



Housing Assessment
Resource Tools
(HART)

Mid-Way Evaluation for the Housing Assessment Resource Tools (HART) Project

March 2023

University of British Columbia
Principal Investigator: Prof. Alexandra Flynn
Contact : Craig E Jones, Project Coordinator
jones@allard.ubc.ca
Peter A. Allard School of Law
University of British Columbia
Allard Hall, 1822 E Mall, Vancouver, BC V6T 1Z1

Table of Contents

1. INTRODUCTION	3
1.1 Purpose of the Evaluation	4
1.2 Summary of Key Findings	4
2. EVALUATION BASELINE	7
2.1 How well were Housing Needs Assessments and Land Assessments working to inform housing policy?	8
2.2 What did respondents need to know?	8
2.3 What were the gaps?	8
3. EVALUATION FINDINGS	9
3.1 Housing Needs Assessments	10
3.2 Land Assessments	16
3.3 Acquisitions	19
3.4 How HART tools are being used	24
3.5 Future Needs	28
3.6 Advisory Committee Themes	32
4. CONCLUSIONS AND RECOMMENDATIONS	35
5. APPENDICES	38
6. REFERENCES	41

List of Acronyms and Abbreviations:

AHMA	Aboriginal Housing Management Association	GTHA	Greater Toronto and Hamilton Area
AMR	Average Market Rent	HART	Housing Assessment Resource Tools
BC	British Columbia	MZO	Minister's Zoning Orders
BAU	Business-as-Usual	OCAP	Ownership, Control, Access, Possession
CERB	Canada Emergency Response Benefit	OCP	Official Community Plan
CHN	Core Housing Need	RBA	Rights-Based Approach
CMHC	Canada Mortgage and Housing Corporation	REITs	Real Estate Investment Trusts
CRD	Country Residential Development	RGS	Regional Growth Strategies
FIBI	For Indigenous By Indigenous	UBC	University of British Columbia
GBA+	Gender-Based Analysis Plus		

INTRODUCTION

1

1.1 Purpose of the Evaluation

The Housing Assessment Resources Tools (HART) project is funded by the CMHC under its Housing Supply Challenge to develop simple, replicable, comparable, evidence-based and equity-focused housing needs assessment, land assessment and property acquisitions tools, in order to improve policy outcomes at all levels of government.

The goals of the project are to provide:

- **Housing needs assessment data, broken down by income categories, household sizes, and demographics, for all municipalities and regions, provinces and territories, and Canada as a whole**
- **Mapping of well-located government-owned land suitable for the development of non-profit housing for 13 government partners across Canada**
- **Legal and policy toolkits for acquiring properties for affordable housing**
- **Training materials on these tools**

This mid-way evaluation of HART describes and assesses the progress of these project outcomes. This evaluation was carried out by HART's team using two methods.

First, HART held monthly meetings for 13 government partners and 20 members of the Advisory Committee. At each meeting, the participants (averaging at 40+) broke into small group discussion (3-5 participants) to discuss themed questions, for example, how are governments currently supporting use of public land for non-profit housing? What more do we need to know? Notes were compiled and analysed, and the evaluation questions were sub-categorized into housing needs assessments, land assessments, acquisitions, advocacy, and effectiveness.

Second, we met with the 13 government partners individually twice: first in January to March 2022 and then in December 2022 to February 2023. At these meetings, we asked how they were using the information being developed by HART, along with any potential challenges.

The project will conclude in mid-2023.

1.2 Summary of Key Findings

HART's project tools address key concerns or questions that align with themes that our government partners are trying to resolve internally. Overall, the HART project is meeting its expected project outcomes. Our findings are organized into five broad themes: housing needs assessments, land assessments, acquisitions, how HART tools are being used, and future needs.

The first three themes relate to the scope of HART's project tools, while the last two themes provide insight into future research and policy objectives. The Housing Needs Assessment Tool measures need according to affordability thresholds of different income groups, household size and priority populations. The Land Assessment Tool assesses government-owned land across Canada, scoring land parcels using a proximity measures index outlined by Statistics Canada and CMHC. The Property Acquisitions Tool draws from case studies of multi-family property acquisitions to offer best practice recommendations for policies that reinforce the supply of existing affordable housing.

The findings related to how HART tools are being used and future needs speak more broadly to policy implications and paradigmatic shifts needed to continue advancing HART's research objectives. For example, the overarching assumption that homeownership is the normative living situation for Canadians is ingrained in historical housing policies and continues today. Canada's National Housing Strategy lists "improving homeownership options for Canadians" as one of ten areas for investment, through government-backed mortgage loan insurance programs (Government of Canada, 2017, p. 22). However, "a housing system based on the market mechanism cannot adequately – if at all – respond to social need," a factor that has become more prevalent during pandemic policies to prevent evictions and support tenant's capacity to pay rent (Hulchanski, 2006, p. 223). The HART project objectives simultaneously support policies that create the conditions for diverse affordable housing options, while challenging the long-held perception that homeownership is the ultimate milestone on the continuum of housing.

We also highlight several key areas for expansion. These areas include the need to: develop Housing Needs Assessments and Land Assessments cognizant to the needs and unique contexts of Indigenous populations; continued advocacy for integration of a Rights-Based Approach in partner government policy mechanisms, and the need to support non-profit organizations and governments in knowledge sharing and data training.

What is a Rights-Based Approach?

The HART project uses a Rights-Based Approach (RBA). In 2019, Parliament passed the *National Housing Strategy Act* (the *NHS Act*). The *NHS Act* sets out the Government of Canada's housing policy, which "recognize(s) that the right to adequate housing is a fundamental human right affirmed in international law" (Government of Canada, 2023). It also commits Canada to further the progressive realization of the right to adequate housing. The *NHS Act* requires the Government to develop and maintain a national housing strategy. The strategy needs to set out a long-term vision for housing and focuses on improving housing outcomes for those in greatest need.

Housing Needs Assessments



A.1. Housing Needs Assessments should use a consistent definition of affordable housing with comparable affordability measurements.



A.2. Affordable housing programming, targets and funding should be linked to strategic plans within and between governments.



A.3. There needs to be a clear outline of responsibilities in providing and delivering affordable housing within and across government jurisdictions.



A.4. Most governments do not have a formalized policy for expediting affordable housing approvals.

Land Assessments



B.1. The presence of un-serviced land is an obstacle to developing affordable housing.



B.2. The use of non-profit or government-owned land for affordable housing is infrequent.



B.3. Existing zoning should be reviewed to allow supportive housing or increased density.

Acquisitions



C.1. Existing acquisition activities are not formalized due to difficulty developing a consistent approach.



C.2. Acquisitions require a cultural shift within governments and non-profit organizations.



C.3. Acquisitions are considered less expensive than new construction, but acquisition programs receive limited or restricted funding models.

How HART tools are being used



D.1. HART tools offer a consistent framework for Land or Housing Needs assessments.



D.2. HART tools provide accurate and objective data to support evidence-based stories for affordable housing advocacy.



D.3. HART tools can be used to prioritize affordable housing projects by location, proximity amenities, or target populations and foster collaboration

Future Needs



E.1. Local governments require ongoing and permanent support with HNA's for federal and provincial programs.



E.2. Non-profit organizations and governments need support on maximizing data sources and sharing best practices.

EVALUATION BASELINE

As part of the first stage of work, funded by the CMHC from March to September 2021, we undertook a Readiness Survey of 55 municipal and regional housing planners, non-profit housing providers and housing advocates across Canada.

The full responses of Phase 1's Readiness Survey can be found [here](#).

The evaluation baseline is established on the results from HART's June 2021 Readiness Survey, which was in the format of an online survey. The survey had additional questions depending on whether the respondents' organizations had already completed a housing needs and/or land assessment in the past ten years, to further describe the methodologies used. The Readiness Survey was completed by 55 respondents across Canada, of which 21 belonged to governments or housing providers in British Columbia. The other respondents were located in Nova Scotia, Alberta, Québec, Ontario, Saskatchewan and the Yukon Territories.



2.1 How well were Housing Needs Assessments and Land Assessments working to inform housing policy?

65% of respondents reported that they had completed a housing needs assessment in the last ten years, and their experiences raised several key themes. Firstly, the income categories used to define housing affordability were inconsistent, with the most frequent methodology being income deciles. Secondly, priority populations were inconsistent, with seniors emerging more frequently and racialized households less common. Finally, the loss of affordable housing was not commonly included in housing needs assessments, due to insufficient or unavailable source data.

Many organizations (17 of 55) had completed a land assessment, including underutilized or surplus municipal land. Nine of these assessments had included non-profit land, such as faith-based land or existing social housing. Some respondents reported that their land assessments had identified provincial (6 respondents) and federal (5 respondents) land, and recommended that facilitating improved cooperation between higher tiers of government and municipalities to support municipal level organizations identify opportunities for affordable housing on provincial or federal land. Respondents who examined buildings for potential acquisition most commonly assessed existing low-rent apartment buildings, existing rooming houses, and hotels.

2.2 What did respondents need to know?

Respondents noted several drawbacks to conducting initial or further housing needs assessments, including insufficient local-level data, lack of in-house capacity according to current methods, a seeming lack of ability to convince politicians, and the insurmountable gap of overcoming housing need without corresponding policies. Respondents listed the following resources as useful: a clear template for need assessments, a thorough guide on finding data, training on how to do need assessments, and how to link needs assessments with policy mechanisms.

There were two recurring responses when asked what type of assistance would support successful land assessments: a template for land assessment methods (25 respondents), and training on land assessment methods (20 respondents).

2.3 What were the gaps?

Respondents who had completed housing needs assessments noted common challenges, including a lack of methods standardization, barriers to accessing necessary data, insufficient training or lack of staff. Respondents who had completed land assessments cited a lack of training (20 respondents), lack of methods standardization (16 respondents) and poor access to data (15 respondents) as significant barriers. The most common challenge in accessing data, was finding information on properties owned by other government entities or non-profit organizations.

EVALUATION FINDINGS

3

HOUSING NEEDS ASSESSMENTS

“ We’re running out of tools to provide housing for those in deep need, and that housing stock is disappearing. ”

3.1

Finding A.1 Housing Needs Assessments should use a consistent definition of affordable housing with comparable affordability measurements.

Although many governments have completed or are currently completing housing needs assessments, a common challenge is the use of different affordability measures and definitions, both internally (within a municipality) and across jurisdictions. These varied affordability measures result in different housing projection needs and non-comparable data indicators over time. For example, the use of Average Market Rent (AMR) as an affordability baseline for developing targeted affordable housing is not suitable when targeting low incomes. One partner noted that they had moved from using AMR to define affordable housing, to using household income categories instead. A majority of participants described how a consistent, comparable, and quantifiable outline of affordable housing indicators should be identified, measured and tracked over time. This is important for developing housing strategies, while also supporting a common language on affordable housing. The use of common definitions and terms would allow for coherent communication on affordable housing programming, particularly in mitigating NIMBYism or negative perceptions to project proposals. Some participants noted how clearly defined and shared affordability measurement indicators would aid in assessing which types of housing stock to preserve or not. Some participants also described how reliable affordable housing data indicators would support anecdotal housing need reported by front line workers in the housing sector, thus building a stronger case for additional programming.

How is affordable housing currently defined?

In Canada, affordable housing is defined as dwellings costing “less than 30% of a household’s before-tax income” (Canada Mortgage and Housing Corporation, 2018a). Although this definition has been characterized as overly broad, its indeterminacy has carried over to affordable housing programming and targets, where provinces and territories have developed their own definitions and benchmarks.

What is Core Housing Need?

A household is in Core Housing Need (CHN) if their “housing does not meet one or more of the adequacy, suitability or affordability standards and it would have to spend 30% or more of its before-tax income to pay the median rent” (Canada Mortgage and Housing Corporation, 2022b). Acceptable housing is defined according to condition, size, and affordability; adequate housing “does not require any major repairs,” and suitable housing relates to the number of bedrooms in relation to household size (Canada Mortgage and Housing Corporation, 2022b).



Finding A.2 Affordable housing programming, targets and funding should be linked to strategic plans within and between governments.

What is the Housing and Homelessness Plan?

In 2010, **Ontario** introduced the *Long Term Affordable Housing Strategy*, requiring its 47 service managers to create 10-Year Housing and Homelessness Plans (Plans), which are comprehensive documents intended to support accountability efforts, track progress and provide comparability between regions or municipalities. The 2011 *Housing Services Act* also requires that service managers review their Plans at least every five years. Several participants emphasized how their Plans were developed with significant community engagement and partnership with non-profit organizations. However, several participants described how the Plans are poorly coordinated with Official Plans or other strategic documents, thereby undermining the potential effectiveness of the Plans.

A recurring theme amongst participants is the need for integration of inter-departmental strategic planning documents and policy targets both within and between government tiers. Some participants noted that it is difficult for lower levels of government to set affordable housing targets without provincial or federal support or funding. This challenge of “policy silos and horizontal management reiterates the importance of cooperation between lateral government groups to enhance effectiveness and minimize overlap” on strategic targets, not limited to housing (McDonough & Wekerle, 2011, p. 33). Within individual governments, departments have different scopes or mandates that may diverge when separate units are responsible for planning, zoning and development phases. For example, one partner noted that data on municipally-owned assets are housed in separate portfolios, creating challenges for holistic strategies or assessing progress as a whole. As such, many participants cited the need for integration in reference to siloed housing, planning and real estate responsibilities, that would better clarify and contribute to meeting affordable housing objectives and targets.

For example, Ontario’s Housing and Homelessness Plans (Plans) were often mentioned as comprehensive documents developed with many stakeholders, that could be linked to flexible housing programs, targets and funding thereby enabling flexibility according to local jurisdictional contexts. Although Plans represent a significant step in mandating structured reporting on affordable housing, this is currently limited to Ontario. Furthermore, Plans or similar strategic plans should not be perceived as stand-alone documents.



The importance of flexible housing programs and funding, particularly from higher tiers of government, is highly relevant in addressing the housing needs of urban areas, rural areas and small towns. Although there is extensive literature and anecdotal evidence describing the dichotomy of urban versus rural housing need, this is not necessarily reflected in the affordable housing targets or available funding designated to that area. Several participants described how housing funding is confusing, fractured and uncertain, particularly in governments with a comparatively smaller tax base. Most housing programs are one-size-fits-all, leaving geographic distinctions such as the cost of construction, labour, and predominant housing typologies less prioritized. For example, addressing affordable housing in smaller towns or rural areas with predominantly single-detached homes require creative strategies in maximizing the existing stock, that cannot necessarily be replicated in urban areas with predominantly multi-family dwellings. An additional benefit of integrating municipal strategic documents is minimizing existing difficulties in setting or meeting affordable housing targets and supporting existing renters in maintaining their housing. Flexible affordable housing programs based on CHN data could address the lack of policy responses to support low-income households in CHN, as one partner noted existing policies are mostly focused on moderate income households, while the low end of the rental market currently does not have the capacity to meet everyone's needs. This would encourage more proactive affordable housing policies as opposed to reactive short-term funding programs and timelines.

What is required in BC's Housing Needs Report?

As of 2019, **British Columbia** requires local governments to produce a housing needs report every five years. This Report requires local governments to collect about 50 distinct data indicators on current and projected population, household income, economic sectors, and current and anticipated housing units to inform current and projected housing need, and complete a standardized summary form (Province of British Columbia, 2021b).

Despite the standardized summary form for local governments to fill in, many local governments have used varying methodologies to quantify housing need according to the specific sub-sections as prescribed. For example, population projections used different methodologies or proxies to address data suppression, such as Business as Usual (BAU) models for population growth and housing construction. The use of varied methodologies to fill out a standardized needs report impacts the potential to compare findings from the Housing Needs Reports across jurisdictions. Furthermore, "the number of units actually required to address needs may not be the same as the estimated number of current households in need" (City of Vancouver, 2022, p. 55).

Finding A.3 There needs to be a clear outline of responsibilities in providing and delivering affordable housing within and across government jurisdictions.

An underlying theme that challenges successful provision and delivery of affordable housing are undefined roles and responsibilities on the part of various jurisdictions. Some participants noted these unclear roles are attributed to post-amalgamation or more generally, the shorter history of municipal responsibility for affordable housing, thereby necessitating additional support from higher levels of government. After the federal responsibility for delivering affordable housing was downloaded to the provinces and territories in the 1990s, many municipalities found themselves “struggling to build, retain or even adequately repair the social housing” they were now responsible for, without “sufficient tax revenues to meet these new responsibilities” (Mah & Hackworth, 2011, p. 58). Several participants emphasized that municipalities need to be in discussion with regional, provincial and federal actors regarding affordable housing policies. Although local governments are in a better position to deliver affordable housing programs specific to local context, “municipalities currently have few revenue tools to draw on” and “need to be given a more sustainable funding arrangement” (Drummond, Burleton and Manning, 2004, p. 54).

Furthermore, two-tier governments face added difficulty in co-locating services and managing service provision when local governments have conflicting mandates, particularly regarding affordable housing. Some participants also acknowledged that an additional aspect of outlining roles and responsibilities in affordable housing, is highlighting how for-profit and non-profit developers can be part of the solution. This would hopefully encourage broader, more diverse stakeholder support, as opposed to a one-way conversation of what developers need to contribute. For example, affordable housing projects need flexibility to ensure deeper affordability, and private sector developers could offer more resources to support affordability requirements.



Finding A.4 Most governments do not have a formalized policy for expediting affordable housing approvals.

Although many participants agreed that affordable housing development is a priority among project proposals, there are few formalized policies to expedite affordable housing projects throughout the approvals process. Challenges such as staff capacity or burnout, application volume, lengthy legal reviews and due diligence, public opposition or delays from political cycles create temporal obstacles to fast-tracking affordable housing. Additionally, the present economic context has pressured many cities into stabilization mode, to ensure that current housing projects are completed.

Some participants noted that the processes of expediting affordable housing approvals also depends on the capacity to categorize land parcels or projects according to projected development timelines. For example, organizing land parcels or affordable housing projects according to zoning approvals, Official Community Plan amendments or potential NIMBY opposition, would result in shovel-ready projects with a higher likelihood of receiving government funding and expedited reviews.

Some participants who are actively expediting affordable housing describe having a priority approval process, having a team or task force dedicated to accelerating projects (not specific to affordable housing) or reducing provider costs, having an informal agreement to prioritize affordable housing, following priorities according to the Housing and Homelessness Plan, replacing existing zoning with categories based on massing (as opposed to unit types), or using Letters of Understanding to bypass lengthy legal reviews. However, it was acknowledged that informal agreements to prioritize affordable housing are conditional on staff turnover, and need to be formalized for new staff. One partner suggested that affordable housing strategies should be integrated into OCPs, to ensure implementation through zoning bylaws or official plans. One partner described how a close working relationship with their municipal real estate team supported analysis of existing assets and creative affordable housing ventures. However, these are mainly opportunistic activities that are currently being formalized in a comprehensive strategy including land acquisitions. Once again, two-tier

What is a two-tier municipality?

In **Ontario**, “the upper-tier municipality delivers certain services within its geographical boundaries” (Government of Ontario, 2018). Bill 23 *More Homes Built Faster Act*, 2022 has removed planning powers from some upper tier municipalities, and passed those onto lower tier municipalities.

British Columbia has Regional Districts and Municipalities, with the former including municipalities, electoral areas and Treaty First Nations (Province of British Columbia, 2023b). Regional Districts are responsible for region-wide services, some inter-municipal or sub-regional services, and some local services for unincorporated communities. Regional Districts complete regional growth strategies (RGS) which “provides general guidance on a region’s growth, change and development over a minimum 20-year time frame” in alignment with “regional district and municipal policies, plans and projects” (Province of British Columbia, 2021a).



What are Official Community Plans (OCP)?

In **British Columbia**, the Official Community Plan “describes the long-term vision of communities,” by outlining “objectives and policies that guide planning and land use management” (Province of British Columbia, 2023a). All by-laws need to be consistent with an OCP, and OCPs should have specific plan statements and map designations, including “residential development required to meet anticipated housing needs over a period of at least five years,” (Province of British Columbia, 2023a). The OCP provides opportunities for engagement and consultation with community organizations, residents or authorities prior to approval, and coordinates planning of long-term social planning, land use, and economic development.

What are Minister’s Zoning Orders (MZO)?

In **Ontario**, the Minister’s Zoning Orders “gives the Minister of Municipal Affairs and Housing the authority to control the use of any land in the province,” and prevails over a conflicting municipal bylaw (Government of Ontario, 2019). Due diligence should be followed prior to requesting an MZO, including consultation and engagement with relevant conservation authorities and Indigenous communities (Government of Ontario, 2019).

governments have a particular challenge, because most housing policies tend to be set at the lower tier, while the upper-tier regional government would have to integrate the distinct requirements of multiple local jurisdictions into an expedited approvals process.

Some participants noted that obstacles towards approving affordable housing projects could be alleviated if project proposals were aligned with political objectives, did not require OCP amendments, or removing appeal rights for OCPs. For example, Minister’s Zoning Orders (MZO’s) were referenced as a tool to fast-track projects or rezoning. However, some participants noted that MZO’s are highly dependent on whether affordable housing projects are aligned with political targets and could potentially garner community opposition, due to the perception that they benefit developers at the expense of citizens. The challenge of managing optics was reiterated by one partner who mentioned how politicians’ decisions might be oversimplified into supporting affordable housing versus density.

LAND ASSESSMENTS

“ Provision of land is the most effective and important way to reach affordability. ”



3.2

Finding B.1 The presence of un-serviced land is an obstacle to developing affordable housing.

A recurring theme that emerged when discussing affordable housing development in rural or smaller communities, is the challenge of large tracts of un-serviced land (e.g. no water or sewer infrastructure) that are unsuitable for development. For example, in **Halifax, Nova Scotia**, the “hardrock environment presents severe difficulties for the extension of sewer and water lines” and has resulted in particular development patterns according to serviced suburban areas and unserviced country residential development (CRD) (Millward, 2002, p. 34). In addition to topographical characteristics defining the nature of Nova Scotia’s urban development, 29% of the province is designated Crown land, meaning that the sale of Crown land for private residential use is prohibited (Government of Nova Scotia, 2021).

The creation of service boundaries have seemingly constrained residential development to certain geographic areas, with few participants noting that it can be difficult to justify affordable housing development on un-serviced land located further from municipal amenities. These un-serviced land parcels are less likely to benefit from tax breaks or incentives for development because they are not serviced by municipal utilities, and this is often a prerequisite to qualify for development subsidies. Therefore, three participants noted the importance of knowing if sites are development ready in advance, inclusive of water and sewer infrastructure.



Finding B.2 The use of non-profit or government-owned land for affordable housing is infrequent or not formalized.

Most participants acknowledged the potential of partnering with non-profit organizations or leveraging government-owned land to deliver affordable housing, but few have utilized non-profit or government-owned land for housing. Several participants noted the possibility of using school land for affordable or supportive housing, because these sites are generally well-located in well-serviced residential areas, near recreational centres or parks. However, a few participants described how the use of former school sites tends to be politicized or receive community pushback. One partner mentioned the possibility of partnering with universities and use their land for affordable housing.

Some participants mentioned existing partnerships with non-profit organizations include using land for creative production spaces, with churches to use faith-based land, offering long-term leased land under the condition of providing affordable rental units, or selling sites to developers and using revenue for affordable housing. One partner described how future work in finding non-profit land can be intensified, and engaging non-profit organizations to gauge the level of interest in developing affordable housing. However, a few participants noted that partnerships and collaboration are dependent on the level of leadership and capacity to steer affordable housing projects, and land purchases are expensive for local governments to undertake without provincial support. Furthermore, private developers are more viable partners when developing affordable housing, as some participants noted they are less likely to have funding restrictions than non-profit developers.



Finding B.3 Existing zoning should be reviewed to allow supportive housing or increased density.

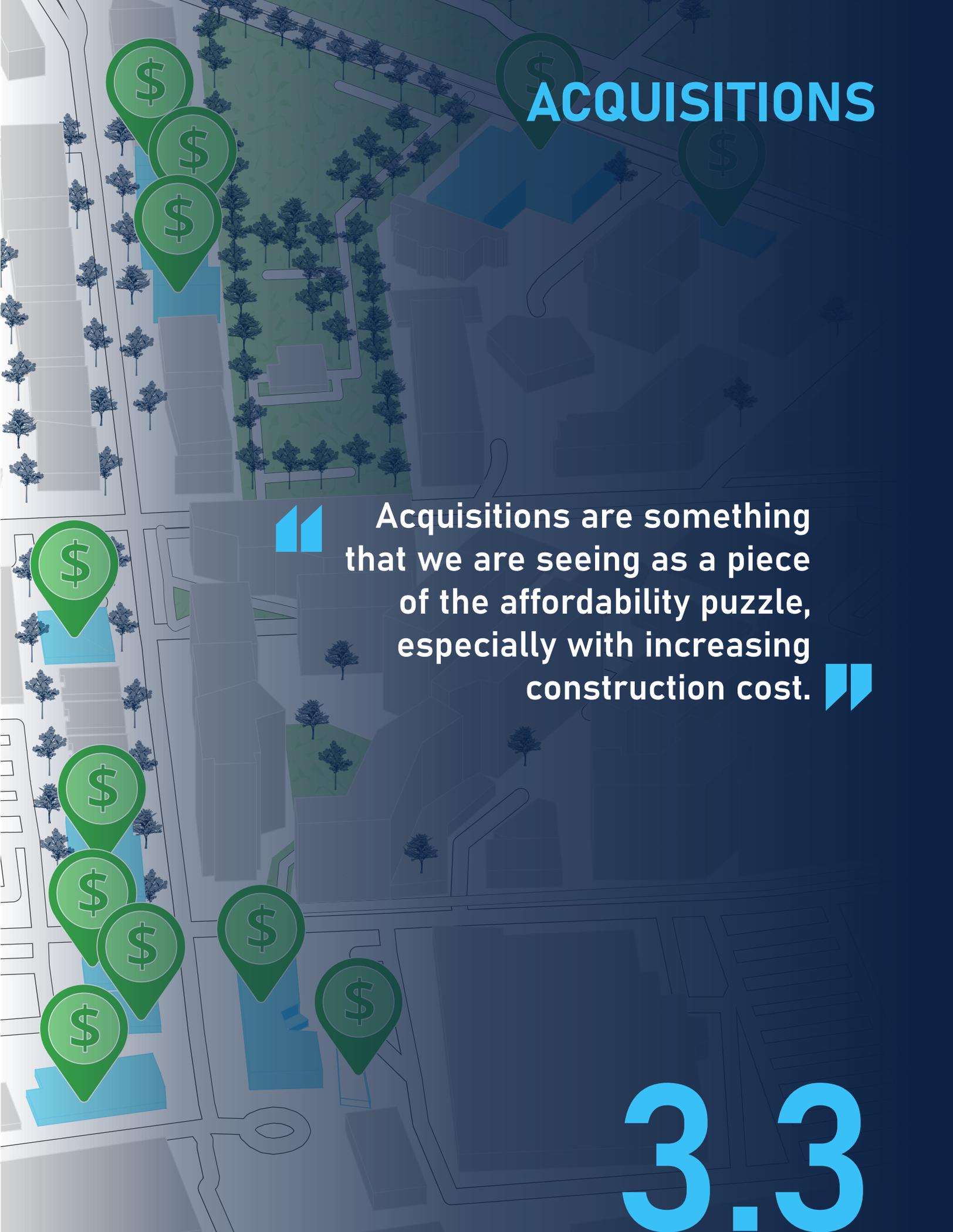
Many participants described how affordable or supportive housing project approvals are delayed due to lengthy zoning use changes or needing to raise height and density allowances exponentially to increase the number of units needed for unit mix. Recommendations to circumvent potential delays include reviewing existing zoning in advance, to change zone uses and allow for more affordable and supportive housing, rapid housing, hotel conversions, secondary suites, increased height and density, or remove minimum parking requirements. This would allow sites to be pre-zoned for affordable housing projects and increase the likelihood of council approval or federal funding. One partner noted that intensifying or densifying existing sites is often easier than finding new land parcels, especially if those land parcels cannot be developed or require expensive remediation. The difficulty of zoning reviews and changes to support affordable housing is particularly challenging in Ontario, where zoning needs to be updated after amalgamation and jurisdictional changes, and inclusionary zoning only apply to specific areas. One partner described how their public health department had previously evaluated access to amenities and services to inform strategic planning, which could be used to justify rezoning for future affordable housing projects.

What is Inclusionary Zoning?

Inclusionary zoning or housing policies require a specific proportion of new residential construction to be designated as affordable housing, thereby creating inherently mixed-income communities. In Canada, inclusionary zoning has been introduced in various cities, including Vancouver, Montréal, Toronto, Edmonton and Richmond.

Montréal's Inclusionary Housing Strategy was adopted in 2005, and considers a dwelling to be affordable if the monthly rent or mortgage does not exceed 30% of a household's gross monthly income (Ville de Montréal, 2005). The Strategy objectives include leveraging housing subsidy programs, using municipal land, engaging major public landowners, and adapting municipal service delivery as needed. Montréal's Strategy required that new large residential developments (200 units or more) need to designate at least 30% of the units as affordable housing, with 15% as social housing and 15% as affordable rental/ownership (Mah & Hackworth, 2011).





ACQUISITIONS

“ Acquisitions are something that we are seeing as a piece of the affordability puzzle, especially with increasing construction cost. ”

3.3

Finding C.1 Existing acquisition activities are not formalized due to difficulty developing a consistent approach.

Although many participants expressed interest in pursuing or expanding land and building acquisition strategies, a shared challenge was developing a consistent approach that could address common obstacles when approaching potential acquisitions. For example, several participants with experience in past acquisitions described short time frames to act, a lack of long-term guaranteed funding sources, complex and expensive renovation requirements, challenges with debt capacity, and aligning acquisitions with target populations.

The limited timeframes to act were mentioned in particular when supporting non-profit organizations in pursuing acquisitions, and the difficulty of moving quickly before private investors with more equity or resources. The ability to ensure money is available prior to the acquisition was often uncertain and might require pooling various funding sources, which is not always feasible in a short window of time. Several participants expressed interest in developing pre-approval strategies that would allow non-profit organizations to move quickly when government funding is presented.

A majority of participants also highlighted the lack of guaranteed, long-term funding that would allow governments to pursue acquisitions. A few participants described either already having the knowledge and resources, but the larger hurdle is identifying and obtaining funding opportunities. This leads into the second obstacle, which is potentially expensive building renovation requirements that would hinder acquisitions in the initial stages. A commonly mentioned obstacle is the projected cost of acquiring, renovating and operating affordable housing as opposed to new construction, and the lack of operating dollars from funding sources. This lack of long-term guaranteed funding for acquisitions is framed in the broader question of how to do acquisitions in the absence of specific government programs or shifting government policies.

Frequently mentioned building renovation obstacles include energy efficiency requirements, accessibility, and asbestos, while rezoning applications can also delay occupancy requirements within a given deadline according to funding criteria. Several participants mentioned difficulty meeting climate and accessibility requirements, and a preference for flexible program requirements to encourage more acquisitions. The importance of established procedures to guide renovation and service standards for acquisitions was highlighted as a strategy to mitigate delays, while also ensuring quality standards comparable to other housing providers or market rental.

**“What scale is realistic? Does it make sense to front load small projects for sustainability?
...Is there any value in having a Land Trust...or do we transfer land to a non-profit right away?”**



Some participants from governments currently doing acquisitions or supporting acquisition efforts described the need for a more efficient process, particularly in balancing the volume of properties being targeted with the acquisition budget, to avoid unnecessary efforts. The importance of reconciling due diligence with quick turnaround within a given timeline was also referenced in situations where there are existing tenants with lease agreement rights and specified affordable rents. Some participants also mentioned an essential element of acquisitions is a clear process for governments to consistently find acquisition opportunities. For example, one partner actively pursuing acquisitions focused on neighbourhoods that were behind in meeting social housing targets, while another partner suggested looking at tenants who are at the end of agreement, to ensure the least amount of disruption during transfer. One partner noted interest in social housing development on sites large enough to accommodate tenants staying for the duration of redevelopment projects.

Having a clear process is predicated on determining responsibilities for different phases of acquisition strategies, whether done independently or in collaboration with the real estate sector. Another partner described how some governments are currently supporting acquisitions by non-profit partners via financial aid, and highlighted a potential for the municipality in conducting due diligence or identifying properties emerging on the market. Local governments likely have more capacity, resources or relationships to do so, but this requires set parameters to ensure efficiency. Furthermore, one partner noted the importance of having a measurable performance indicator or objective to justify continuing or scaling up existing acquisition activities.

A recurring theme is that acquisitions are not a one size fits all solution, and need to be presented as part of a broader set of tools. This recalls the challenge of aligning acquisitions with housing policies and affordable housing target populations, as one partner acknowledged that existing available buildings might not be suitable for target populations, locationally or structurally. For example, an partner with housing acquisition experience mentioned that the municipality did not have many vacant multi-residential buildings, but rather more hotels or building typologies, while another partner described partnerships with non-profit organizations to do office conversions, by providing grants or rebates on developer fees. The difficulty of aligning available assets to affordable housing targets is also relevant for land acquisition, with one partner describing past acquisitions of residential land with poorly maintained housing needed to be demolished and rezoned for higher density residential units.

Finding C.2 Acquisitions require a cultural shift within government institutions and non-profit organizations.

Nearly all participants acknowledged the necessity for a cultural shift internally to adopt aligning government real estate departments, with an emphasis on highest and best use of land, with an approach based on the common good. Risk mitigation and risk avoidance were often mentioned as barriers to acquisition strategies, with some housing programs characterized as overprescribed and therefore inflexible for local contexts.

Several participants noted that this cultural shift is part of a larger mentality that the housing issue is inherently a lack of supply that can only be resolved by building new. This ingrained notion about building new can also potentially lead to competition of capital going to new construction versus to acquisition of affordable housing. One partner raised the point that ultimately, the philosophy within which housing programs are grounded, need to question if the goal is housing creation or risk mitigation.

The long-standing mentality of new construction as the overarching solution to affordable housing supply is evident in existing housing programs, as many participants described how many housing programs are overregulated or overprescribed, therefore giving less flexibility for unique contexts or supporting long-term acquisition strategies. This lack of flexibility also creates difficulty for non-profit organizations to scale up operations, if they cannot obtain financial backing due to having less equity or assets. For example, one partner mentioned how partnership opportunities with smaller organizations are less likely due to lack of experience or resources, while in turn, partnerships with private development partners often prefer new construction. Many participants recommended that non-profit organizations need to be supported in providing affordable housing, by leveraging finance, reducing risk and providing sustainable long-term funding to build organizational capacity over time. For example, property tax subsidies were mentioned as a method to reduce operational burden and utility bills. One partner also noted that private sector developers had a crucial role in supporting the affordable housing gap, recognizing that non-profit organizations need time to build capacity and scale.

This flexible and adaptable mindset was referenced for both non-profit organizations and governments in order to support non-profit organizations in building capacity, programming, and reacting in a limited window of time. One partner described how acquisitions are emphasized to varying degrees in the housing and planning divisions, but an underlying concern is the ability or capacity of the non-profit sector to manage new housing. For example, one partner expressed the need for a real estate division team who actively search for potential acquisition opportunities, recognizing the limited time frames to act.



Finding C.3 Acquisitions are considered less expensive than new construction, but successful acquisitions programs are contingent on operating subsidies.

Many participants acknowledged the increased cost of new residential construction, particularly in communities where labour and supply chain costs constrain the capacity to build affordable housing. Large-scale global events have exacerbated these prices, to the extent that in the first quarter of 2022, residential construction costs increased about 5.6%, amid a context of high labour costs, increasing transportation costs and “a surge in the number of vacancies for construction trades” (Statistics Canada, 2022). A few respondents described the constraints of construction capacity in the Yukon Territory and Greater Toronto and Hamilton Area (GTHA) respectively, citing lack of labour availability and supply chain issues. In the Yukon, Nunavut and Northwest Territories, construction costs are “much higher due to the high cost of land, the specialized building materials needed to combat moisture and mold, and the expense of delivering construction materials” (Canadian Housing and Renewal Association, 2014, p. 1). In the **Yukon Territory** specifically, current dollar investment in residential building construction decreased 9.4% from 2021 to 2022, with \$254.3 million in investment from January to December 2021, to \$230.5 million in January to December 2022 (Government of Yukon, 2023, p. 2). As a result, the “lack of predictability or control over costs” creates uncertainty in estimating when “new housing units come onto the market”, including affordable housing (Canada Mortgage and Housing Corporation, 2022a, p. 8).

“Acquisition can be very effective in increasing affordability, than through new build.

This is the crux, new supply is still driven by profit.”

A majority of participants noted that acquisitions are generally less expensive in comparison to new construction, contributing to its attractiveness to increase affordable housing. However, some participants frequently emphasized that acquisition programs often receive limited or restrictive funding models, thereby making it difficult to ensure long-term affordability measures. For example, the Co-operative Housing Program administered by the CMHC until the 1990s, with “featured preferred financing rates, forgivable capital contributions, interest rate write-downs and/or a full operating subsidy” which could maintain affordability for low-income households (Canada Mortgage and Housing Corporation, 2018b).

One partner mentioned that acquisition often has cost-prohibitive long-term capital obligations that need to be assessed prior to investment. For this reason, non-profit housing developers are at risk of living “year to year and project to project because they do not have a steady, predictable stream of operating funds” (Dreier & Hulchanski, 1993, p. 67). Acquisitions have the added benefit of more accurate prior knowledge of maintenance costs as opposed to new construction, which is important to know for funding applications.



HOW HART TOOLS ARE BEING USED

“ We plan well for total stock, but we don’t consider the distribution of housing for different income groups. Where should shelters or schools go?

This map [HART Land Assessment Tool] serves us to create a holistic view of how housing and health are connected, to think about how to maximize outcomes through housing.”

3.4

Finding D.1 HART tools offer a consistent framework for Land or Housing Needs assessments.

Participants agreed that a primary benefit of HART tools is that they serve as a consistent and clear benchmark for internal data collection, analysis and measurement when conducting land or housing needs assessments. Governments that have already completed needs assessments, especially with limited resources, highlighted how HART tools offer opportunities for more local level, granular assessments of different housing types in CHN, or can validate completed need assessments methodologies. For example, one partner mentioned the possibility of viewing data on first-time homeowners or renters separately from the broader group. Another pointed out that it would be efficient for one central authority to complete need assessments across the entire province, thereby providing a baseline for governments to compare and potentially specify a starting point for affordable housing goal setting. Some participants also described how HART tools offer internal consistency among staff when defining affordability, and can initiate conversations around maximizing housing outcomes through holistic approaches (e.g. housing in relation to health) or discussions around acquisitions.



Finding D.2 HART tools provide accurate and objective data to support evidence-based stories for affordable housing advocacy.

Nearly all participants referred to the potential of HART tools as a source of accurate, objective, trustworthy and reliable data to underpin evidence-based stories when presenting housing need or affordable housing projects to politicians, the general public, the media, or neighbourhood groups. In this capacity, HART tools have a role in bridging the gap between data and policy, to support further dialogue about a Rights-Based Approach, acquisitions or affordable housing more generally.

The HART Land Assessment Tool was cited as an advocacy tool to justify top-down decisions, manage expectations on project locations, and align data on housing typologies with zoning use, so projects receive less opposition. The Land Assessment Tool could also be used to dispel common misconceptions that governments have no existing land for affordable housing, and bring attention to underutilized available land. Some participants also cited the potential of HART Housing Needs Assessment information on income data to advocate for targeting specific affordability levels for housing, and support government intervention. For example, one partner described how HART data could support governments in advocating for long-term funding beyond one-time grants or programs. One partner cited limited funding for governments to develop, and the HART Land Assessment Tool would help in finding the best, well-located site and bolster a defensible proposal before council. Another partner described how the priority populations identified in HART data would support targeted funding requests to develop corresponding affordable housing.



Finding D.3 HART tools can be used to prioritize affordable housing projects by location, proximity amenities, target population or potential partnerships.

Many participants highlighted how HART tools can support prioritization and acceleration of affordable housing projects according to location, presence of amenities, target population or partnerships with non-profit organizations, for-profit organizations or other jurisdictions. For example, one partner described how the HART tools could support decision-makers in understanding problems and appropriate solutions.

Affordable housing prioritization according to location of land parcels would consider existing zoning, intensification or redevelopment potential, while identifying underappreciated sites and potential zoning bylaw changes. Some participants also described how the HART Land Assessment Tool could show how land parcels targeted by government or housing developers are lacking amenities, and point towards other more well-located sites to prioritize.

Some participants also mentioned how HART tools can support prioritization of coordinated affordable housing distribution according to different income groups, as opposed to planning for total housing stock or using generalized methodologies which exclude locational need. For example, some participants mentioned currently measuring need and demand according to social housing waitlists, and how current capital programs are targeting an insufficient number of households in CHN. HART tools could be used to ensure the right housing typologies are built in the appropriate locations, and highlight specific target populations according to their affordability levels.

One partner characterized the Land Assessment Tool as a launch-pad into more granular assessments. Related to this, several participants described potentially combining the HART Land Assessment Tool with other qualitative information and maps, or the prospect of integrating data and analysis into a site selection tool. For example, land assessments can be combined with maps on existing affordable housing distribution to compare land parcels for future development, with existing transit masterplans to identify areas where transit is lacking, with existing parking lots to support proposals for combining underground parking with affordable rental development, with morphological features such as floodplains and flood basins, or with social housing waitlists to better understand where people want to live. One partner also referenced the Land Assessment Tool's assessment of community assets or amenities, and the capacity to align affordable housing with community need assessments to identify demographic-specific assets when building housing.

“There’s a notion that ‘we’re out of land’ that we can dispel with this [land assessment] map.”



“This research will help add perspective that tied-to-market affordability is not enough...

Maybe we can use it to re-orient who we are targeting, what they can afford, and what policies we can use.”

Finally, the HART tools could be used to prioritize affordable housing projects according to potential partnerships with non-profit organizations, for-profit organizations, or adjacent jurisdictions owning well-located land. Participants noted how the HART Land Assessment Tool is helpful to visualize provincial and federal land assets, and identify land owned by adjacent authorities that can form a future partnership or acquisition. This could also be used to highlight gaps in government levels, identify opportunities to advocate for new legislation, and support funding applications for development. One partner noted that some existing funding instruments are uncoordinated by the time they reach the municipality or regional level, and HART tools can be leveraged to rethink the organization of funding available to lower orders of government. However, one partner noted that while the Land Assessment Tool could be used to advocate for funding for upper-tier governments, there are potential challenges in understanding how to use the Land Assessment Tool for regional planning in two-tier governments.

FUTURE NEEDS

“Indigenous women are not thought of as having a right to own a home that they can help design...

Put the position of lived expertise as the helm of these kinds of projects.”

3.5

Finding E.1 Local governments require ongoing and permanent support with HNA's for federal and provincial programs.

What does For Indigenous, By Indigenous (FIBI) mean for affordable housing plans?

The Aboriginal Housing Management Association (AHMA) describes FIBI as a First Nations principle that can guide strategic planning, rooted in “belonging, cultural respect, and honouring Indigenous traditions” (Aboriginal Housing Management Association, 2021, p. 4). “The FIBI Strategy recognizes the right of the Indigenous People” alongside “with the housing and service providers that serve them to have standing and to have the recognized right to negotiate as a negotiating and delivery entity” (Indigenous Housing Caucus Working Group, 2018, p. 9).

The **City of Calgary** recently completed a report on affordable housing needs of Indigenous Calgarians, with “Elders and knowledge keepers, Indigenous-serving housing providers and service organizations, Nation administrative leadership, as well as Indigenous Calgarians with lived experience” (Calgary Housing, Affordable Housing, 2022, p. 1). Engagement was “guided by a parallel oral governance model,” and framed by “OCAP™ (ownership, control, access and possession) and FIBI (For Indigenous, By Indigenous)” concepts (Calgary Housing, Affordable Housing, 2022, p. 3).

Many participants described the need for support in conducting scoping Housing Needs Assessments, namely for the analysis of urban Indigenous housing need.

Nearly all participants acknowledged the significance of documenting housing need specific to urban Indigenous populations, in order to develop Indigenous-led affordable housing strategies and projects. Some participants described this need coming to the forefront during the pandemic as they experienced an increasing trend in the number of Indigenous peoples moving from reserves to urban areas to access services or employment. However, several participants cited inadequate or aggregate data on Indigenous housing conditions and CHN, and insufficient data gathering or lack of funding for Indigenous governments to do housing needs assessments. Similar to the general need for a consistent and comparable affordable housing data to support funding applications, several participants noted the need for reliable data on urban and rural Indigenous housing or Indigenous household income to support funding requests and housing affordability plans. For example, future Canada Housing Surveys could be expanded and more in-depth to include Core Housing Need (CHN) undercounting.

Some participants already have or are currently developing affordable housing for urban Indigenous or Indigenous housing strategies in partnership with Indigenous consultants, community members and housing providers, and pointed out several areas with capacity for improvement. For example, seeking and developing relationships with Indigenous organizations and active community engagement, expanding engagement to include smaller organizations with expertise, the challenge of staff or leadership turnover, or difficulties in hiring Indigenous research assistants due to highly specific employment criteria. Some participants noted difficulties in moving non-profit organizations from the services sector to planning and policy-making. Other participants currently developing housing needs assessments have a focus on priority



populations, within which specific mention is made of housing need for Indigenous people.

More broadly, several participants described how conducting Indigenous Housing Needs and Land Assessment research needs to go beyond focusing solely on supply, but also building capacity on maintaining existing housing in acknowledgment of barriers faced by the Indigenous community. Some participants also mentioned that comprehensive Indigenous housing strategies need to be included in long-term planning, such as 10-year strategic documents. Furthermore, FIBI policies need to work in tandem with other policies, rather than being separated or siloed. Some participants noted the potential of HART's Land Assessment Tool to support land back and advocacy efforts with Indigenous partners, particularly in developing potential partnerships with First Nations in long-term leases, starting projects or creating non-profit entities and community land trusts.

Participant comments regarding ongoing support in carrying out productive and thorough Housing Needs Assessments, also referenced the potential for a Rights-Based Approach (RBA) to be integrated into HNA's or housing policy language more broadly. Nearly all participants did not have a formalized RBA in housing policies or programs, while not all participants were familiar with a RBA. A few partners cited a lack of assistance from higher levels of government, including not being able to introduce a RBA or housing rights language without prior similar direction from the province, increased funding from the federal government, or federal leadership in RBA education or training. Despite a RBA being highly relevant in FIBI policy efforts, the right to housing is not enshrined in the Indian Act. One partner addressed the integration of housing rights language with urban Indigenous housing needs, by using an equity-based approach in zoning bylaw reviews, and organizing an advisory committee composed of members with lived experience.

What is AHMA's BC Urban, Rural, and Northern Indigenous Housing Strategy?

The Housing Strategy recognizes how few housing policies are developed collaboratively with or by Indigenous people. The Housing Strategy is "based on existing and projected housing need, gaps in programs and services, and capacity needs of Indigenous housing providers" to "address the housing needs of all Indigenous households," curtail Indigenous experiences of homelessness, "ensure Indigenous people have access to a variety of housing solutions, including homeownership," and "support improved health and wellbeing of Indigenous people" (Aboriginal Housing Management Association, 2022, p. 3).

What is Edmonton's GBA+ and Equity Toolkit?

Edmonton undertook a Zoning Bylaw Renewal Initiative, with a Gender-Based Analysis Plus and Equity Toolkit, that describes "assumptions and biases at the regulation writing stage; identifying social inequities caused by zoning" (City of Edmonton, 2023). This included Community Conversations to describe zoning effects on marginalized communities, finding that "restrictive zoning regulations have acted as deterrents to housing diversity, choice, and affordability" and "discouraged supportive housing units" (City of Edmonton, 2021, p. 9).

Finding E.2 Non-profit organizations and governments need support on maximizing data sources and sharing best practices.

A common theme amongst a majority of participants is the capacity for staff to obtain and analyze data, and to maximize its longevity regardless of potential staff turnover or developing additional targets in future. For example, several participants emphasized the need for training materials, data workshops and tutorials for staff to consult at their own pace, particularly for Beyond 20/20 datasets, to build skills capacity in data analysis methodologies. This includes the lack of capacity to keep up with new data publications, and how to manage data limitations or aggregate data. One concern is that public datasets are not always user-friendly for in-house data analysis, and ends up requiring outside consulting. This challenge of building internal capacity leads to another concern raised by participants: how to support knowledge transfer and knowledge retention within organizations. For example, when governments aid non-profit organizations in acquisitions, the obstacles of staff burnout or volume capacity emerged. Non-profit organizations need support in building knowledge capacity in property development and management, albeit with respect to available resources. A few participants asked if HART's tools would continue to be updated with new data and how often, considering provincial activities in selling land and therefore needing to continually refresh data information for strategic planning. This highlights a need for permanent resources providing consistent and objective Land Assessment and Housing Needs Assessment information.

Finally, several participants described the importance of knowledge sharing on best practices for affordable housing, acquisition strategies case studies, and additional qualitative analysis to support data analysis. This includes training on HART data methodologies, so that governments can organize land and housing needs assessments according to local context or priorities. Examples of best practices for developing affordable housing include policy examples of incorporating varied affordable housing contributions from developers, national case studies of municipal land transfers, co-location of affordable housing projects and civic services. One partner mentioned the usefulness of evaluating long-term leases versus sales when completing land assessments, and the possibility of identifying housing typologies appropriate for available land parcels.

The suggestions regarding qualitative analysis are in response to understanding how to balance the potentially skewed 2021 census data, through public engagement or reporting on specific target populations. As mentioned previously, one recurring concern is the effects of COVID-19 government financial aid on household income categories, thereby impacting how affordability is calculated and defined for affordable housing targets.

“Accessing in-house data analysts is a big struggle. [We] need people who can work with raw datasets to extract meaning.”



ADVISORY COMMITTEE THEMES

Advisory Committee Meetings were held between December 2021 to November 2022, during which key questions emerged regarding the HART tools and future research objectives.

3.6

How should we address census data limitations?

The challenge of limited or suppressed census data was raised, in reference to those who might be left out of CHN counting, such as the hidden homeless, emergency sheltered, students, farmers, or Indigenous residents living on reserve. The difficulty of limited data is linked to the issue that some groups may get locked into a cycle of being in CHN over a prolonged period of time, and are deserving of further attention in Housing Needs Assessments.

One respondent suggested developing a proxy to address suppressed household demand, which could include data indicators such as homelessness counts and SROs, Census Housing Standards according to National Occupancy Standards, social housing waitlists, rental vacancy rate data, household formation rates, data on where people live and work, or outward migration within the same region.

How can the Land Assessment Tool highlight parcel suitability for different demographics?

The Land Assessment Tool currently references the CMHC's proximity measures to services and amenities, to identify well-located land. These proximity measures include: employment, grocery stores, pharmacies, health care, child care, primary education, secondary education, public transit, neighbourhood parks, and libraries. However, a future iteration of the Land Assessment Tool was discussed, that would highlight specific amenities according to certain demographic groups (e.g. seniors) and tailoring the Land Assessment for well-located land parcels according to these updated criteria. To maintain the comparability across jurisdictions and over time, one respondent suggested creating and following predefined templates according to different scoring regimes.

The implications of adapting the Land Assessment Tool according to different demographic groups could support identifying land parcels with amenities that are particularly important for priority populations who are overrepresented in CHN of that jurisdiction. For example, the HART Land Assessment Tool has shown recurring presence of single mother-led households in CHN. A study on housing need of single mother households in Kelowna showed that housing decisions are determined by "available neighbourhood amenities and services, including daycare; nearby social supports; and a safe environment," while often needing to compromise between "smaller accommodations with fewer bedrooms" or "living in unsafe neighbourhoods" (Jones & Teixeira, 2015, p. 120-121). Single mothers who felt satisfied with their neighbourhood attributed this to being "located near parks, schools and other amenities; and they lived near other families with kids" while those who expressed dissatisfaction "cited an abundance of foot traffic and noise, safety concerns due to illegal activities, frequent thefts, and lack of privacy" (Jones & Teixeira, 2015, p. 128). A CMHC report on the housing needs of women in Canada also found that a "well-centred location gives women access to child care, employment, cultural and religious institutions, transportation and food services," with public transit, food services, parks, schools and childcare ranking top five of key services within one kilometre (Canada Mortgage and Housing Corporation, 2021, p. 9-10). Future research around the Land Assessment Tool could consider including adjustable scoring of proximity measures according to priority populations and support governments in meeting affordable housing targets tangentially with social outcomes.

How can HART's tools slow the financialization of housing?

How do provinces and territories address financialization of housing?

Each province or territory has varying levels of rent control, ranging from no restrictions on rent increases at all, to regulations by percentage of current rent or building construction period.

In **Manitoba**, rent control is “tied to apartment *units* and not to *tenants*, preventing the increases enabled elsewhere by vacancy decontrol” (August, 2020, p. 983). Since Manitoba does not have vacancy decontrol, there is a “gross cap on the rent amount that can be charged to a new tenant” and the “new rent amount cannot be more than the average currently charged for comparable units in the residential complex” (Gabarre, 2022, p. 32). Manitoba has comparatively stronger rent controls, with “3.22% of Canada’s apartment units, but only 0.05% of its REIT-owned suites” (August, 2020, p. 983). “The absence of rent controls, which are set by provincial legislation, appears to be strongly related to REIT activity,” as provinces with some form of rent control experience smaller shares of REIT-owned suites (August, 2020, p. 983).

Finally, the question on the role of HART’s tools in the broader scheme of affordable housing planning emerged, in reference to slowing down the financialization of housing in Canada, and supporting non-profit organizations in their ability to compete with real estate investment trusts (REITs). The gradual financialization of housing in Canada reached a critical moment in the 1990s when “government cuts and retrenchment” sparked “a dramatic rise in ‘financialized’ ownership of care homes, retirement properties, and multifamily rental housing,” and again during the COVID-19 pandemic with in tandem with affordability challenges and evictions (August, 2021, p. 289). Additionally, “policy support for the securitization of mortgages” and “deregulation of rent control and the introduction of vacancy decontrol” has contributed to the shifting use value of housing as a home, to becoming a financial asset (August, 2022, p. 4). The severity of these phenomena is emphasized by the fact that “in Canada, REITS went from owning zero to more than 194,000 multifamily suites between 1996 and 2020” (August, 2021, p. 291). The financialization of housing inherently puts “housing-based profits, asset-based welfare, and affordable housing” in contradiction with each other, thereby impacting the extent to which affordable housing policies and programs operating in a neoliberal political sphere can be effective (Kalman-Lamb, 2017, p. 298).

HART tools, specifically the Property Acquisitions Tool, have a potential role in addressing and contesting activities contributing to the financialization of housing, such as acquisition of housing by REITs and financialized landlords (August and Walks, 2018). An example of an acquisition strategy that respondents referred to positively, is Montréal’s right of first refusal policy that enables the municipality to purchase housing at risk of unaffordability. A right of first refusal policy to acquire property or land supports creation of affordable housing on the part of governments, oftentimes with the collaboration of non-profit in managing and delivering affordable housing. By de-linking housing and homes as financial assets for profit, acquisitions through a right of first refusal could situate residential buildings apart from their spatial potential for wealth accumulation or commodification by REITs (Fields, 2015).

CONCLUSIONS AND RECOMMENDATIONS

Several conclusions emerge from HART interviews with partner governments and advisory committee members.

4

1. HART's design and intended objectives continue to be highly relevant.

HART's project outcomes, including standardized housing needs assessment and leveraging government-owned land for non-profit housing and acquisitions are addressing several themes that many jurisdictions across Canada are grappling with to different degrees. The HART project is providing invaluable informational tools, guidance and clarity that our partner governments and Advisory Committee foresee continued need for beyond the project timeline.

2. The HART project is opening additional avenues for further research and expansion on existing tools.

Respondents provided valuable insight on expanding on the Land Assessment and Property Acquisition Tools to promote knowledge sharing and support partner governments in adapting tools to their local context. It is clear that in the current climate of supply chain issues, increasing construction and labour costs, inflation and escalating immigration targets from the federal government, the creation of new and maintenance of existing affordable housing requires added tools utilized at all levels of government.

3. In regard to housing needs assessments, partner governments continued to find internal challenges with inconsistent income categories when defining housing affordability.

Respondents referenced the potential of using HART tools to overcome these difficulties and open the door for more granular analysis. In the June 2021 Readiness Survey, respondents had described difficulty in conducting housing needs assessments due to a lack of local-level data, lack of in-house capacity or lack of ability to convince politicians. In the mid-way evaluation, we found that respondents reacted positively to HART's data workshops and tutorials on Beyond 20/20, and the Housing Needs Assessment Tool's clear data outputs that supported affordable housing advocacy to city council. Additionally, respondents frequently described the need for lateral communication and integration between sectors, noting that strategic plans and programs addressing affordable housing need to be integrated with plans from other departments, to ensure better effectiveness.

4. Zoning issues are a principal barrier identified in relation to land assessments.

A recurring theme from respondents was the need for zoning reviews prior to affordable housing project proposals, to avoid approval delays and open up more well-located land parcels for affordable housing. Compared to the June 2021 Readiness Survey where some respondents had completed land assessments that identified non-profit land, the mid-way evaluation found that developing partnerships or actually using non-profit land for affordable housing was infrequent.

5. Acquisitions are a new issue for many governments.

Most respondents were interested in pursuing or learning more about acquisition strategies to contribute to building affordable housing stock, but cited the need for cultural shift or skills capacity required prior to formalizing consistent and time-sensitive acquisition strategies. This points to additional work to be done in sharing best practices on successful acquisitions, particularly in the absence of long-term federal government programs and funding.

The HART project intends to carry out another survey in June 2023, to continue evaluation of the project outputs, describe what our government partners and Advisory Committee have learned throughout the project, and understand how this research is influencing housing policy in Canada.

APPENDICES

5

Appendix A. Methodology

The evaluation findings were assessed using key informant group interviews and surveys with government partners, housing providers and housing advocates from varied levels of government, composed of questions within the following themes: housing needs assessments, land assessments, acquisitions, advocacy and effectiveness. The group interviews were structured with a large group discussion, followed by breakout rooms with two or three initial questions posed by HART members. The survey was distributed online in text format, with respondents not limited by word count. The evaluation findings were supplemented by individual conversation-style interviews with government partners, housing providers and housing advocates, to provide additional context.

Due to the nature of the group interview format which had both recurring and one-time attendees over a period of time, the following scale is used to organize qualitative data on participant remarks.

All	All participants identified the same or similar topics, or had similar responses.
Many / Majority / Several / Most	More than half (but not all) of participants identified the same or similar topics, or had similar responses.
Some	Between one quarter and one half of participants identified the same or similar topics, or had similar responses.
Few	One or two of the participants identified the same or similar topics, or had similar responses.
No / None	None of the participants identified a specific issue or topic.

Appendix B. Evaluation Questions

Housing Needs Assessments

- 1.1. What is the relevance of the Housing Needs Assessment and Land Assessment Tools we are developing?
- 1.2. Do you feel like you or your team are equipped to use these tools?
 - 1.2.1. What training would need to occur to be able to use this information?
- 1.3. Given the gaps of the 2021 data, how do you plan to use these tools to advocate and plan for housing in your communities?
 - 1.3.1. What further information would you seek out?

Land Assessments

- 2.1. Do you use government and non-profit land for social and affordable housing?
- 2.2. How can our Land Assessment Tool help your work?
 - 2.2.1. What other questions would you seek to answer with this Tool?
 - 2.2.2. What challenges do you anticipate facing when integrating this Tool into your land use planning processes, and how would you overcome them?
- 2.3. Are there things that other levels of government or private and non-profit developers need to do to improve housing outcomes from government and non-profit land?

Acquisitions

- 3.1. What excites you about the potential for acquisition strategies?
 - 3.1.1. Do any of the discussed models resonate for your community?
- 3.2. What would you want to see from us at HART?
 - 3.2.1. 3.2.1 What challenges do you foresee and how can we assist you in overcoming them?

Advocacy

- 4.1. Do you use a Rights-Based Approach in your government's work? If so, how?
- 4.2. How can you advocate for better National Housing Strategy programs as part of the ongoing review?
- 4.3. If you had one message for the Housing Advocate and National Housing Council in their review of the National Housing Strategy, what would it be?
- 4.4. How can governments best support an Urban, Rural, and Northern For Indigenous, By Indigenous Strategy?

Effectiveness

- 5.1. Has your region or municipality implemented any expedited non-profit housing approvals?
 - 5.1.1. What do they look like, and what are the benefits or drawbacks?
 - 5.1.2. If not, what are the barriers to a policy in your region or municipality?
- 5.2. How can you ensure that housing strategies are effectively implemented through zoning bylaws and official plans?
- 5.3. How might HART data help you develop better planning and zoning policies?

REFERENCES

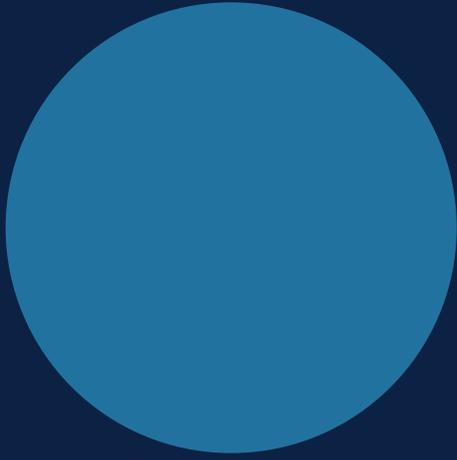
6

- Aboriginal Housing Management Association. (2021). *2021-2022 Activities and Achievements Report* (pp. 1-46, Rep.). West Vancouver, Canada: Aboriginal Housing Management Association (AHMA).
https://static1.squarespace.com/static/573e02ab62cd943531b23633/t/63239730d4639f520d4e43aa/1663276873961/AHMA+AR+202122_final_Spreads.pdf.
- Aboriginal Housing Management Association. (2022). *British Columbia Urban, Rural, and Northern Indigenous Housing Strategy* (pp. 1-75, Publication). Vancouver: Aboriginal Housing Management Association.
https://static1.squarespace.com/static/573e02ab62cd943531b23633/t/61f16e25e94d296b241a7c85/1643212332359/AHMA_BCURNIHousingStrategy_220124.pdf.
- August, M. (2020). The financialization of Canadian multi-family rental housing: From trailer to tower. *Journal of Urban Affairs*, 42(7), 975-997. DOI:10.1080/07352166.2019.1705846
- August, M. (2021). Financialization of housing from cradle to grave: Covid-19, seniors' housing, and multifamily rental housing in Canada. *Studies in Political Economy*, 102(3), 289-308. DOI:10.1080/07078552.2021.2000207
- August, M. (2022). *The financialization of housing in Canada: A summary report for the Office of the Federal Housing Advocate* (pp. 1-48, Rep.). The Office of the Federal Housing Advocate.
<https://www.homelesshub.ca/resource/financialization-housing-canada-project-summary-report>.
- August, M., & Walks, A. (2018). Gentrification, suburban decline, and the financialization of multi-family rental housing: The case of Toronto. *Geoforum*, 89, 124-136.
DOI:10.1016/j.geoforum.2017.04.011
- Calgary Housing, Affordable Housing. (2022). *What we heard: Community engagement and research report. Understanding the affordable housing needs of Indigenous Calgarians: By Indigenous people for Indigenous people* (pp. 1-65, Rep.). Calgary, Canada: City of Calgary.
<https://pub-calgary.escribemeetings.com/filestream.ashx?DocumentId=209652>.
- Canada Mortgage and Housing Corporation. (2018a). About Affordable Housing in Canada. Retrieved from <https://www.cmhc-schl.gc.ca/en/professionals/industry-innovation-and-leadership/industry-expertise/affordable-housing/about-affordable-housing/affordable-housing-in-canada>
- Canada Mortgage and Housing Corporation. (2018b). Social Housing Programs. Retrieved from <https://www.cmhc-schl.gc.ca/en/about-us/social-housing-information/social-housing-programs>
- Canada Mortgage and Housing Corporation. (2021). *What We Heard. The Unique Housing Needs of Women, CMHC Engagement With Women: Results From 2019 Engagement Sessions and Online Survey* (Rep.). Retrieved from <https://assets.cmhc-schl.gc.ca/sites/place-to-call-home/pdfs/women-engagement-sessions-en.pdf>

- Canada Mortgage and Housing Corporation. (2022a). *Housing Supply Report. Canadian Metropolitan Areas*. (Rep.). Retrieved from https://assets.cmhc-schl.gc.ca/sites/cmhc_professional/housing-markets-data-and-research/market-reports/housing-supply-report/housing-supply-report-2022-11-en.pdf?rev=74c50e35-d0a7-4131-b6a5-5829967ed5d1
- Canada Mortgage and Housing Corporation. (2022b). The National Housing Strategy Glossary of common terms. Retrieved from <https://www.cmhc-schl.gc.ca/en/nhs/guidepage-strategy/glossary>
- Canadian Housing and Renewal Association. (2014). *Affordable Housing Challenges & Innovations in the North* (pp. 1-4, Rep.). Ottawa: Canadian Housing and Renewal Association (CHRA). <https://www.bchousing.org/research-centre/library/housing-affordability/affordable-housing-challenges-innovations-north>.
- City of Edmonton. (2021). *GBA+ & Equity Toolkit. Community Conversations Summary* (pp. 1-20, Rep.). Edmonton, Canada: City of Edmonton. https://www.edmonton.ca/sites/default/files/public-files/assets/PDF/ZoningBylawRenewal_GBA_Equity_CommunityConversations.pdf?cb=1624605774.
- City of Edmonton. (2023). Equity and the Zoning Bylaw. Retrieved from https://www.edmonton.ca/city_government/urban_planning_and_design/equity-and-the-zoning-bylaw
- City of Vancouver. (2022). *City of Vancouver Housing Needs Report April 2022* (pp. 1-88, Rep.). Vancouver, British Columbia: City of Vancouver. <https://vancouver.ca/files/cov/pds-housing-policy-housing-needs-report.pdf>.
- Dreier, P., & Hulchanski, J. D. (1993). The role of nonprofit housing in Canada and the United States: Some comparisons. *Housing Policy Debate*, 4(1), 43-80. DOI:10.1080/10511482.1993.9521124
- Drummond, D., Burleton, D., & Manning, G. (2004). Affordable Housing in Canada: In Search of a New Paradigm. In J. D. Hulchanski & M. Shapcott (Eds.), *Finding room: Options for a Canadian rental housing strategy* (pp. 15-68). Toronto: CUCS Press, Centre for Urban and Community Studies, University of Toronto.
- Fields, D. (2015). Contesting the financialization of urban space: Community Organizations and the struggle to preserve affordable rental housing in New York City. *Journal of Urban Affairs*, 37(2), 144-165. DOI:10.1111/juaf.12098
- Gabarre, M. (2022). *Housing financialization: The international landscape* (pp. 1-54, Rep.). The Office of the Federal Housing Advocate. <https://www.homelesshub.ca/resource/housing-financialization-international-landscape>.
- Government of Canada. (2017). *Canada's National Housing Strategy* (pp. 1-39, Publication). Government of Canada. <https://www.placetocallhome.ca/-/media/sf/project/placetocallhome/pdfs/canada-national-housing-strategy.pdf>.

- Government of Canada. (2023, February 17). Consolidated federal laws of Canada, National Housing Strategy Act. Retrieved from <https://laws-lois.justice.gc.ca/eng/acts/N-11.2/page-1.html#h-1168988>
- Government of Nova Scotia. (2021). Crown Land | Frequently Asked Questions. Retrieved from <https://novascotia.ca/natr/land/faq.asp#Q6>
- Government of Ontario. (2018). 5. Municipal Organization: The Ontario Municipal Councillor's Guide. Retrieved from <https://www.ontario.ca/document/ontario-municipal-councillors-guide/5-municipal-organization#section-0>
- Government of Ontario. (2019). Zoning bylaws: Citizen's guide to land use planning. Retrieved from <https://www.ontario.ca/document/citizens-guide-land-use-planning/zoning-bylaws#section-12>
- Government of Yukon. (2023). *Investment in Building Construction, December 2022* (pp. 1-2) (Canada, Yukon Bureau of Statistics, Department of Finance). Yukon Bureau of Statistics. <https://yukon.ca/en/investment-building-construction-december-2022>.
- Hulchanski, J. (2006). What Factors Shape Canadian Housing Policy? The Intergovernmental Role in Canada's Housing System. In R. Young & C. Leuprecht (Eds.), *Canada: The State of the Federation 2004. Municipal-Federal-Provincial Relations in Canada* (pp. 221-247). McGill-Queen's University Press.
- Indigenous Housing Caucus Working Group. (2018). *A For Indigenous by Indigenous National Housing Strategy* (pp. 1-30, Rep.). Canadian Housing and Renewal Association (CHRA). https://chra-achru.ca/wp-content/uploads/2015/09/2018-06-05_for-indigenous-by-indigenous-national-housing-strategy.pdf
- Jones, A., & Teixeira, C. (2015). Housing Experiences of Single Mothers in Kelowna's Rental Housing Market. *Canadian Journal of Urban Research*, 24(2), winter 2015, 117-137. <https://www.jstor.org/stable/26195294>.
- Kalman-Lamb, G. (2017). The financialization of housing in Canada: Intensifying contradictions of neoliberal accumulation. *Studies in Political Economy*, 98(3), 298-323. DOI:10.1080/07078552.2017.1393911
- Mah, J., & Hackworth, J. (2011). Local Politics and Inclusionary Housing in Three Large Canadian Cities. *Canadian Journal of Urban Research*, 20(1), summer 2011, 57-80. <https://www.jstor.org/stable/26193840>
- McDonough, A., & Wekerle, G. (2011). Integrating Cultural Planning and Urban Planning: The Challenges of Implementation. *Canadian Journal of Urban Research*, 20(1), 27-51. <https://www.jstor.org/stable/26193854>
- Millward, H. (2002). Peri-urban residential development in the Halifax Region 1960–2000: Magnets, constraints, and planning policies. *The Canadian Geographer/Le Géographe Canadien*, 46(1), 33-47. DOI:10.1111/j.1541-0064.2002.tb00729.x

- Province of British Columbia. (2021a). Housing and Regional Growth Strategies. Retrieved from <https://www2.gov.bc.ca/gov/content/housing-tenancy/local-governments-and-housing/policy-and-planning-tools-for-housing/housing-and-regional-growth-strategies>
- Province of British Columbia. (2021b). Housing needs reports. Retrieved from <https://www2.gov.bc.ca/gov/content/housing-tenancy/local-governments-and-housing/policy-and-planning-tools-for-housing/housing-needs-reports>
- Province of British Columbia. (2023a). Official community plans for Local Governments. Retrieved from <https://www2.gov.bc.ca/gov/content/governments/local-governments/planning-land-use/local-government-planning/official-community-plans>
- Province of British Columbia. (2023b). Regional districts in B.C. Retrieved from <https://www2.gov.bc.ca/gov/content/governments/local-governments/facts-framework/systems/regional-districts>
- Statistics Canada. (2022, May 05). Building construction price indexes, first quarter 2022. Retrieved from <https://www150.statcan.gc.ca/n1/daily-quotidien/220505/dq220505b-eng.htm>
- Ville de Montréal. (2005). *Stratégie d'inclusion de logements abordables dans les nouveaux projets résidentiels* (Rep.). Montréal, Québec: Ville de Montréal. https://ville.montreal.qc.ca/pls/portal/docs/page/librairie_fr/documents/Strategie_inclusion.pdf.



**Housing Assessment
Resource Tools
(HART)**

hart.ubc.ca