

Creating Opportunities for Purpose-Built Rental Housing

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Acronyms:

- ACCs: Amenity Cost Charges
- ADU: Accessory Dwelling Unit
- CACs: Community Amenity Contributions
- CMAs: Census Metropolitan Area
- CMHC: Canada Mortgage and Housing Corporation
- DCCs: Development Cost Charges
- HAF: Housing Accelerator Fund
- HART: Housing Assessment Resource Tools
- HRC: Housing Research Collaborative
- OCP: Official Community Plan
- PBR: Purpose-Built Rental
- SSMUH: Small-Scale, Multi-Unit Housing
- TOD: Transit-Oriented Development

Executive Summary

In 2022, the Housing Research Collaborative (HRC) initiated a discussion with British Columbia-based developer Wesgroup about the overriding challenges inhibiting the development of multifamily housing in Metro Vancouver. To understand more about the unique challenges impeding multi-family development in Metro Vancouver, the HRC convened municipal leaders, provincial and federal government officials, housing providers, developers, and other stakeholders in a series of facilitated conversations. From these stakeholder discussions, it was determined that identifying and addressing barriers to purpose-built rental (PBR) developments is a critical area requiring more in-depth research. Working from this basis, this research project initially intended to address two goals:

- 1. To identify barriers to PBR development at the municipal level, and**
- 2. To explore potential solutions to improve and expedite the municipal approvals process.**

The project timeline spanned a period of major provincial and federal announcements related to housing policy and development which impacted the interviews and workshop discussion. As a result, a third project goal unfolded:

- 3. To consider the implications of recent government announcements for increasing PBR development.**

This project included three main research stages: (1) Thirty-one informal scoping interviews with stakeholders, completed by Rockandel & Associates; (2) Twelve directed, formal research interviews with Metro Vancouver housing stakeholders conducted by Kylie Clark, a WorkLearn student with the Housing Research Collaborative, and (3) A Housing Summit Workshop with eleven regional and provincial housing stakeholders. The research was also supported by a literature review describing municipal approvals processes (Akaabre, 2023b).



From both rounds of interviews, several barriers to developing PBR housing in Metro Vancouver were identified, including unfavorable financing structures and economic conditions, a lack of coordination and communication between government and housing sector organizations, operational capacity for developers, the loss of existing affordable rental housing, and difficulties adapting internal policies and frameworks to new provincial legislation. These barriers were distilled to three underlying challenges: (1) managing the transition from a reactive to a proactive planning process, (2) balancing standardized versus flexible approval processes, and (3) reducing the amount of municipal staff time spent on application review. These three challenge areas are interrelated, under the premise that enabling standardized approval processes for multi-family developments will create more certainty and time-saving efficiencies for municipal staff and developers alike.

Key opportunities, identified during the Housing Summit Workshop, include financial support for developers and local governments, incentives and innovative financing models, policy alignment on permitting, zoning and approvals, pre-zoning or as-of-right zoning (particularly on publicly-owned land), front-loading the planning process with regularly updated OCPs, implementing two-tiered standard or flexible development approvals contingent on project scale or type, frequent review of internal planning frameworks and policies, setting clear guidelines for proponents in advance, delegating approval authority, and incorporating digital tools and platforms into the approval process.

The three interviews and workshop culminated in three key insights that frame the overall context of PBR development in Metro Vancouver, and can be leveraged to unlock a more balanced supply of housing:

- 1. Government policies and frameworks intended to incentivize housing development should encourage a supportive financial ecosystem for PBR development.**
- 2. The ability of municipalities to move from reactive planning to proactive planning approaches is fundamentally linked to embracing standardized approval processes, which would simultaneously streamline development approvals and save municipal staff time.**
- 3. The complex roadblocks caused by high construction and land costs require correspondingly creative and far-reaching solutions that leverage publicly owned land, pre-approved designs, and construction supply-chain transformation.**



Overview of Purpose-Built Rental Housing in Metro Vancouver

The Metro Vancouver region comprises twenty-one municipalities and is home to over 2.6 million people, forming the third largest census metropolitan area in Canada. Out of the ten most populous census metropolitan areas (CMAs) in Canada, Metro Vancouver experienced the third largest change in population from 2016 to 2021, increasing 7.3%, and had the second highest population density, with 919 persons per square kilometer (Statistics Canada, 2022). About one in four households in Metro Vancouver are renters, and the median household income of renters was about 60% less than that of owner households (Metro Vancouver, 2023).

Although the proportion of renters varies by municipality in Metro Vancouver, the proportion of PBR housing remains relatively low. In the cities of Vancouver, Burnaby, and White Rock, around 55%, 39% and 35% of households are renters respectively, however only 19%, 11% and 13% of the total housing stock are PBRs (Metro Vancouver, 2023). Moreover, between 2016 and 2022 the City of Richmond experienced a decrease of 2% in the PBR inventory, while the number of renter households increased by almost a quarter (Metro Vancouver, 2023). Overall, the PBR housing market in Metro Vancouver has grown between 2022 to 2023, increasing “by 2.7%, mainly from new developments in the cities of Vancouver and Surrey” (Canada Mortgage and Housing Corporation, 2024b, p. 11; Metro Vancouver, 2023). Despite this growth, Metro Vancouver is still recovering from the fall in housing starts during the COVID-19 pandemic, which saw a 27% decrease between 2019 and 2020, impacting PBR more than any other type of housing development (Metro Vancouver, 2023).

Metro Vancouver has long been one of the most expensive and unaffordable housing markets in Canada. In the last two decades, “median rents in the region have more than doubled,” and in 2023, the average rent for a two-bedroom PBR unit was \$2,181 (Canada Mortgage and Housing Corporation, 2024b; Metro Vancouver, 2023, p. 3). Compared to the six major CMAs in Canada, Vancouver had the lowest vacancy rate in 2023 (0.9%) and remains Canada’s tightest major rental market (Canada Mortgage and Housing Corporation, 2024b). At the same time, existing renter households are facing challenges paying rent, with a 4.1% increase in arrears between 2022 to 2023, and the average rent of two-bedroom units increased by 8.6% between 2022 and 2023 (Canada Mortgage and Housing Corporation, 2024b). The median market rent for PBR housing in Metro Vancouver increased by 30% (\$362) between 2017 and 2022, with the most extreme increases in Port Coquitlam (88% or \$905), Maple Ridge (52% or \$450), and Port Moody (48% or \$623) (Metro Vancouver, 2023).

The general investment environment in British Columbia might also be considered less favourable and riskier for private developers taking on residential developments, compared to other provinces such as Alberta which has lower tax rates. For example, British Columbia’s provincial school tax and provincial sales tax (which applies to construction) creates additional costs for developers (Government of British Columbia, 2016; Hill & Eisen, 2023). In the 2023 calendar year, investment into residential construction in British Columbia fell 9.3%, compared to 1.7% in Alberta, 5.8% in Ontario, and 7.6% in Canada overall in the same period (Statistics Canada, 2024). The timelines for residential construction in Metro Vancouver are also extremely long, holding the second longest average construction time for apartment buildings out of the major CMAs in Canada. As of 2023, the average construction time for apartment buildings in Metro Vancouver was a little over 26 months, compared to about 33 months in Toronto, 23 months in Ottawa,

about 20 months in Montréal, 18 months in Calgary, and 16 months in Edmonton (Canada Mortgage and Housing Corporation, 2024c). These lengthy construction times can be attributed to sector-wide labour shortage and challenges in sourcing skilled labour, rising costs in materials, and larger, more complex projects (Canada Mortgage and Housing Corporation, 2024c).

Furthermore, other macroeconomic forces governing the cost of construction have huge impact on housing development; “strata title residential prices, single detached housing prices, and commercial property values” have all increased exorbitantly beyond the reach of new affordable housing development, and “caused residential land values to escalate rapidly” in Metro Vancouver, far exceeding the financial reach of rental developers (Coriolis Consulting Corp. & Wollenberg Munro Consulting Inc., 2019). As “less new housing is built, the more existing developable land is worth, and the more local governments can collect in fees or in-kind contributions from homebuilders,” that reduces the effectiveness of government initiatives to incentivize affordable housing construction (Government of British Columbia, 2021). In Vancouver, residential land sales volume amounted to \$1.6 billion in 2023 and “the price per acre [rose] 33% since 2020 to over \$4 million” (Colliers, 2024). “The viability of condominium projects was better in areas outside the City of Vancouver” and “lower land costs allow[ed] for completed units to be priced lower,” simultaneously mitigating risks for developers and increasing eligibility for conventional financing (Canada Mortgage and Housing Corporation, 2024c, p. 16).

Local government has a significant role in addressing the growing obstacles to building affordable rental housing: one of the most widely discussed barriers to the lack of affordable housing development (and housing development as a whole) in Metro Vancouver is the time-consuming, costly, and largely inefficient municipal approvals process that impedes timely, predictable PBR development (British Columbia Law Institute, 2022; Government of British Columbia, 2019, 2021; Renovate the Public Hearing, 2022a). The issue of lengthy and unpredictable development approvals is experienced by both not-for-profit and market developers, who face “uncertainty in the total amount of charges on a building project,” and “unpredictable Council decisions,” which both contribute to unnecessary delays and costs for financially limited rental developments (Akaabre, 2023a, p. 1). In 2022, the Municipal Land Use and Regulation Survey found that Metro Vancouver had the third highest approval delay index and the highest housing unaffordability index of major Canadian census metropolitan areas (Canada Mortgage and Housing Corporation, 2023b).

In Canada, all levels of government have introduced policies intended to ‘build more homes faster’ through financial or procedural incentives. Financial incentives can include waiving fees for developments, planning applications or building permits as well as waiving property taxes for non-market or rental housing. Procedural incentives can include expediting development approval processes or removing public consultation requirements to reduce project timelines. The Housing Accelerator Fund (HAF), introduced in 2023, is a financial incentive implemented at the federal level, which aimed to “provide incentive funding (contributions) to local governments to encourage local initiatives that remove barriers to housing supply” (Canada Mortgage and Housing Corporation, 2023a, p. 1). Eligible applicants were required to develop an action plan that “outline[s] supply growth targets and specific initiatives to grow housing supply and speed up housing approvals,” and “commit to a housing supply growth target,” and had to either “complete or update a housing needs assessment report” (Canada Mortgage and Housing Corporation, 2023a, p. 2). Notably, many of these programs are focused on increasing overall housing supply, not specifically PBR.

Project Scope

This project addressed the acute need for PBR housing stock and explored potential barriers to, and opportunities for, efficient and effective delivery of PBR housing in Metro Vancouver. During the project development and interviews, there were several provincial announcements of policy and legislative levers intended to improve the viability of PBR housing that have major implications for municipal approval processes (see *Figure 1*). *Figure 2* shows a more detailed overview of the government initiatives introduced at the federal and provincial level. Due to the timeline of interview data collection and workshop discussion, both the interviewees and interviewees were learning of provincial announcements in real time and did not necessarily have specific details as to the full extent of new legislation. For example, policy guidance for implementing Bill 44 was rolled out during mid-2024, resulting in the discussion around legislation on public hearings in the research interviews having different context than the Housing Summit Workshop and the analysis sections. Despite the dynamic policy environment, the research team and participants were able to identify several outstanding opportunities for successfully incentivizing PBR in Metro Vancouver.

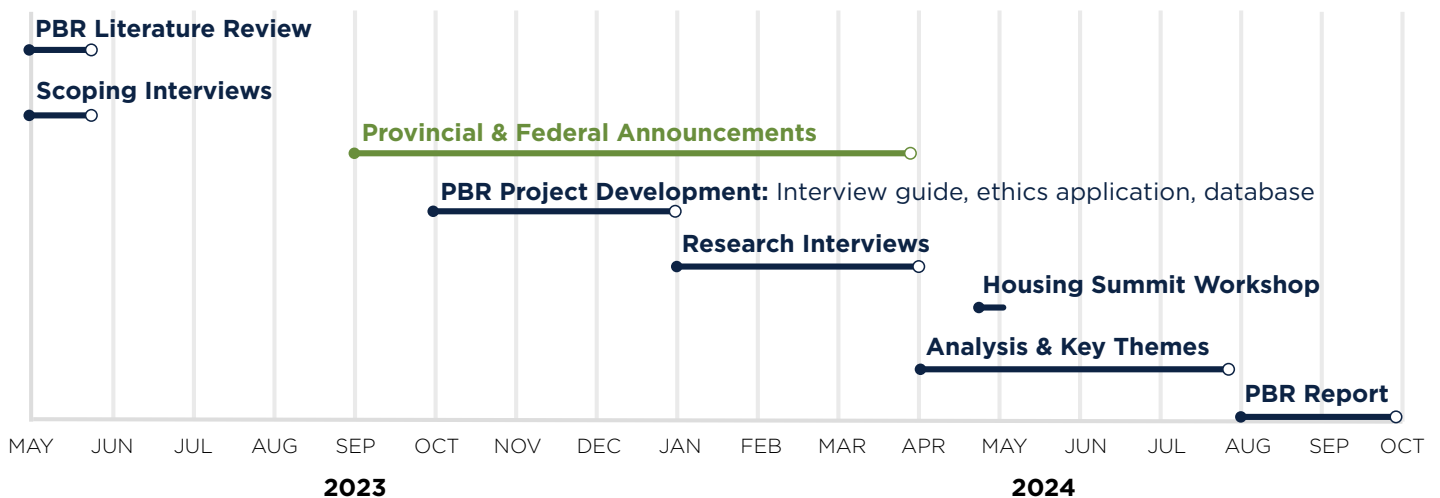


Figure 1. Timeline of the Purpose-Built Rental Project

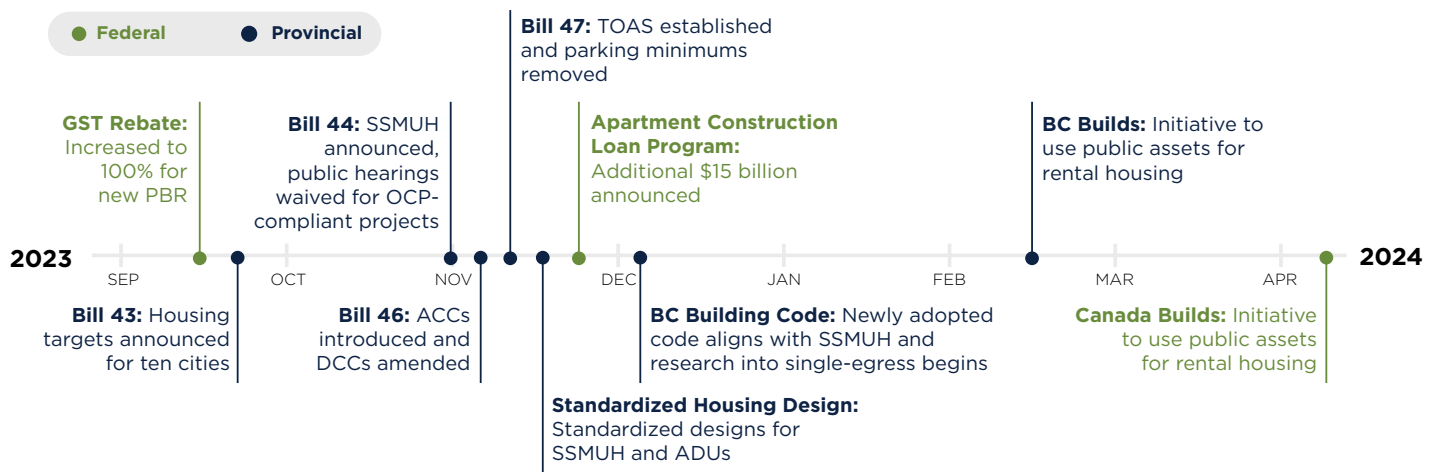


Figure 2. Timeline of major government initiatives during the purpose-built rental project

Methods

The research utilized three sources of qualitative data to address the project goals (see *Figure 3*):

1. **Thirty-one semi-structured scoping interviews** with a variety of housing sector stakeholders in British Columbia, representing municipal government, federal government, media, developers, non-profit housing providers, advocacy organizations, and financial institutions.
2. **Twelve formal research interviews** with stakeholders in the Metro Vancouver region, representing municipal government, developers, and academia.
3. **An in-person facilitated workshop** with eleven participants representing municipal governments, developers, non-profit organizations, and housing providers active in the Metro Vancouver region, and representatives from provincial government and for-profit or non-profit housing providers with provincial portfolios.

Scoping Interviews

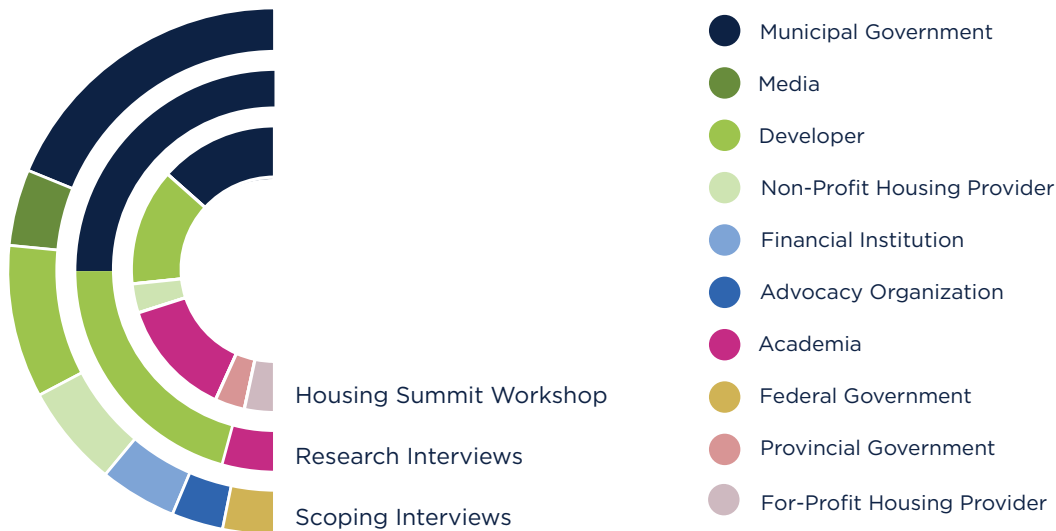


Figure 3. Interviewee and workshop participants.



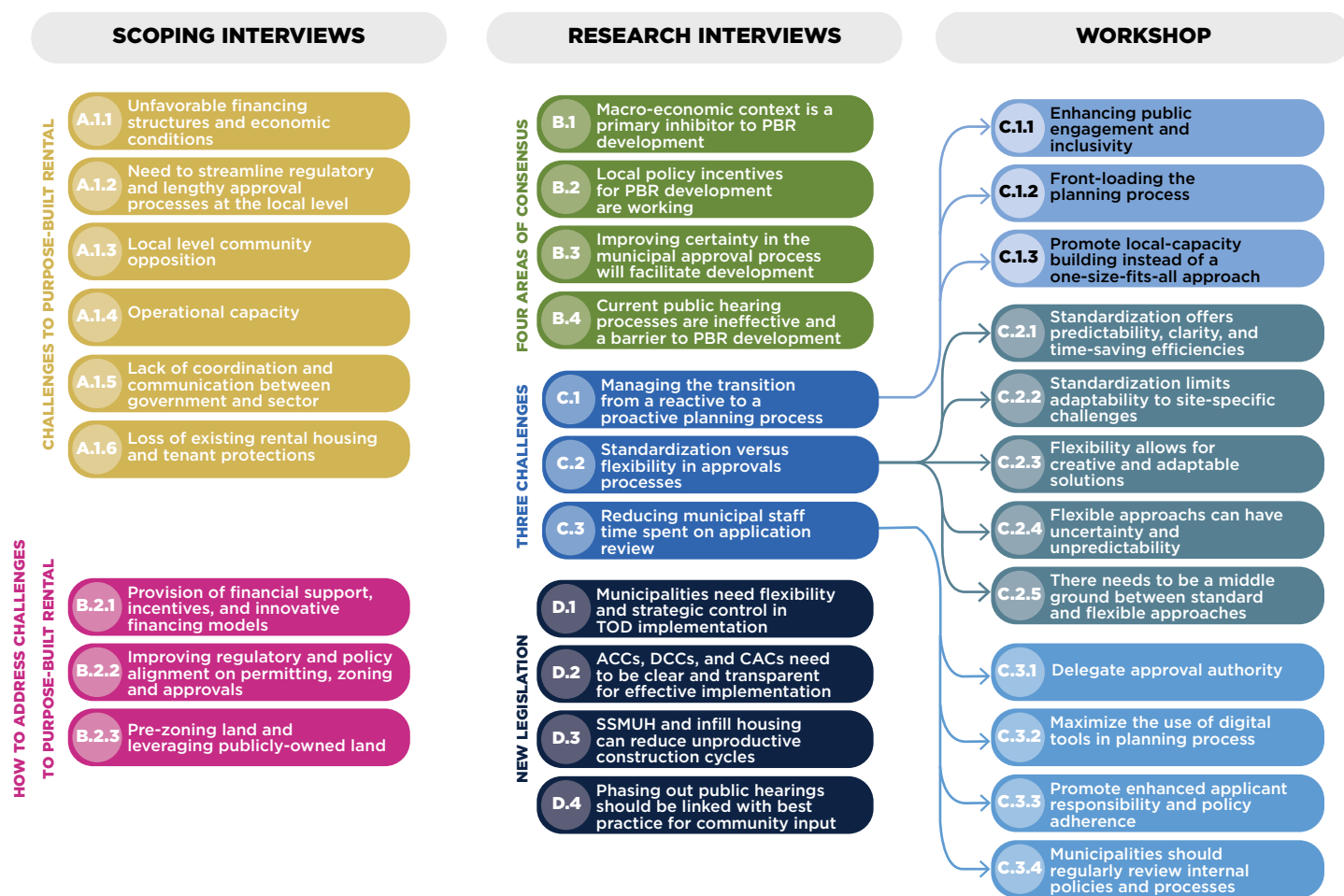


Figure 4. Findings from scoping interviews, research interviews, and Housing Summit workshop.

The semi-structured scoping interviews encompassed a broad set of questions intended to explore organizational interests and priorities related to PBR housing, to understand perceived barriers or challenges in achieving organizational outcomes related to PBR housing, and proposed solutions to overcome these barriers. The interviewees were selected to gather a diverse group of stakeholders all working at the municipal, provincial, and federal level to affect housing development in Metro Vancouver. The interviewee responses were then thematically coded within two broad categories (see *Figure 4*):

1. What are the challenges or barriers to developing PBR housing in Metro Vancouver?
2. How can we address these barriers or challenges to developing PBR housing in Metro Vancouver?

Despite some limitations due to the broad range of questions, the scoping interviews yielded valuable insights into organizational perspectives on barriers and opportunities for PBR housing. The preliminary scoping interviews found that the municipal approvals processes constitute a key factor in enabling or preventing delivery of PBR housing in Metro Vancouver, and currently lengthy approvals processes add costs to projects that are already difficult to finance. From this main finding and other insights, it was decided that a second round of formal research interviews would focus on municipal-level policies and the role of approval processes.

Research Interviews

The formal research interviews explored overall experiences in developing PBR housing, major barriers, and solutions towards improving the municipal approvals process, and potential approaches for more effective public engagement processes that would support efficient approvals. The interviewees were selected for their expertise in PBR development in Metro Vancouver. During this phase of the research, the Government of British Columbia and Government of Canada made several large announcements related to housing (as discussed in the Background) and therefore the research interviews also explored the impacts of recent legislation as they related to PBR housing. The research interviews were thematically coded to outline common insights and themes, that were then grouped into four areas of consensus, three challenge areas, and five key takeaways related to new provincial legislation (see *Figure 4*).

Housing Summit Workshop

The Housing Summit workshop brought together housing sector stakeholders to address the research interview findings related to the disconnect in approaches to the housing crisis in Metro Vancouver. More specifically, the workshop purpose was to create a systems-level picture of the delivery of rental housing and to identify existing gaps, with the overall goal of discussing solutions and policy recommendations to address those gaps. The discussion was framed according to the three main challenge areas from the research interviews, and the participant insights were thematically coded and analyzed within the three discussion areas (see *Figure 4*).

Finally, the coded findings from the three data sources were considered and analyzed collectively to understand overarching themes related to the barriers impacting PBR development at the municipal level, potential solutions to improve and expedite municipal-level processes, and the implications of recent provincial legislation for PBR development. This approach to analyzing the findings from the two rounds of interviews and workshops allowed for a more fulsome understanding of the barriers and opportunities to enabling PBR housing in Metro Vancouver.



Discussion

The following discussion points emerged from analysis of the two rounds of stakeholder interviews and the workshop. As the workshop was primarily guided by findings from the two rounds of research interviews, the findings directly related to the workshop's three challenge areas are described first. Additional findings that emerged from the two rounds of research interviews are also described, as the workshop scope primarily focused on where change could be made at the municipal level.

Local governments need to regularly review and streamline current municipal regulatory and approval processes

Barriers

Interviewees and workshop participants described how in most municipalities, current approvals processes do not distinguish between less complex, small-scale projects that already adhere to OCP requirements, and larger complex projects that would benefit from in-depth public engagement. This challenge has already been addressed in part by some municipalities in Metro Vancouver. For example, the City of Vancouver is “launching a new Residential Renovation Fast Track permitting stream for simple residential renovations under \$95,000” and the City of Burnaby has launched a new residential building permit process for single and two family dwellings, to process applications faster (City of Burnaby, 2024a; City of Vancouver, 2024e). However, municipal efforts to fast-track approvals for small-scale residential projects in Metro Vancouver are fairly recent and not widely taken up across the region. Therefore, in most municipalities, the majority of projects are still subject to potentially unnecessary discretionary reviews, negotiations, and layered-on requirements (e.g., sustainability studies, shadow studies) that add delays and unpredictability.

Interviewees and workshop participants described how lengthy timelines for application processing, unnecessary discretionary approval requirements, complex application requirements, a lack of information on application status, and conflicting requirements between adjacent local governments, all impact developers' ability to efficiently deliver affordable housing projects (Akaabre, 2023a, p. 2; Getting to Groundbreaking, 2014). Currently, municipal development applications and approvals processes are subject to various layers of regulations developed over time, each with their own internal logic and requirements. However, interviewees described how the combination of these regulations can impose overlapping and contradictory requirements on developers who must settle for trade-offs with municipalities according to objectives that take priority.



City of Surrey's Harmony – UNITI Affordable Housing

In July 2021, the Surrey City Council rejected a six-storey inclusive housing proposal that offered below-market rental housing, without giving clear reasoning for the decision (Azpiri & Singh, 2022). Some councillors cited the proposed building height, although six-storeys fell in line with the applicable area plan (Cheung, 2023). In December 2022, the same project was finally approved, although the project cost had risen from \$36.6 million to \$57.5 million (Cheung, 2023; City of Surrey, 2022).

During the municipal review processes, developers can receive mixed messages on financial or design requirements or discover that municipal staff and city council have misaligned priorities. For example, developers and operators may have challenges finalizing a housing agreement with municipalities because they are required to confirm rent rates that are very likely unknown until the latter stages of approval.

Furthermore, external review panels and advisory design boards are required for rezoning and development permit applications, regardless of housing type, and can often add significant costs and delays. Projects that are subject to council approvals also creates challenges “as agendas for council and board meetings are frequently full and applications may need to wait several weeks” (Government of British Columbia, 2019). Discretionary approval by elected officials may increase the potential for proposals to be rejected based on subjective decisions or superfluous details (see *City of Surrey’s Harmony – UNITI Affordable Housing*). These back-and-forth, sometimes contradictory communications regarding project requirements create inefficiencies for municipal staff and developers alike, and hinder time-sensitive affordable housing development.



City of Vancouver’s Development Process Redesign External Group



In 2020, the City of Vancouver formed the Development Process Redesign External Group (DPREG) that convened a group of expert advisors from the development and construction industry. The DPREG’s goals include developing “a framework for assessing projects at each key project stage, enhanced online material to inform on process and submission requirements, clear roles and responsibilities and escalation procedures, target timelines for advice from City staff” and to identify “inefficiencies with accompanying recommendations” (City of Vancouver, 2024d).

Opportunities

Interviewees and workshop participants identified several interventions that would enable a more streamlined, efficient and time-saving approvals process, including proactively reviewing and identifying problem areas in the approval process, the use of tiered flexible versus standardized approval approaches, digitizing specific steps or stages in development and permit approvals, delegating development permit approvals to staff or third-parties, providing more detailed information on requirements to developers upfront, and creating dedicated teams with specific focus on non-market rental approvals.

Regularly reviewing internal policies and processes

Interviewees described how successfully shifting from a reactive to a proactive planning process requires regular review of internal policies that guide approvals and permitting processes to identify conflicting or redundant requirements, or to incorporate recent technologies and strategies (Government of British Columbia, 2021). For example, municipalities and provincial government may be actively introducing multiple new policies with corresponding requirements, but there is no concerted effort to remove requirements. Workshop participants described how planners and municipal staff need to adapt their workflow, by proactively identifying roadblocks in the planning process and moving requirements between rezoning, development or building permit stages, so that municipalities can actively fast-track projects (see *City of Vancouver’s Development Process Redesign External Group*).



City of Burnaby's Preferential Processing Policy

The City of Burnaby introduced the Preferential Processing Policy in 1991, giving “priority to applications for affordable housing over other applications in the City approvals process in order to shorten the length of time required to obtain rezoning” (City of Burnaby, 1995). This expedited process is achieved through a team of municipal staff who meet with applicants to go over the proposal, project requirements and compatibility with municipal bylaws.

Implementing regular reviews and revisions of internal approval processes would also better inform municipalities of the potential for integrating standardized or flexible approaches to approvals. For example, standardized approval processes for small-scale projects using pre-approved designs, versus flexible approvals for large-scale projects. The workshop participants and interviewees discussed the benefits and challenges of implementing solely standardized or flexible approval processes, finding opportunities and limitations to both approaches. Most workshop participants and interviewees agreed that standardization offers predictability, clarity on commitments, and time-saving gains, thus making it easier to monitor progress and ensure clarity on requirements from developers and municipal actors. Standardized approaches also allow municipalities to establish and adhere to pre-approved, standardized charges for development. Interviewees and participants described how having a pre-determined procedure where public input is integrated through regular and structured OCP updates, results in lower likelihood of drawn-out negotiations. Some interviewees described how municipalities can adopt standardized application requirements for certain building forms, such as six-storey rental buildings. However, interviewees noted that enforcing overly comprehensive, fully standardized approval processes for all projects has less capacity to adapt to external factors or complex, large-scale projects that need more discerning review.

Flexible approval processes allow for adaptation to site-specific conditions and varying project requirements, and can encourage creative, unique design solutions that might otherwise be restricted by standardization. Flexible approvals can also better incorporate public input and adapt to market realities, with room for future changes and enabling projects with greater public benefit. Despite these benefits, interviewees discussed how flexible approaches can result in uncertainty or unpredictability in the approval process. For example, the current process for Amenity Cost Charges allows for them to be negotiated on a case-by-case basis, creating an opaque process where developers are not fully certain of the project's costs (Government of British Columbia, 2021). Flexible approval processes for non-market developments are also potentially slower and “expose projects to more political or legal opposition,” causing frustration for stakeholders, developers, and the community (Manville et al., 2023).



City of Vancouver's Social Housing or Rental Tenure (SHORT) Program

In 2017, the City of Vancouver launched the two-year SHORT pilot program that aimed “for faster production of affordable housing by reducing development approval times for high impact multi-family housing projects by nearly 50%” (City of Vancouver, 2024f). The SHORT Program enables qualifying project applicants to work with municipal staff “from initial enquiry though to issuance of development permit” and to “complete rezoning approvals in 28 weeks and development permits in 12 weeks” (City of Vancouver, 2024f).



City of Vancouver's Dedicated Multiplex Team

In November 2023, the City of Vancouver created a dedicated multiplex team, that supported processing over 170 applications since City Council introduced multiplex zoning changes (City of Vancouver, 2024a). This new system of approving multiplex projects has enabled permits to be issued in under six months, which is “faster than the current average for single detached and duplex permits” (City of Vancouver, 2024a, p. 3).

With these considerations in mind, interviewees and workshop participants identified the need to adopt a balanced methodology that combines the benefits of reliable standardized approaches, with the versatility of flexible approaches. Interviewees and participants described how a tiered or scaled approach based on project size or typology would save significant municipal staff time that can be reallocated towards discretionary review on complex, multi-phase projects. Expedited and more certain approvals based on project type or scale “can reduce carrying costs, help developers secure financing, and allow developers to bid more for land or budget for lower returns, all of which can help projects pencil and increase the supply of new housing overall” (Manville et al., 2023). Furthermore, some interviewees highlighted how developing standard approval processes for pre-approved designs across adjacent municipalities would address barriers in multiple municipal regulatory controls and lessen transactional work for developers by easing the learning curve for the development sector. An additional element that could be standardized are the secondary studies that proponents are required to submit, such as utility modelling for multiple developers or applications operating in the same area. Several interviewees also identified the potential of standardized application processes that distinguish between market and non-market development projects, or providing simplified, more user-friendly application processes for housing providers with low capacity.





Providing transparent guidelines and requirements for developers

Municipalities can further facilitate standardization in the applications and approval process, by improving predictability for developers and pre-emptively outlining transparent guidelines and requirements. If municipalities are able to provide clear project guidelines, establish clear (or reduce) urban design standards, outline zoning and amenity contributions upfront, and define flexible development incentives early, developers can accurately value projects without unexpected costs or uncertainty. Early provision of clear requirements would also ensure that affordable housing projects that are subject to standardized approval are held to rigorous standards that do not compromise planning integrity.



Government of Ontario's Bill 108 and Government of Alberta's Bill 48



In 2019 and 2020 respectively, the Governments of Ontario and Alberta passed legislation that imposed limits or caps on development approval timelines (Akaabre, 2023b, p. 9; More Homes, More Choice Act, 2019, SO 2019, c 9, 2019; Red Tape Reduction Implementation Act, 2020 (No. 2), SA 2020, c 39, 2020). In Alberta, application completeness needed to be finalized within twenty days, subdivision applications within sixty days, and development permit applications within forty days (Akaabre, 2023b, p. 9).

Creating specialized teams to review projects

Municipalities can further fast-track affordable housing projects by reorganizing or creating specialized planning teams and pre-emptively reviewing project proposals (see *City of Burnaby's Preferential Processing Policy*; *City of Vancouver's Social Housing or Rental Tenure (SHORT) Program* and *City of Vancouver's Dedicated Multiplex Team*). Municipalities can also set clear and enforceable deadlines for stages of the approval process, with penalties for delays, to encourage adherence to timelines (see *Government of Ontario's Bill 108 and Government of Alberta's Bill 48*) (Government of British Columbia, 2019). These actions would increase the responsibility of proponents to commit to applicable municipal requirements before submission. Additionally, with the front-loading of public engagement commitments and project requirements, developers would have more capacity and incentive to put forth complete, high-quality projects without needing to overcome unclear requirements and negotiated CACs. These efforts would not only create a more predictable process where applications that are consistent to OCPs and requirements are approved faster and with minimal discretion, but also help municipalities reach their PBR and affordability goals (Manville et al., 2023).



California's Objective Design Standards

The State of California's Objective Design Standards “involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion” (CA Govt Code § 65913.4, 2023). These standards “implement streamlined and ministerial review processes for qualifying projects” and “establish an objective framework by which a qualifying project will be evaluated” (Town of Los Gatos, 2022).

Furthermore, delegating development permit approvals to staff or accredited third-party reviewers, rather than approval by elected officials, would save time in the overall approval process. Delegating approvals is dependent on the adoption of robust OCPs and area plans so that “the approval of any development application that aligns with these plans (OCPs) could be delegated to local government staff” (Akaabre, 2023a, p. 4). This risk-based review process would allow staff or certified third parties to review low-risk projects according to OCPs, area plans or objective design standards (see *California's Objective Design Standards*) (Housing Industry Association, 2021). During the review of existing regulatory and approval processes, municipalities can create an approach for those development approvals that align with OCPs to be delegated by default, “with the option to opt into elected official decision-making” (see *City of Fernie's Delegation Bylaw*) (Government of British Columbia, 2019). These efforts to free up municipal staff time from routine planning approvals or delegated tasks can also allow for increased staff capacity at the policy planning stage, furthering proactive planning. Third-party review processes are also already in use for building code compliance in some Metro Vancouver municipalities (see *City of Vancouver and City of Burnaby's Certified Professional (CP) Program*).



City of Fernie's Delegation Bylaw

The City of Fernie's Delegation Bylaw “gives staff the authority to approve a specific set of minor variances,” defined as “setbacks greater than or equal to 1.5 metres from property line, building / structure height up to 10% over allowable height in the Zoning Bylaw, parcel coverage up to 10% over allowable parcel coverage in the Zoning bylaw” and “all projections into the required setback” (City of Fernie, 2022). The Delegation Bylaw is intended to reduce staff time spent on applications and reduce wait times for permits (City of Fernie, 2022).

Integrating digital tools

Finally, interviewees and workshop participants described how integration of digital tools at specific stages of the development application and approval process would save municipal staff time in addressing cursory compliance checks. Digitizing the building code would create more transparency for proponents, especially those with less experience in developing affordable housing. Participants noted how integrating software or digital tools to check standardized or simple projects could save municipal staff time. Digital intake and initial review of applications would also act as a gatekeeping mechanism to ensure that only fully complete applications enter the review process. For example, the City of Vancouver has introduced the

Project Requirement Exploration Tool (PRET) that allows users to digitally explore the requirements and regulations for laneway homes in R1-1 zones, with clear description of costs, timelines, and feasibility (City of Vancouver, 2024e). The City of Vancouver has also introduced eComply, that allows users to “upload and review drawings and designs, and receive feedback on areas that are incomplete, missing, or opposite to regulations” (City of Vancouver, 2024e). By digitizing the process of drawing intake, municipalities can reduce the potential of resubmissions and using staff resources to check for minor errors, as well as provide immediate transparency on compliant applications (see *Bill 44, “Housing Statutes (Residential Development) Amendment Act*).



City of Vancouver and City of Burnaby’s Certified Professional (CP) Program

In 1978, the City of Vancouver introduced the Certified Professional (CP) Program, recognizing that design professionals were over-reliant on City staff for complete verification of project compliance, and instead creating opportunity for “certified professionals to take on the full review and inspection role on behalf of the City” (City of Vancouver, 2023b, 2024b). Similarly, the City of Burnaby’s CP Program allows “qualified private sector professionals who are hired by the developer to supplement City staff review” (City of Burnaby, 2023b).

The role of community engagement and public participation in the approval process needs to be re-evaluated

Barriers

A large part of the interviewee and participant discussion related to improving municipal approvals process focused on the role of community engagement and public participation within the overall framework for delivering affordable housing. Community engagement collected through public hearings (based on provincial legislation at the time of interviews) can be adversarial and become venues for community opposition to affordable housing projects, thereby delaying or outright rejecting affordable housing or PBR projects, to the detriment of the broader community. This challenge is not unique to Metro Vancouver as community consultations, and the corresponding staff time needed for preparing public engagements, can create large delays in other major Canadian municipalities (Elliott, 2024).

Participants and interviewees agreed that the prior legislation governing public hearings was too open-ended and broad, leaving room for municipalities to waive or conduct public hearings at will. Court rulings on public hearings also created an additional layer of complexity setting precedents and impacting elements of public hearings: disclosure of documents to the public prior to public hearings impartiality of the decision-maker (i.e., the local government); and the requirement for post-hearing reports from local government staff (British Columbia Law Institute, 2022). Furthermore, public hearings can be waived for rezoning applications that are already consistent with the established OCP, yet many local governments choose to keep the public hearing regardless, creating inconsistencies and variation in how public hearings are enacted (Government of British Columbia, 2019).



Bill 44, “Housing Statutes (Residential Development)” Amendment Act

With the introduction of Bill 44, the provincial government phased out requirements to hold a public hearing “if a proposed zoning bylaw is consistent with the” OCP already in effect, thereby placing more weight on the strength of the OCP engagement process (Government of British Columbia, 2024d). However, local governments are still required to publish a notice in situations when public hearings are not required for proposed zoning bylaws.

Most interviewees and participants agreed that public hearings risk becoming a venue for recurring negative public opinion that can impede projects that are compliant with applicable area plans or are intended to develop non-market housing. Participants in public hearings may also repeat arguments or concerns that were already raised and addressed in Official Community Plan (OCP) or area plan engagement. The main concerns of those who are opposed to PBR housing, or higher density residential projects are often focused on location, stigma around the intended users or residents, construction noise, and “concerns about traffic congestion, parking shortages, and changes to neighborhood character” (Akaabre, 2023b, p. 10). These short-term or sometimes ill-intentioned concerns add unnecessary barriers or costs to a project, and often result in rental development occurring in neighbourhoods where rental housing already exists, away from major arterials or majority single-family home neighbourhoods.

Most interviewees and participants found that the public hearing format itself is long overdue for a re-evaluation and potential replacement. The format of public hearings often attract a homogenous demographic that can skew the input and negatively impact the progress of social and affordable housing project, discriminating against certain demographics and restricting engagement from community members who are very much affected by the project outcomes, but unable to participate due to inconvenient meeting times, in-person requirements, unwillingness to publicly share personal information, or inexperience with the public hearing forum. Furthermore, the form of public hearings is not necessarily conducive to productive and meaningful discussion as the city council and staff may not respond to comments from the public, that can cause frustration for the community (Akaabre, 2023a). Similarly, British Columbia’s public hearing requirements mean that the public hearing can occur too late in the development process and does not allow for meaningful input. On the whole, interviewees and participants considered that the legislation governing public hearings is too broad, there are many accessibility barriers impeding participation of a varied demographic, the format of public hearings is not conducive to meaningful or useful discussion, and public hearings tend to attract or over-emphasize the concerns of well-organized interest groups who oppose social and affordable rental projects at the expense of community members who cannot participate or who would benefit from affordable housing (Government of British Columbia, 2019; Renovate the Public Hearing, 2022b). The public hearing process (at the time of interviews) gave opportunity for public opposition to high-density or rental housing projects, that in turn delayed and blocked OCP or area plan-compliant projects. For these reasons, the format of public hearings and their role in the development process are not an effective mechanism to convene community input meaningfully or productively for developers or the municipality.

Opportunities

The mechanisms for collecting public input and determining when input is collected during the municipal approval processes, need to be reassessed so that public input does not obstruct affordable housing development. However, removing opportunities for public input entirely would go against democratic principles, and several interviewees stressed that community engagement at the OCP stage should be leveraged to strengthen projects and resolve concerns earlier in the planning process.

Phasing out public hearings and providing guidance for early engagement

Interviewees and participants described how Bill 44's attempts to address existing issues by proactively front-loading engagement to the OCP stages and would result in most sites falling within the OCP so that more projects move through approvals faster. Some participants also noted that Bill 44 provides municipalities with legislative cover for justification of specific goals or outcomes related to public engagement, by deferring to provincial decision-making. However, interviewees and participants strongly emphasized the fact that the new legislation still leaves room for potential challenges in successful and effective implementation. Specifically, Bill 44 assumes that local governments are updating OCPs regularly and rigorously to capture meaningful public engagement, and still requires municipalities to give notice of zoning bylaw amendments even when public hearings are not taking place which can be potentially misleading for the public. There are also potential challenges in the applicability of new regulations for zoning and project types, that may lead to less meaningful public engagement, perpetuate existing concerns around public hearing processes, and does not necessarily translate to effective community consultation.

Furthermore, Bill 44 lacks guidance on early engagement requirements for local governments, which can leave municipal staff struggling to adjust to new legislation while simultaneously needing to manage public expectations on engagement for existing high-density projects. Fast-tracking or removing public hearings is not necessarily a determinant for improving project quality since meaningful community input is a crucial factor for working within the existing urban fabric. Interviewees and participants found that Bill 44 has too much room for interpretation or variability in how municipalities give notice and engage with the community, and the provincial oversight in requirements on collecting public input may result in potential lack of buy-in for OCPs. Successful implementation hinges on developing comprehensive and transparent community plans upfront, so that future development can follow these guidelines without continuous spot rezoning and site-by-site hearings. To this end, interviewees and participants found that there is crucial need for balance and policy refinement in this area, and that municipalities need guidance or best practice for early public engagement in OCPs and area plans. There is ample opportunity for the province to provide this guidance and guarantee that municipalities commit to gathering meaningful, early community input and reduce potentially adversarial processes. This would also empower municipal staff and council to proceed with their work efficiently. For example, clarifying terminology such as high-rise or mid-rise housing, that can have different definitions or perceptions for various stakeholders. By establishing community expectations early, municipalities can anticipate and plan for community needs, amenities, and infrastructure, that then guide development application approvals. This would also support the transition from a reactive to proactive planning process, by positively impacting how municipal staff time and resources are allocated.

Requirements around collecting public input can also be subjective based on project scale. The workshop participants described how there is a role for site-by-site rezoning in larger, complex sites, but there is no need for embarking on the time-consuming process of rezoning and public hearings for known or standard projects or developments. Restricting public input to large-scale master-planned projects while relying on OCP engagement for small-scale standardized projects can shift resources and focus on more complex developments. For these large-scale projects, municipalities can encourage more accountability and trust-building by requiring developers to engage communities earlier and report on how feedback was incorporated.

Informing the public

Several interviewees noted how re-evaluating the format of public hearings includes the need to enhance public education with accessible and understandable information, so that well-informed and nuanced public engagement can be collected and leveraged by developers. For example, informing participants of the multiple subsidies needed to develop an affordable housing project and ensure affordability over time would emphasize the complex logistics underpinning a small-scale project. By increasing public education and transparency of the project context, development requirements or process prior to community engagement, the resulting public input would be more constructive and impactful to the overall project.

Providing multiple engagement options

Moreover, successful proactive planning would require municipalities to provide multiple engagement tools for the public, citing the City of Burnaby's efforts in providing virtual and in-person engagement options for the 2050 Official Community Plan, via social media, digital notices, and pop-up events in different neighbourhoods (City of Burnaby, 2023a). By offering a variety of more inclusive and accessible public engagement formats (e.g., virtual, and in-person forums, more scheduling options), municipalities can broaden how engagement occurs, encourage diverse participation and more effectively frame the project proposal (Renovate the Public Hearing, 2022b). Virtual engagement options have opened the opportunities for participants who were previously excluded and reduced tensions that are often present in public hearings. Additional actions include targeted engagement for disadvantaged groups and potential new residents alongside the current neighbourhood community. Altogether, front-ending public engagement through inclusive and well-informed community consultation would give legitimacy to future housing projects and ensure that they can be approved efficiently and in alignment with already adopted, robust, OCPs.



Municipalities need to address the high cost of land and exclusionary zoning

Barriers

Interviewees described how delays caused by rezoning applications for affordable housing projects are linked to the fact that existing zoning regulations are restrictive to high density and rental development projects in Metro Vancouver municipalities. This results in multiple individual affordable housing projects requiring their own rezoning application (spot rezoning) and corresponding lengthy public hearing engagement, that creates a time-consuming, bureaucratic process. Restrictive zoning also results in most new rental development being limited to areas of already existing rental housing. In the City of Vancouver, the target timeline for a rezoning application is approximately fifteen months (City of Vancouver, 2023c). In the City of Burnaby, the application processing time for a standard rezoning application can take up to six months, between twelve and twenty-four months for a comprehensive development rezoning application, and between two to three years for a master plan comprehensive development zoning (City of Burnaby, 2024b). Some participants noted how years-long rezoning processes, along with lengthy development permit and building permit application timelines, can result in project outcomes that miss the mark on what the market now requires.

Provincial action on Transit-Oriented Development (TOD) Areas is theoretically intended to reduce spot rezoning and promote proactive planning, by requiring municipalities to up-zone for twenty years of projected growth. However, several interviewees noted concern that this tool may continue to limit PBR growth development. Some municipalities may already meet these zoning capacities and therefore will see little immediate change from the legislation. In addition, blanket density legislation can be difficult for municipalities to implement without having room for local flexibility. For example, flexibility around allocating density based on additional benefits for higher density in specific areas, and ensuring density incentives are aligned with local priorities. Furthermore, the new legislation can be considered strict on height requirements and density thresholds that hinders the potential for municipalities to strategically stagger development and infrastructure investment. While the provincial density targets are an important initiative to reinforce the need for housing development, municipalities would benefit from having flexibility to meet said targets according to local geographic context, priorities, and infrastructural constraints. For example, up-zoning areas around transit stations without sufficient services or infrastructure, when



Cambie Corridor Plan

In January 2010, the City of Vancouver adopted the Cambie Corridor Planning Principles and the Interim Rezoning Policy as part of a massive initiative to integrate development with the Canada Line transit planning. The Interim Rezoning Policy was intended to “inform development applications adjacent to existing Canada Line stations along the Cambie Corridor,” so that multiple similar applications could be reviewed simultaneously as the Cambie Corridor Planning Program was being completed (City of Vancouver, 2009). Along with this large-scale rezoning effort, the City implemented “an approach to CACs based on a target CAC rate” resulting in “pre-set contributions for 93% of the sites identified for change” (City of Vancouver, 2018). In 2023, City Council again approved zoning changes within the Cambie Corridor Planning Program, to simplify “the development process of constructing a townhouse or rowhouse without a rezoning” (City of Vancouver, 2024g).

municipalities already have limited financial resources to invest in new infrastructure.

Interviewees also identified the cost of land as a huge barrier to the financial viability of social and affordable housing projects in Vancouver. Extremely high land costs render procurement of land more difficult for rental developers, particularly acquiring land that is already appropriately zoned for the housing project proposal (Akaabre, 2023b, p. 7; Metro Vancouver, 2024). “As land cost rises, the break-even rents are only affordable to high income households,” and developers face serious challenges in delivering affordable housing “even with free land, without some way to offset or reduce cost” (Coriolis Consulting Corp. & Wollenberg Munro Consulting Inc., 2019). Although the federal government has created programs intended to provide public land for affordable housing, “surplus government land has often languished, left underused or even vacant, while trapped in a time-consuming approval process” (Anderssen et al., 2024). Open and accessible information accurately describing public land assets is also difficult to obtain, “hidden behind paywalls, poor record-keeping and bureaucracy, making it impossible to consider them as a collective resource” (Anderssen et al., 2024).

Opportunities

Interviewees highlighted an overall need for a more unified vision when discussing land use and affordable housing, so that these assets are not developed in siloes or are subject to multiple isolated policy interventions. Opportunities to maximize land use include strategic pre-zoning of specific neighbourhoods (preferably low-density neighbourhoods or areas near transit) to reduce land speculation, and by leveraging public land assets through long-term leases or providing to developers at significantly reduced cost (Anderssen et al., 2024).

As-of-right zoning

Interviewees described how implementing pre-zoning or as-of-right zoning would allow for streamlining various stages of the development process and massively speed up approval times. However, interviewees acknowledged that pre-zoning or as-of-right zoning requires robust and upfront engagement to be codified in OCPs and area plans and reduces opportunities for negotiated incentives such as Community Amenity Contributions (CACs). Municipalities rely heavily on CACs for funding infrastructure and amenities, and if development approvals were to move towards prioritizing PBRs, then municipal capacity to fund necessary infrastructure with existing revenue sources will likely be impacted. PBR housing can be exempt from





Victory Houses and National Housing Act Amendments



Historically, the federal government undertook initiatives to use publicly owned land for affordable housing. In the 1940's the federal government purchased and leased land to develop Victory Houses, that were intended as rental housing for returning Veterans from the Second World War, and later for homeownership (Housing Assessment Resource Tools, 2023). Most Victory Houses were prefabricated one-and-a-half storey homes, and the large-scale growth hugely shaped the evolution of Canadian suburbs (Government of Canada, 2019). The National Housing Act was amended in 1964 to introduce "legislation that provided for the transfer of loans of up to 90% of the cost to the provinces for the construction of provincially owned public housing," and again in 1973, to provide "financial assistance for new home-buying, loans for co-operative housing, and low-interest loans of up to 100% of a project's value for municipal and private non-profit housing" (Begin, 1999).

CACs since these projects are already financially constrained. For example, in 2017 the City of Vancouver exempted 100%-rental projects from CACs in certain neighbourhoods (Akaabre, 2023b, p. 6). Therefore, existing and future provincial efforts intending to encourage municipalities towards pre-zoning need to occur in tandem with clear, upfront CACs so that municipalities have a transition period to address potential financial gaps for infrastructure without unnecessarily delaying projects (see *Cambie Corridor Plan*). CACs impede project viability by adding costs, and it is important for municipalities and the province to monitor CACs performance over time and update requirements as needed.

Along with clear OCPs and area plans that include community goals and priorities, interviewees identified how municipal governments can take the initiative and rezone or by up-zone land to allow higher-density projects as-of-right and reduce redundant site-by-site rezoning (Akaabre, 2023a, p. 3). Enabling as-of-right zoning together with provision of publicly owned land for developers, is especially relevant if developers have limited financial resources to acquire suitably zoned land for affordable housing. Interviewees also noted that the legislation on TOD Areas needs to be aligned with regional growth plans for adjacent municipalities to ensure a unified regional vision, and the importance of local governments and the provincial government to monitor and assess the implementation of PBR housing in TOD Areas and adapt requirements as needed.



Using government-owned land

Interviewees identified the possibility of leveraging suitably zoned government-owned land for affordable housing. The Housing Assessment Resource Tools (HART) project's Land Assessment Tool identifies and assesses government-owned land in major Canadian cities according to social inclusion proximity services and amenities, finding over 500 hectares of well-located vacant and occupied land in the Greater Toronto and Hamilton Area (GTHA) (Housing Assessment Resource Tools, 2024). "Lands owned by local and regional entities could be made available for sale or lease on the open market for urban development," and land that is made available for affordable housing at little to no cost would forgo "the initial revenue from sale in favour of longer term returns from leasing" (Coriolis Consulting Corp. & Wollenberg Munro Consulting Inc., 2019). The use of public land for affordable housing has already been established in Canada (see *Victory Houses and National Housing Act Amendments*). In 2019, the federal government introduced the Federal Lands Initiative (FLI) that identified federally owned properties to make available to municipalities or other stakeholders for housing development, however the FLI has been critiqued as proponents had "challenges related to obtaining information about the program, including details about available lands" and challenges to stack or integrate FLI with other federal programs (Canada. Parliament. House of Commons. Standing Committee on Human Resources, 2022). More recently, the use of existing public land for affordable housing has been clearly outlined as a federal and provincial priority, with the Canada Builds and BC Builds programs that intend to use public land for affordable housing. These programs offer huge opportunities for municipalities to maximize public land for affordable housing by proactively pre-zoning land for non-market housing and creating a streamlined development and approval process for projects. Critically, provision of public land is not the only pre-requisite for creating affordable housing, as "developers and non-profit groups say they will still need low-cost loans, and other financial relief" and "public land may require work to become shovel ready," potentially with "an upgrade of city services before housing can be built" (Anderssen et al., 2024). Both the Canada Builds and BC Builds programs address this by providing low-cost loans to developers and aim to speed up project approval timelines. The effectiveness of the FLI and similar government initiatives to leverage public land could be improved by adopting several governing principles, including: prioritizing creation of non-market housing through free leased land, waived fees and taxes; utilizing long-term lease covenants to maintain affordability; prioritizing larger land assemblies to achieve scale; and improving zoning and approval processes to support development on public land (Housing Assessment Resource Tools, 2023).



Uncoordinated communication between government levels and sector organizations is prohibiting effective development of purpose-built rental housing

Barriers

Currently, there is a lack of alignment and communication between all levels of government, as evidenced by the lack of coordination between funding program requirements and multiple definitions of affordability for developers and municipalities to adhere to (Government of British Columbia, 2021). “For example, environmental and accessibility requirements to obtain provincial funding for a non-profit housing project may conflict with requirements to obtain federal funding,” while federal or provincial funding “may require municipal zoning bylaws to change to accommodate a project” (Government of British Columbia, 2021). Some workshop participants noted that this lack of coordination between government levels most affects social and affordable housing providers, who must navigate multiple overlapping and contradictory requirements.

There is also a clear challenge of alignment and communication between multiple orders of government, as interviewees and participants voiced concerns around municipal capacity in adapting to new provincial legislation. Municipal staff are transitioning to new legislation by creating new positions and adjusting existing workflow, all while processing current applications. Interviewees noted how this transitional period of adapting to large procedural changes may result in a temporary slowdown, especially if staff need to be reallocated or expertise is needed on multiple overlapping projects. Interviewees described how the current environment in which municipalities and development sector organizations are reacting to provincial and federal legislative changes in real-time, impacting the capacity of municipal staff and council to continue processing existing approvals. In this siloed environment, various levels of government are attempting to make progress on housing creation, albeit without communicating with each other on strategic directions, timelines, or policy levers. Misalignment or miscommunication between different levels of government can lead to discrepancies in policies, timelines, and funding mechanisms. This further complicating the development process for municipal staff and developers alike and places an additional burden on municipalities to conform with multiple new announcements using the same or decreased budgets.

Several interviewees noted a need for early consultation between municipalities and the province to ensure that legislation intended to support housing development is not creating additional barriers. Several interviewees cited Bill 47’s introduction of TOD Areas and corresponding up-zoning requirements for municipalities and described how implementing TOD legislation requires some degree of municipal flexibility in strategic control, with respect to municipal planning processes, density placement and geographic constraints or limitations. The provincial requirements around TOD and the realities of high-density affordable housing construction also raised concerns around building height. Interviewees described how the relationship between zoning for rental housing and minimum density targets needs to be carefully balanced, as the ability to meet rental affordability targets decreases with higher construction costs associated with high-density development. Interviewees cited how PBR housing is often more financially feasible in mid-rise buildings between four to six storeys, and that the provincial focus on high-rise, transit-oriented densification may not lend itself to affordable rental development. However, Bill 47 outlines the minimum allowable heights for TOD areas to be up to eight storeys within 800 metres of a Skytrain or Canada Line station, a building height that tends to lean towards the more expensive concrete form development (Coriolis Consulting Corp. & Wollenberg Munro Consulting Inc., 2019; Government of British Columbia, 2024a).

Opportunities

The provincial policy action around incentivizing housing development, particularly affordable housing development, is a positive sign of government priorities. However, interviewees identified an overall need for all levels of government to align strategies, policies and funding mechanisms and the associated requirements or criteria, to create a cohesive and supportive environment for PBR development. Improved communication and coordination between different levels of government will also improve the ability of municipalities to work with developers. For example, establishing or expanding existing forums for municipalities to convene and share questions or best practice in delivering affordable housing or in implementing provincial legislation. Finally, efforts to improve communication and coordination between local government and the provincial government should be matched with regular, transparent monitoring and evaluation of housing policies or programs, to inform future areas for improvement.



Apartment Construction Loan Program

In November 2023, the federal government renamed the Rental Construction Financing Initiative (RCFI) to the Apartment Construction Loan Program, and provided an additional \$15 billion in new loan funding (Canada Mortgage and Housing Corporation, 2023e). The Apartment Construction Loan Program provides “loans ranging from \$1,000,000 up to 100% of the cost of the residential component,” at a 10-year term and a fixed-interest rate, with up to a 50-year amortization period for eligible borrowers (Canada Mortgage and Housing Corporation, 2023e). Eligible borrowers must ensure that “(1) At least 20% of units must have rents below 30% of the median total income of all families for the area and the total residential rental income must be at least 10% below its gross achievable residential income,” or “(2) The proposal has been approved under another affordable housing program or initiative from any level of government, such as capital grants, municipal concessions or expedited planning processing” (Canada Mortgage and Housing Corporation, 2023e).

Large-scale macroeconomic conditions and financial viability are the underlying factors prohibiting purpose-built rental development

Barriers

The interviewees and workshop participants agreed that financial factors comprise a key barrier inhibiting not only PBR development but housing development as a whole, in Metro Vancouver. Interviewees and participants considered the high cost of land and construction to be large impediments, especially when developers are already facing unfavorable financing conditions, labour shortages, and volatile interest rates (Bula, 2023; Hogue & Battaglia, 2023; Immen, 2022; Metro Vancouver, 2024; Younglai, 2023). The interviewees and participants found that the cumulative costs of land, construction, and strict financing conditions or development taxes, notwithstanding the financial costs of approval delays, all worsen project affordability and make the overall business case for PBR housing more difficult to justify (Canada Mortgage and Housing Corporation, 2023d).

Developers generally tend to approach residential projects with the intention of obtaining highest or best use in project value, meaning the development project with highest profit or financial return. Developers may not find the same financial reward in delivering PBR housing because there are limited or insufficient incentives for the former (Canada Mortgage and Housing Corporation, 2021). PBR projects are no longer feasible with conventional debt financing,” and “small developers with more debt are likely to pause or reduce future projects” (Canada Mortgage and Housing Corporation, 2024c, p. 9). Many interviewees cited how developers often cannot obtain financing from traditional lenders without proof of specific project profit margins, that can be difficult to reach when considering additional costs of development incurred. For example, a developer may need to reach a specific return on cost to secure financing, however additional government charges can double the developers’ required return, notwithstanding additional costs of community consultation and back and forth approvals. Furthermore, PBR projects also often involve multiple partners or stakeholders all layering in additional subsidies, that in turn slows the project timelines down significantly and results in complicated proformas (Akaabre, 2023b, p. 4). As such, interviewees considered Metro Vancouver’s financial environment to be unfavorable for purpose-built affordable rental and found that there is more incentive for market rental or ownership development because developers can recover costs and profit faster.

Several interviewees described how changing market realities have reduced the impact of government policies aimed at encouraging PBR development, thereby making rental proforma for large-scale multi-unit rental housing more challenging and less financially profitable. For example, municipal policies introducing density bonuses, that “allows increased development potential as long as affordable housing is included” initially had positive uptake by developers, who could pay for additional density with cash or provision of amenities (BC Housing, 2017, p. 7). However, extenuating market evolutions over time meant that developers found decreased benefit value in providing affordable housing amenities compared to just paying the cash contribution. Consequently, municipalities had to adjust density bonus incentives according to changes in market conditions, to maintain developer interest in contributing towards amenities and affordable housing. For example, the City of Vancouver implements an annual inflationary rate adjustment to density bonus contributions that provides predictability and certainty to developers and industry stakeholders (City of Vancouver, 2024c).



Señákw Development

The Señákw housing development is often cited as a successful partnership for affordable housing led by Indigenous Nations, with “the Squamish Nation, Nch'káy Development Corporation (the Squamish Nation's economic development arm), and Westbank — under the partnership name Nch'káy West” (Westbank Projects Corp., 2024). The project is supported by the City of Vancouver, through the City of Vancouver-Squamish Nation Señákw Service Agreement that ensures provision of infrastructural services and amenities to the area and is the largest “First Nations economic development project in Canadian history” (Nch'káy Corporation, 2022).

Government charges on new development include taxes, warranty fees, municipal fees, development charges, density payments, and permit fees, and “can represent more than 20% of the cost of building a home in major Canadian cities” (Canada Mortgage and Housing Corporation, 2022b, p. 3). The number of government charges levied in Metro Vancouver averaged between seven to nine, with an average dollar amount of \$70 per square foot for all dwelling types (Canada Mortgage and Housing Corporation, 2022b). These taxes and levies imposed by multiple levels of government create financial hurdles for the overall project costs, that then complicate development and increases risk. Developers also face additional costs from complex approval processes, changing municipal priorities and a myriad of requirements that seemingly overrule the primary goal of providing affordable housing. As a result, many interviewees and participants described how PBR projects are very often not feasible without fee exemptions, free or low-cost land, having additional density layered in, and complex multi-stakeholder partnerships (St. Denis, 2021). For example, at the time of scoping interviews, several participants identified the 5% goods and services tax (GST) on land value and construction costs as a challenge, due to the lack of transparency and uncertainty in terms of when it is charged, and how it is assessed. At the time, GST taxation was a major issue for rental development “since tenants aren't obligated to pay the 5% GST on top of their regular rent,” and rental developers were obligated to pay taxation costs on the total cost of buildings up-front and receive a slower rate of return (Battaglia, 2023). Since the time of the scoping interviews, the federal government announced a tax relief for new rental housing developments and introduced legislation to remove GST from new PBR housing.



Señákw housing development in Vancouver, is an Indigenous-led project partnership that will provide over 6,000 rental homes in Vancouver, as shown here.

Other government fees or levies include Development Cost Charges (DCCs), Community Amenity Contributions (CACs) and Amenity Cost Charges (ACCs). With Bill 46, the provincial government made amendments to existing governance around DCCs and introduced ACCs as a new financial tool intended to standardize amenity cost charges negotiation and provide more certainty for developers. DCCs and Development Cost Levies (DCLs) allow municipalities to collect monies “from new residential and non-residential developments to fund the infrastructure needed to provide services to the future occupants of these buildings” (Akaabre, 2023b, p. 8). However, many interviewees acknowledged that local governments may experience a transitional period with short-term losses or delays as they update and develop amenity plans or future infrastructure planning according to provincial legislation. Interviewees described how municipalities often plan to pay for infrastructure and services through DCCs and ACCs, and therefore pre-zoning efforts may limit the areas where certain types of development to which DCCs and ACCs are applicable. Furthermore, “while DCCs provide a funding tool for the expansion of certain services in growing communities, they do not provide funding for maintaining and replacing infrastructure,” thereby increasing the reliance of municipalities on CACs (Government of British Columbia, 2019). Interviewees described that the lack of provincial guidance in the interim may lead to future infrastructural deficits if municipalities do not have clarity as to what ACCs are intended to cover (e.g., water, sewage, waste, transportation, or highway infrastructure) or information on the negotiation process and expectations.



San Francisco’s Housing Accelerator Fund

The City of San Francisco launched the Housing Accelerator Fund in 2017, “with a goal to fund the preservation and construction of 1,500 units over five years, focusing on projects that wouldn’t be possible without [the City’s] fast flexible financing” (San Francisco Housing Accelerator Fund, 2024). The Fund serves as a “one-stop-shop that streamlines financing so affordable housing providers can acquire land and buildings” and “invest at the speed of the market” (San Francisco Housing Accelerator Fund, 2024).

Opportunities

The current cost of new construction is so high that almost any form of financial leverage that would help developers reduce their project costs would provide much-needed relief. There are several financial incentives that can be implemented, in combination with a re-evaluation of existing financial structures across all levels of government, that would enhance the economic viability of PBR projects. Interviewees noted that government financial incentives need to ensure that proponents are incentivized to undertake affordable housing projects without significant profit loss or financial risk. It is also critical that accessible financial support comes from all levels of government so that developers may reach fixed affordability requirements when financing social and affordable rental housing. As the cost of choosing additional density or affordable housing has incrementally increased, government policies need to evolve with market conditions to maintain a balance between incentivizing developers and ensuring that policy goals are met. Interviewees suggested several financial policy changes or incentives include providing support with infrastructure funding; providing tax credits; changing affordability criteria; low-cost financing and interest rates tax incentives and subsidies; encouraging social impact investing; reducing or removing city-wide minimum parking requirements; and transparent monitoring on incentive effectiveness.



In 1991, CMHC created the Canadian Centre for Public-Private Partnerships in Housing (CCPPPH) “aimed at fostering public/private cooperation in housing projects” (Canada Mortgage and Housing Corporation, 2014). The CCPPPH provided “a number of tools to assist in developing affordable housing, including ‘best practices’ guides, partnership research, expert advice, new business leads, interest-free Proposal Development (PDF) loans, and facilitating access to mortgage insurance” (Canada Mortgage and Housing Corporation, 2000).

Financing structures and partnerships

It is crucial for government funding programs intended to incentivize affordable housing development, to be structured in a way that does not unintentionally create additional hurdles for developers or municipalities to access financing. For example, funding programs that have less requirements on social outcome targets may be more appealing to private developers, who then have fewer targets to meet on top of ensuring and maintaining ongoing affordability (see *Apartment Construction Loan Program*). Interviewees also described opportunities for municipal government to support financing models, agreements, or partnerships. For example, affordability covenants would protect rental rates over the long-term to ensure that developers or operators maintain affordability in perpetuity. Interviewees identified examples of funding frameworks that encourage multi-sectoral partnerships, such as bridge financing to meet funding gaps for multi-stakeholder partnerships or non-profit developers who have limited revenue sources (see *San Francisco's Housing Accelerator Fund*). Bridge financing would especially support projects that need pre-construction financing, particularly when “most government funding can only be accessed at construction start or later” and “non-profit developers do not have access to a pool of monies that can bridge this period” (Witoszkin, 2020, p. 14). Some interviewees also suggested providing tax credits or adjustments for PBR housing, such as rebates that reduce operational costs for rental properties. For example, the Province offers PBR exemptions from the 2% property transfer tax and the general property transfer tax, intended to encourage construction of new PBR buildings (Government of British Columbia, 2024b).

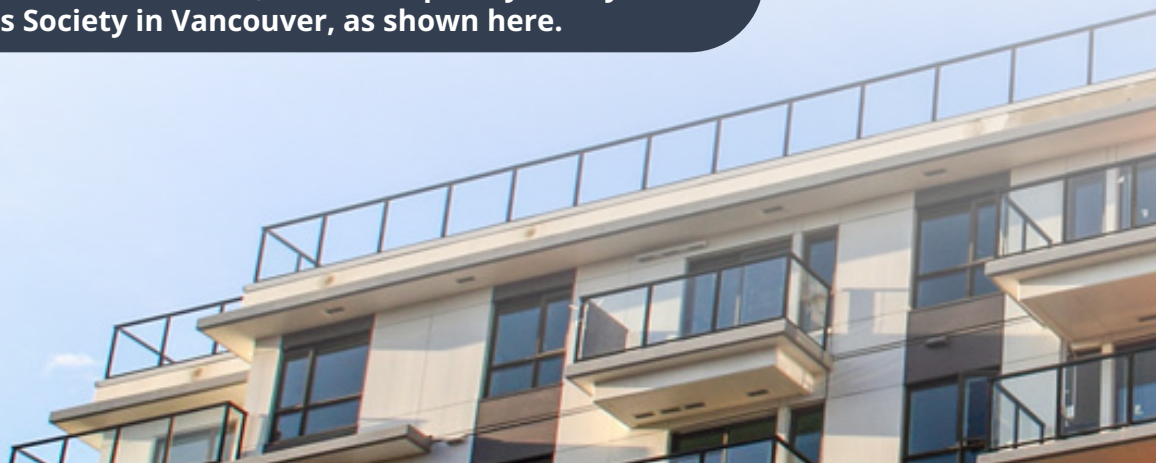
Some examples of partnerships that can enable affordable housing delivery include public-private partnerships or partnerships led by Indigenous Nations (see *Señákw Development*). Public-private partnerships are “an effective mechanism for the public sector to procure public assets and services,” allow stakeholders to mitigate and transfer risk associated with developing affordable housing and can empower non-profit housing organizations and serve as a model to subsidize housing costs (The World Bank, 2020). Actions to foster public-private partnerships include: leadership from centralized provincial or national organizations to bring together public and private organizations; making available business processes more flexible; increasing availability of financial information; and monitoring public-private partnerships (see *CMHC's Canadian Centre for Public-Private Partnerships in Housing*) (Housing Research Collaborative, 2019).

Some interviewees described other models of encouraging private-public partnerships, such as social impact investing or social impact bonds, that leverage partnerships between public and private organizations. Social impact investing makes private capital available to non-profit and social enterprise organizations, who may have limited capacity to scale due to “multiplication of efforts, inefficiency, challenges in sharing resources,” and “a wide variation in financial literacy, development expertise, and access to land and capital necessary to undertake a project” (May, 2018, p. 17; Phillips & Johnson, 2021). This financial model is more flexible than public capital for affordable housing, and can move at the speed of the market, while allowing for lower rates over the long-term (May, 2018). Social Impact Bonds (SIBs) can be used to deliver affordable housing without relying on changeable government budgets or program requirements, because they “finance immediate program delivery with the long-term savings that accrue from program outcomes” (Ecotrust Canada, 2014, p. 3). In 2017, the City of Vancouver acknowledged “the opportunities to grow social impact and social purpose in the private sector,” and passed a motion in 2021 to develop a framework for leveraging and nurturing a social impact investment community, recognizing the limited amount of available funding to deliver affordable housing (City of Vancouver, 2017, 2021).

Aligning or stacking multiple funding sources

There is an overall need for government incentives for PBR development to better align with municipal ability to finance amenities and infrastructure required for housing. In response to recent provincial changes to DCCs and ACCs, municipalities need to balance housing approvals with providing corresponding infrastructure, that in turn needs provincial and federal financial support. For example, the aggregated DCCs or DCLs “contribute to increased cost of new development, including” PBR and therefore affordable housing projects may benefit from “a complete waiver of DCCs/DCLs” (Akaabre, 2023b, p. 5). The interviewees recommended that local governments undertake a broad review of the cumulative impact of government fees and taxes on PBR development. These insights would better enable understanding of the excessive costs borne by developers that inhibit viable projects and need to support infrastructure costs. If the provincial government were to “implement a cap on the amount development charges could cumulatively increase in a calendar year,” this would give developers more certainty and encourage municipalities to phase in DCC or DCL changes (Akaabre, 2023b, p. 8). Provincial government and local governments can also work together towards “exploring alternate tools for municipalities to raise revenue to fund municipal services and capital projects,” to lessen reliance on DCCs and ACCs, that themselves may inhibit PBR housing creation (Canada Mortgage and Housing Corporation, 2022b; Metro Vancouver, 2024).

The Rental Construction Financing Initiative has supported construction of affordable rental projects across Canada, such as Aspen by Catalyst Community Developments Society in Vancouver, as shown here.



Removing parking minimum requirements

Another key financial factor that adds unnecessary costs to projects, are parking minimum requirements, which require developers to set allocate significant spending to guarantee development of underground or street parking (Metro Vancouver, 2024). In addition, calculating and reviewing whether applications meet parking requirements according to the zoning, land use or project types takes a huge amount of time in the application and approval process (City of Vancouver, 2023a). Interviewees described how municipalities could take steps to reduce or eliminate city-wide minimum parking requirement, which would likely increase the “number of projects that are financially attractive,” as well as reduce construction costs and enable more financially viable non-market rental projects (City of Vancouver, 2023a, p. 2). In 2020, the City of Edmonton removed city-wide parking minimums, followed by the City of Toronto in 2021, and the Cities of Montreal and Vancouver in 2024 (City of Vancouver, 2023a; Little, 2024). In Bill 47, the Government of British Columbia introduced policy guidance for fifty-two TOD Areas in sixteen municipalities (Government of British Columbia, 2024c). This policy guidance requires that local governments remove restrictive parking minimums for off-street residential parking spaces, and instead provide on a needs-based, case-by-case situation.

Integrating open-source tools and information

Some interviewees also identified the potential for leveraging open-source tools that are integrated with regional or municipal agreements on affordable rental targets, or existing local-level financial incentives. These tools would support private and non-profit developers to assess rental proforma feasibility according to realistic local conditions, increase transparency in financing housing development, and allow users to explore various affordable project types (Inclusionary Housing, 2019).

Monitoring financing performance

Finally, some interviewees described the need for more transparency on how public subsidies and incentives are used by private developers or landlords to enable tracking and monitoring of these programs over time. Regular evaluation of funding incentives and programs would enable municipalities and the Province to adjust program criteria or incentives to increase eligibility and deliver affordable housing more effectively.



Housing providers, developers and the construction sector need support to build capacity in order to meet housing need

Barriers

Both non-profit and private providers and developers may lack capacity, resources, and the full scope of guidelines and information necessary to put forth fulsome project applications that would deliver PBR housing. Non-profit developers may struggle to fulfill municipal process requirements, have limited capacity to take on costs associated with development negotiation, or to navigate the information and requirements needed to apply for available federal government funding. The development sector as a whole would benefit from receiving more communication and support on income-testing, standard definitions of tenant eligibility, and managing and tracking incomes for below-market rental housing from BC Housing, municipalities, and CMHC.

Currently, the construction sector is struggling with labour supply issues and increasing cost of construction, with labour productivity in the construction sector falling behind labour productivity in all other sectors over the last decade (Canada Mortgage and Housing Corporation, 2024d). This labour shortage “is particularly acute in B.C., with a job vacancy rate well above the national rate for the construction industry” (Canada Mortgage and Housing Corporation, 2024a). The “retirement of the baby-boomer cohort” and “decreased enrollment in trades training programs” are creating massive challenges for a construction and development sector that are facing increased demand for specialized housing construction from all orders of government (Canada Mortgage and Housing Corporation, 2024d). This in turn aggravates already delayed construction timelines “at all stages of construction, including project launches, starts and completions” (Canada Mortgage and Housing Corporation, 2024c). Some interviewees had concern around new legislation incentivizing SSMUH, because of the perceived lack of professional developers in this space



Kelowna's Infill Design Challenge offers pre-approved designs that can be fast-tracked for approval, as shown here.



City of Kelowna's Infill Design Challenge & Infill Fast-Track

In 2016, the City of Kelowna created the Infill Challenge, “an innovative competition to identify new designs for infill housing in parts of Kelowna’s urban core,” and resulted in “a unique 4 dwelling housing zone called RU7” that has since been replaced by MF1 – Infill Housing Zone (City of Kelowna, 2021). These pre-approved designs are then moved into the Infill Fast-Track process, that “is a specialized development approval process intended to expedite the necessary approvals for infill housing,” by combining the development and building permitting stages to ten days, as opposed to two to four months (City of Kelowna, 2022).

and need for municipalities to support less experienced builders in specialized infill housing, through the application process. Furthermore, the ability of small-scale construction organizations to build multiple low-rise housing developments at the same time is more challenging due to “greater logistical constraints of moving labour material and equipment among structures” compared to developing apartment building (Canada Mortgage and Housing Corporation, 2022a). Therefore, municipalities may need to dedicate more resources towards supporting less experienced builders, providers, and developers, diverting resources away from high-density developments. In these situations, standardized or digitized application processes would support developers and municipal staff alike, by reducing reliance on staff time.

The capacity to address these barriers is especially challenging as municipalities adjust to new provincial and federal legislation, contending with changeable requirements or guidelines. Developers and municipalities must balance putting forth and processing new housing project applications against the time and cost to upgrade municipal infrastructure needed to support new development.



Opportunities

As all orders of government continue to take measures towards increasing the supply of affordable housing that emphasize the role of housing providers and developers, it is necessary to provide commensurate support to the development and construction sectors to increase their capacity to respond to increased demand generated by government initiatives.

Bill 44 is intended to encourage infill of missing middle housing and bolster the housing supply. However, interviewees described how specialized missing middle housing requires that the development and construction sectors already be prepared with the experience to build increasingly complex residential projects. For small- or large-scale housing providers and developers intending to deliver SSMUH housing, municipalities should provide support by proactively creating resources and dedicated teams to guide less-experienced developers through the review and approvals process. This may include working directly with developers and architects to create pre-approved SSMUH housing that aligns with applicable zoning and by-laws so that proponents can initiate a missing middle housing project with full confidence that it will be approved (see *City of Kelowna's Infill Design Challenge & Infill Fast-Track*).

The construction sector requires significant support from all levels of government to increase the supply-side capacity and encourage productivity. CMHC's Housing Accelerator Fund is a testament to this, with the goal of driving transformational change on land use planning and development approvals by directly addressing opportunities to transform the housing production chain (Canada Mortgage and Housing Corporation, 2024g). Regulation is one of the most significant barriers to increasing construction sector capacity to deliver housing, and governments can address supply-side labour shortages in the construction sector through "traditional levers such as direct investment, fiscal incentives, and targeted policies (aimed at specific domains such as higher education and R&D)" (Canada Mortgage and Housing Corporation, 2024d, 2024f). For example, incentivizing more participation in the construction and trades sector through "financial support for learning skilled trades and enhanced vocational training facilities across Canada" (Canada Mortgage and Housing Corporation, 2022a, p. 9). With targeted actions to provide technical knowledge and directly support small-scale developers in increasing productivity, local governments can consolidate resources and work towards achieving economies of scale in the development and construction sectors.

Conclusions

1. Government policies and frameworks intended to incentivize housing development should encourage a supportive financial ecosystem for purpose-built rental development.

Currently, developers and municipal staff are facing a myriad of funding programs, each with overlapping or conflicting requirements, definitions of affordability, and pre-requisites that constrain the efficient and timely delivery of affordable housing in Metro Vancouver. Financing, or a lack thereof, ultimately becomes the deciding factor for developers who are proposing affordable rental housing projects if they cannot guarantee profit margins or maintain affordability within the specifications set out by traditional lenders. The current financial climate discourages private and non-profit developers from pursuing affordable rental projects, as “higher interest rates, construction costs and development fees [have] put the financial feasibility of numerous planned rental projects to the test” (Canada Mortgage and Housing Corporation, 2023d). Funding programs with affordability, sustainability, accessibility, and social benefit requirements place additional, often insurmountable costs on developers, resulting in limited ability to deliver affordable housing. There is an immediate need to align different financial incentives and programs that are intended to support housing development within the larger framework of housing as a human right. Without substantial and prompt action from all levels of government to create certainty in this sphere, proponents will continue to be limited in their ability to initiate affordable housing projects, and sorely needed rental housing construction will not get built.

2. The ability for municipalities to transition from a reactive to a proactive planning process is inherently linked to the adoption of tiered standardized or flexible approval processes that would create time-saving efficiencies for staff at multiple points in the approval process and reallocate time towards proactive planning policies.

Interviewees and workshop participants agreed that flexible approval processes can lead to creative solutions for public benefit and offer adaptability to respond to site-specific contexts. Conversely, some benefits of flexible approval processes can be achieved in standardized approaches, granted that site constraints and concerns are addressed in the area planning process. Participants agreed that opaque, flexible processes can have too much uncertainty and is not a scalable method or able



to effectively meet the demand for PBR housing in Metro Vancouver, due to existing staff capacity challenges. As a result, participants found that adopting flexible approaches for larger, complex masterplan projects is more appropriate, and implementing pre-approved designs that are integrated into standardized approval processes allows for good-quality affordable housing products without requiring the same amount of municipal staff time. Workshop participants indicated that adopting standardized approval processes requires room for a review process, through regular checkpoints with other stakeholders and the development community. The use of tiered standardized or flexible approval processes according to project type and eligibility requires municipalities to take measures towards proactive planning (such as pre-zoning or as-of-right zoning, robust OCP engagement). By taking concerted measures in shifting towards proactive planning, both municipalities and developers would have more certainty in the overall development planning and approval system and mitigate the risks of starting a new project.

3. The complex, interrelated barriers of high construction costs and high costs of land require commensurate creative solutions towards the creation of purpose-built rental housing.

The prohibitive costs of construction and supply-side issues, “including high material and financing costs, the complexity of larger projects and labour shortages” have all prolonged construction timelines and worsened vacancy rates for non-market rental housing, while overly prescriptive land regulation influences the development and use of land for affordable housing (Canada Mortgage and Housing Corporation, 2023b, 2024e). The complexities in overcoming construction costs and obtaining affordable, suitably zoned land for non-market housing development requires interventions from all sides aimed at improving the processes behind financing, construction, and development. For example, governments should create the conditions for construction supply-chain transformation, including leveraging automation, pre-approved designs for missing middle, infill housing, and enabling mass-manufacturing to relieve labour shortages in Metro Vancouver, and increase productivity in the construction and development sectors (Canada Mortgage and Housing Corporation, 2023c). Concurrently, governments should identify and make available publicly owned land that is suitably zoned for affordable housing, at little to no-cost to developers, so that excess costs for construction, government fees, and land can be redistributed towards ensuring and maintaining affordable housing units.

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