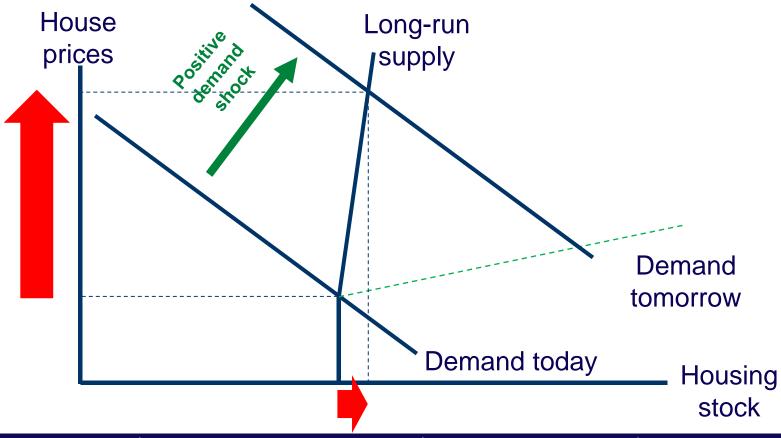


#### What caused the crisis?

- British planning system is extraordinarily rigid by world standards
  - Extreme form of urban containment through green belts (introduced in mid-1950s)
  - Strict controls on height
  - Local authorities face most of the cost of development (infrastructure, congestion) but few of the benefits (little tax revenue), so have no incentives to permit development
  - 'Development control': There are no zones designated for residential use – each plot of land requires separate planning application & approval
  - Each application is subject to objection by NIMBYhomeowners (or in UK better: BANANAs)

## Implications for British housing market(s)

 Housing supply curve becomes extremely inelastic, particularly in London & South East



#### UK housing policies

- British housing policies focus on addressing housing affordability crisis & providing access to homeownership
- Three key policies:
  - 1. Social housing (or "council housing")
  - 2. Right-to-buy
  - 3. Help-to-buy

## UK: 1) Social Housing

- In place since 1919 to help "those in need"
  - Originally only provided by local authorities ("council housing")
  - Later also by "housing associations" = private, nonprofit org. but regulated & receive public funding

#### Merits

- Provides low cost housing for households in "priority need" (homeless other 'vulnerable' people according to priority criteria)
- Does <u>not</u> appear to be associated with negative peer effects, adversely affecting student performance (Weinhardt, 2014)

#### UK: 1) Social Housing—Cont.

#### Demerits

- Associated with poor housing conditions & corruption
  - By 1970s council estates became "grim havens of decay and lawlessness" and there was a "powerful smell of corruption...as the cosy relationship of local politicians and their friends in building and architecture was laid bare" (Wheeler, 2015)
- Inefficiencies and welfare losses associated with undersupply and misallocation (due to long waiting lines)
- The 'clever', 'patient', and 'persistent' are successful rather than those 'most in need'
- Taxes necessary to fund rental subsidies are associated with deadweight loss

## UK: 2) Right-to-Buy

#### Introduced in 1980 by Margaret Thatcher

- Policy allowed "council estate" tenants to purchase their homes at significantly subsidized price
- Explains rise in homeownership during 1980s/90s
- Now: Conservatives promised to extend policy to housing association tenants in next parliament

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#### Merit

Outline

 Rise in homeownership attainment (desirable to the extent that social benefits > social costs) – literature is ambiguous

## UK: 2) Right-to-Buy—Cont.

#### Demerits

- ▶ Best social housing stock moved from socially rented to privately owned ⇒ potentially fosters "ghettos"
- ► Taxes necessary to fund subsidies are associated with deadweight losses
  - If government does not reimburse housing associations, then this will endanger their ability to finance construction of new homes
- Does <u>not</u> help solve housing affordability crisis
  - Aggregate demand and aggregate supply are unchanged
  - Fosters NIMBY-homeowner influence

## UK: 3) Help-to-Buy

#### Introduced in 2013 by Coalition Government

- Policy aimed to stimulate housing demand
- Policy consists of four instruments: equity loans, mortgage guarantees, shared ownership, and a 'new buy' scheme that permits LTV of up to 95%

#### Merit

Probably none because demand increase in UK does not lead to more construction & price increase offsets incentives to own

Switzerland – Market / Policies

Conclusions

## UK: 3) Help-to-Buy—Cont.

#### Demerits

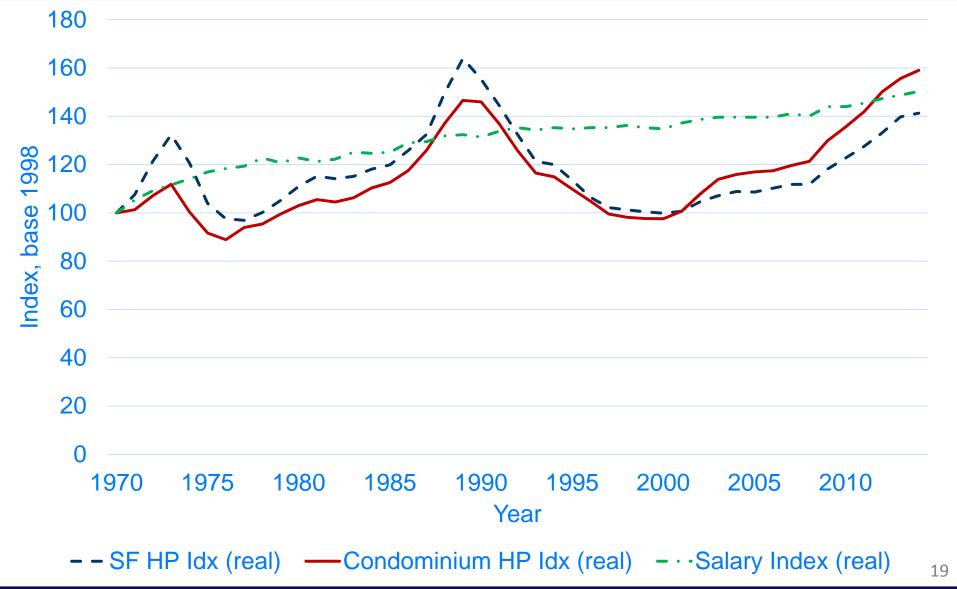
- Likely helped foster price boom: House prices in London up by 26% in year following announcement of policy
  - Does <u>not</u> help solve housing affordability crisis
  - Housing less affordable for young would-be-buyers
- Taxes necessary to fund subsidies are associated with deadweight losses
- Generates systemic risk in that government assumes most of the risks + remaining risks assumed by marginal homebuyers
- Scheme is difficult to withdraw since possible price drop unpopular

# Switzerland (builds mainly on Werczberger 1997 & Hilber and Schoeni, work in progress) Outline

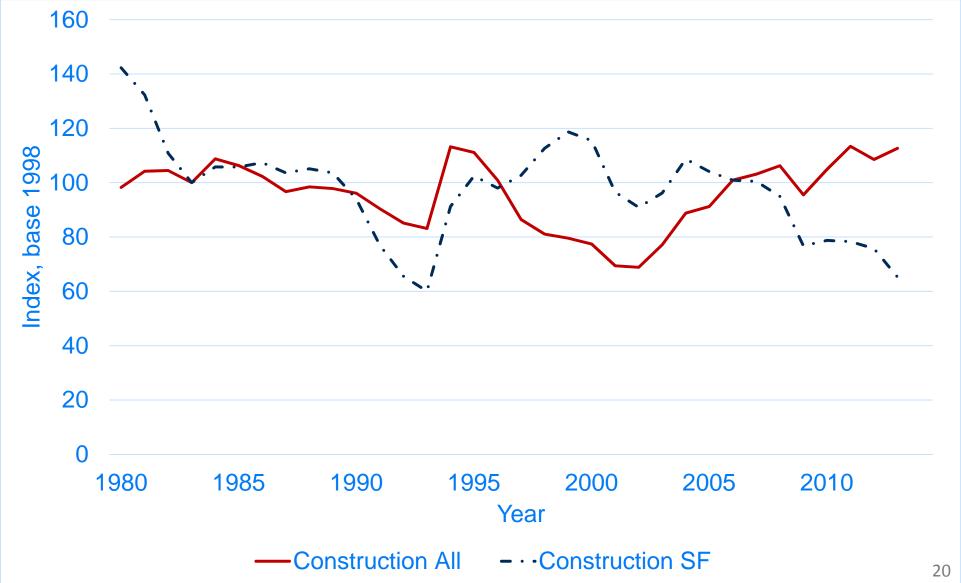
## Current status of Swiss housing market

- Switzerland is a country of renters (37.5% owned in 2013)
  - ▶ But homeownership rate on the rise with 2.9% increase since 2000
- Property market is characterized by moderate price and construction boom since around turn of millennium
  - Driven mainly by condominium-boom in booming cities & tourist areas
  - ► CH has 1/8 of pop. of UK but 1/3 of its construction (2013)
  - CH: real SF HP increase since 1974: 17%
  - ▶ UK / London: real HP increase since 1974: 113% / 244%
- ⇒ Sustained construction boom created sprawl problem

## Current status of Swiss housing market (1)



## Current status of Swiss housing market (2)



**Conclusions** 

## What caused sprawl problem?

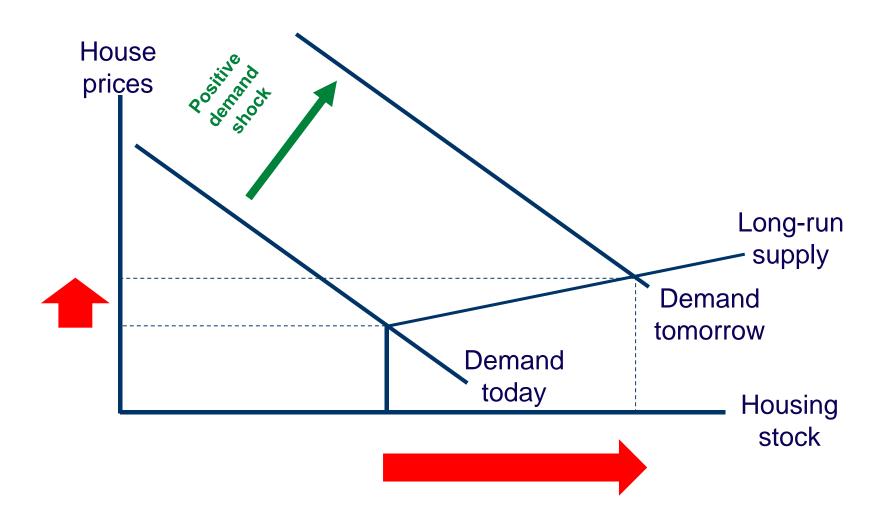
#### On supply side:

- Local public services in Switzerland financed via local income taxes
  - Strong incentives for local municipalities to attract new (wealthy) tax payers
  - Strong incentives to permit development

#### On demand side:

- Strong immigration & robust economy throughout great recession
- Extremely low interest rates (fixed rate mortgages around 1%)

## Implications for Swiss housing market(s)



## Swiss housing policies

- Swiss housing policies focus on stabilizing rents & combat sprawl
- Two key policies:
  - 1. Rent control
  - 2. Restrictions on construction of 'second homes' ("Second home initiative")

#### CH: 1) Rent Control

- Introduced first during World War I
  - Abolished and reintroduced several times since then, 'permanent' since 1972
- Today's form of rent control fairly flexible:
  - Landlords can increase rents but must justify
  - Rent levels linked to two economic indicators average mortgage interest rate and CPI
  - Only other justification for rent increase: major renovation
  - Also renters are protected against 'abusive evictions'

#### CH: 1) Rent Control—Cont.

#### Merits

► Real rents are increasing fairly moderately & steadily (by less than 33% since 1983)

#### Demerits

- Welfare losses associated with undersupply and misallocation (Glaeser & Luttmer, 2003)
  - Extremely low vacancy rates in CH
- Private landlords have strong incentives to select 'good tenants' making it more difficult for disadvantaged to rent
- Rent control may reduce HH mobility (Ault et al., 1994)
- Lowers housing quality (Gyourko and Linneman, 1990)
  - Not observed in CH since law ensures minimum quality standards + renovation provides justification for increasing rents

#### CH: 2) Restricting construction of 2<sup>nd</sup> homes

- 'Second home initiative' was approved by Swiss population in March 2012 with 50.6% of votes and just over half of cantons (13.5 out of 26)
- Idea: Municipalities with second home share > 20% of all houses are banned from building any new second homes
- Merit

UK – Market / Policies

Reduces sprawl in most touristic areas of country with 2<sup>nd</sup> home share >20% (to extent no loopholes are found in law)

#### CH: 2) Restricting construction of 2<sup>nd</sup> homes—Cont.

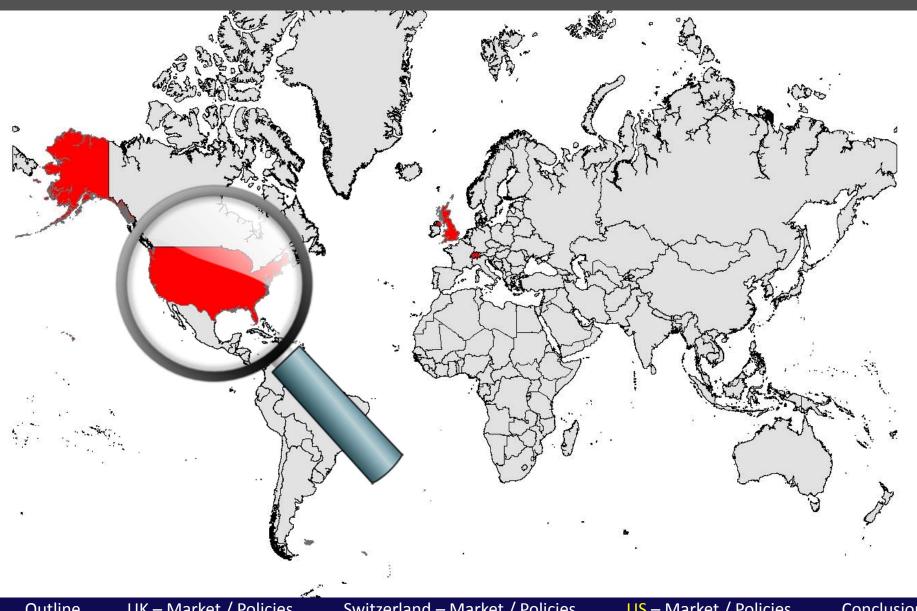
#### Demerits

- ► Loopholes: Sell existing house as 2<sup>nd</sup> home and build new first home; build hotels and rent out; merge neighboring municipalities to lower share below 20% etc.
- Demand will shift from most touristic areas to municipalities just below 20% 

  ⇒ sprawl will just shift geographically
- ► There may be big price and rent increases for first homes in municipalities 'just below 20%'

## **United States**

(builds on Olsen and Zabel, 2015 & Hilber and Turner, REStat, 2014)

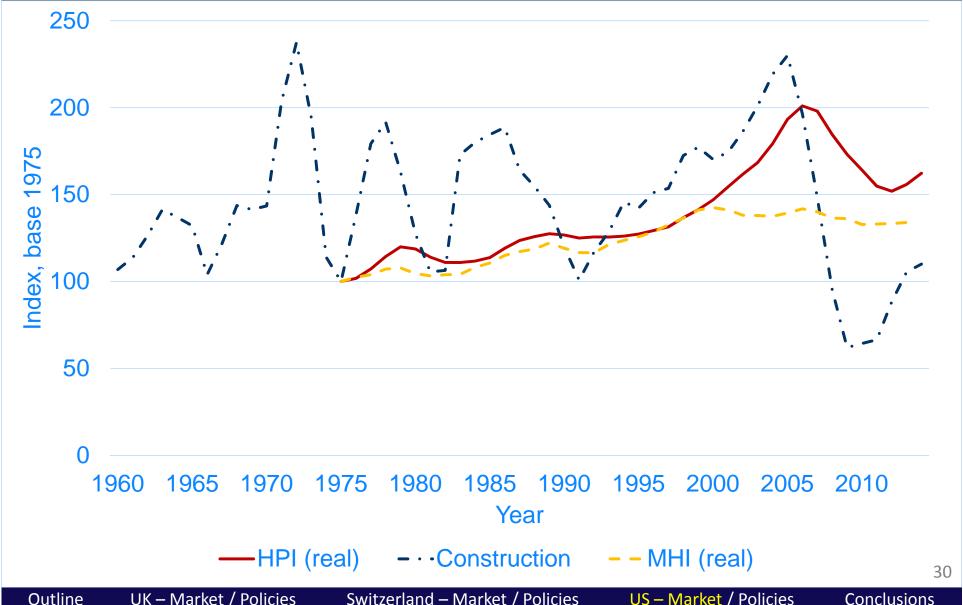


## Current status of US housing market

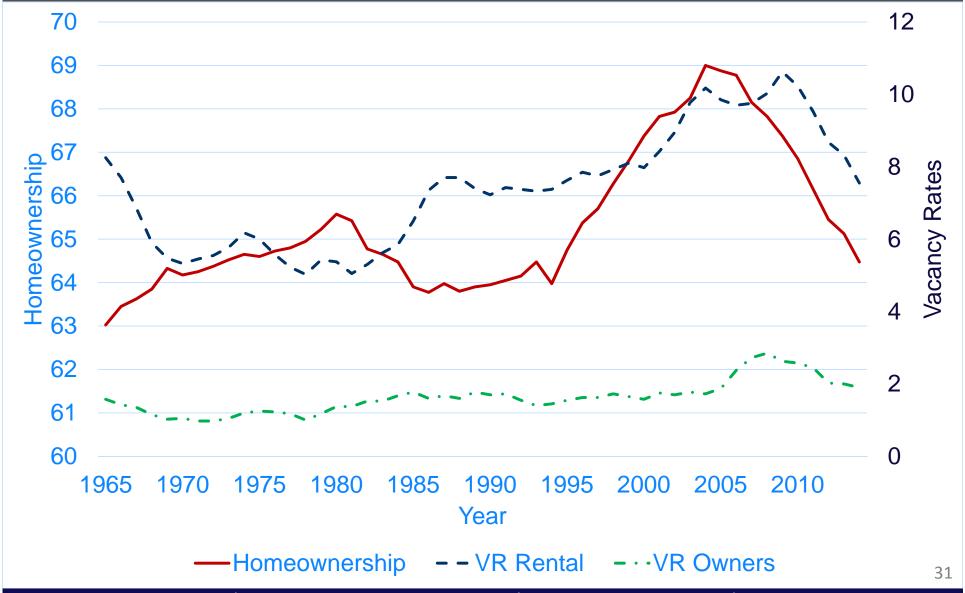
- US is a **country of homeowners** (64.5% owned in 2014)
  - But homeownership rate in decline since 2004 (69.0%)
- Property market(s) in US hit very badly by Great **Recession** and only just recovering
  - House prices decreased b/w 2006 & 2012, in real terms, by 24.4%
  - Construction decreased b/w 2004 & 2009 by 71.7%
  - Very severe foreclosure crisis (in part because mortgages typically non-recourse)

Switzerland – Market / Policies

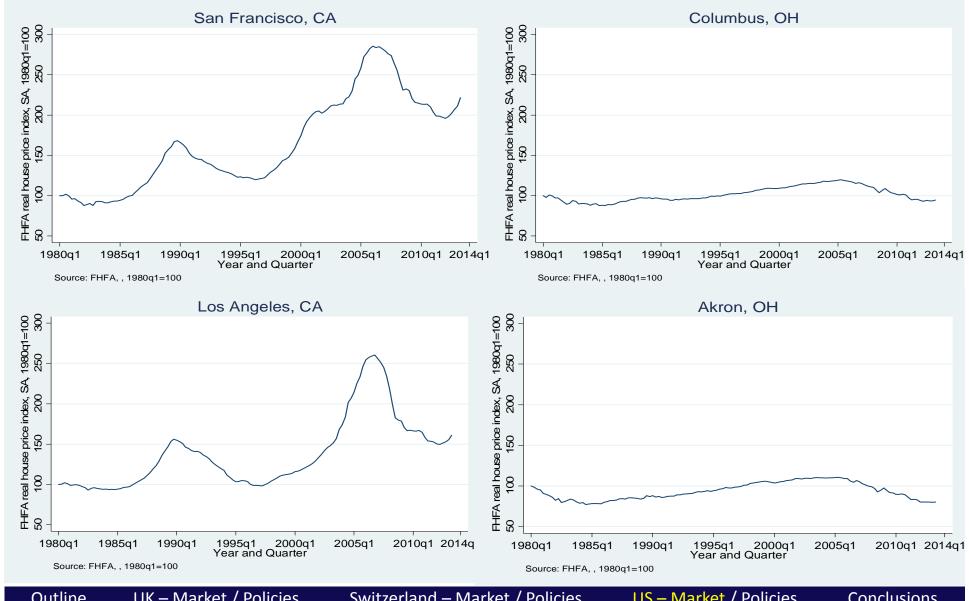
## Current status of US housing market in two graphs (1/2)



## Current status of US housing market in two graphs (2/2)



#### But huge variation across local markets (Real house price growth 1980-2014)



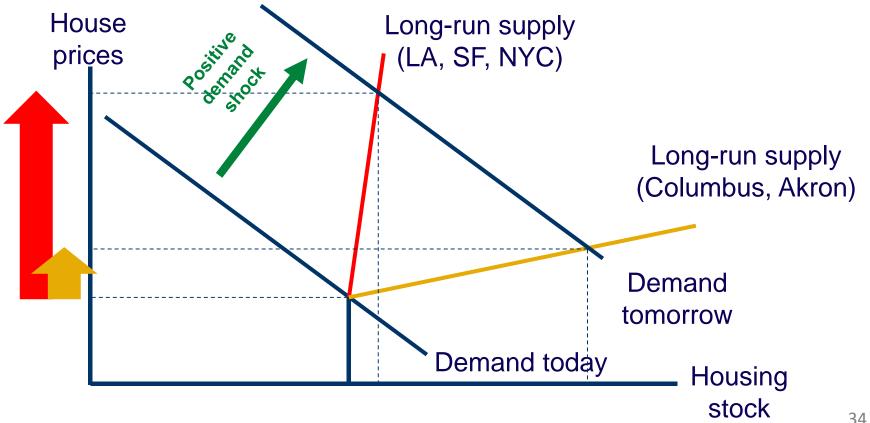
## Why the huge differences across space?

- Restrictiveness of land use controls and physical supply constraints vary enormously across US
  - Some cities have very strict land use controls and tight physical constraints (SF, LA, NY) – rather like UK
  - Other cities have lax controls and few geographical constraints (Columbus, Akron) – comparable to CH
- ⇒ Some place have very inelastic supply of housing, while others have very elastic supply...

UK – Market / Policies

## Implications for US housing markets

Housing supply curve becomes extremely inelastic, particularly in London & South East



#### US housing policies

- US housing policies focus on providing access to homeownership (+ currently: dealing with foreclosure crisis)
- Key long-term policy: Mortgage interest deduction

#### US: Mortgage Interest Deduction

(based on Hilber and Turner, 2014)

- MID: Subsidy to homeowners that varies by income
  - Introduced in 1986 (Tax Reform Act)
- Aim of policy: Increase homeownership attainment
- Cost of policy: ~\$100 billion per annum in foregone tax revenue
- Merits

Outline

In markets with flexible land use controls (Columbus, Akron) the MID does increase homeownership attainment

#### US: Mortgage Interest Deduction—Cont.

(based on Hilber and Turner, 2014)

#### **Demerits**

- Only increases homeownership attainment of higher income HHs in markets with flexible land use controls
- In markets with tight land use controls (LA, SF, NYC) the MID reduces homeownership attainment
- Net effect over entire US: essentially zero
- May lead to overconsumption of housing of existing homeowners
- Enormous cost of policy in form of foregone tax revenue

## Synthesis: A tale from three countries

- Main conclusion of analysis: Housing policies cannot and should not be judged in isolation from the institutional setting
- For example: Whether demand focused policies (such as Help-to-Buy or the MID) work depends crucially on nature of land use planning system
  - Demand-focused policies won't work in markets with tight planning restrictions and/or other severe supply constraints (UK, US-superstar cities)

UK – Market / Policies

## Synthesis-Cont.

- Policy makers should focus more on supply side and, in particular, on proper functioning of land use planning system
- The main role of land use planning system should be to correct market failure (provision of public goods; internalizing externalities)
- Demand-side policies should only be implemented if supply can respond sufficiently to price signals

Conclusions

#### Q & A

## Thank you!

Presentation with references & hyperlinks will be downloadable from:
<a href="http://personal.lse.ac.uk/hilber/">http://personal.lse.ac.uk/hilber/</a>

#### Presentation is based on

Hilber, C.A.L. and O. Schöni (2015) "Housing Policies in the United Kingdom, Switzerland and the United States: Lessons Learned", Paper prepared for ADB-ADBI Inception Workshop: Housing Policies for Emerging Asia, Tokyo, May 14-15, 2015.

*Note:* Data sources are provided in the paper.

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## Further Readings

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#### Further Readings—Cont.

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