

CSA PUBLIC POLICY CENTRE

Building Together: Improving Collaboration to Deliver More Affordable Housing

January 2023

CSA Public Policy Centre



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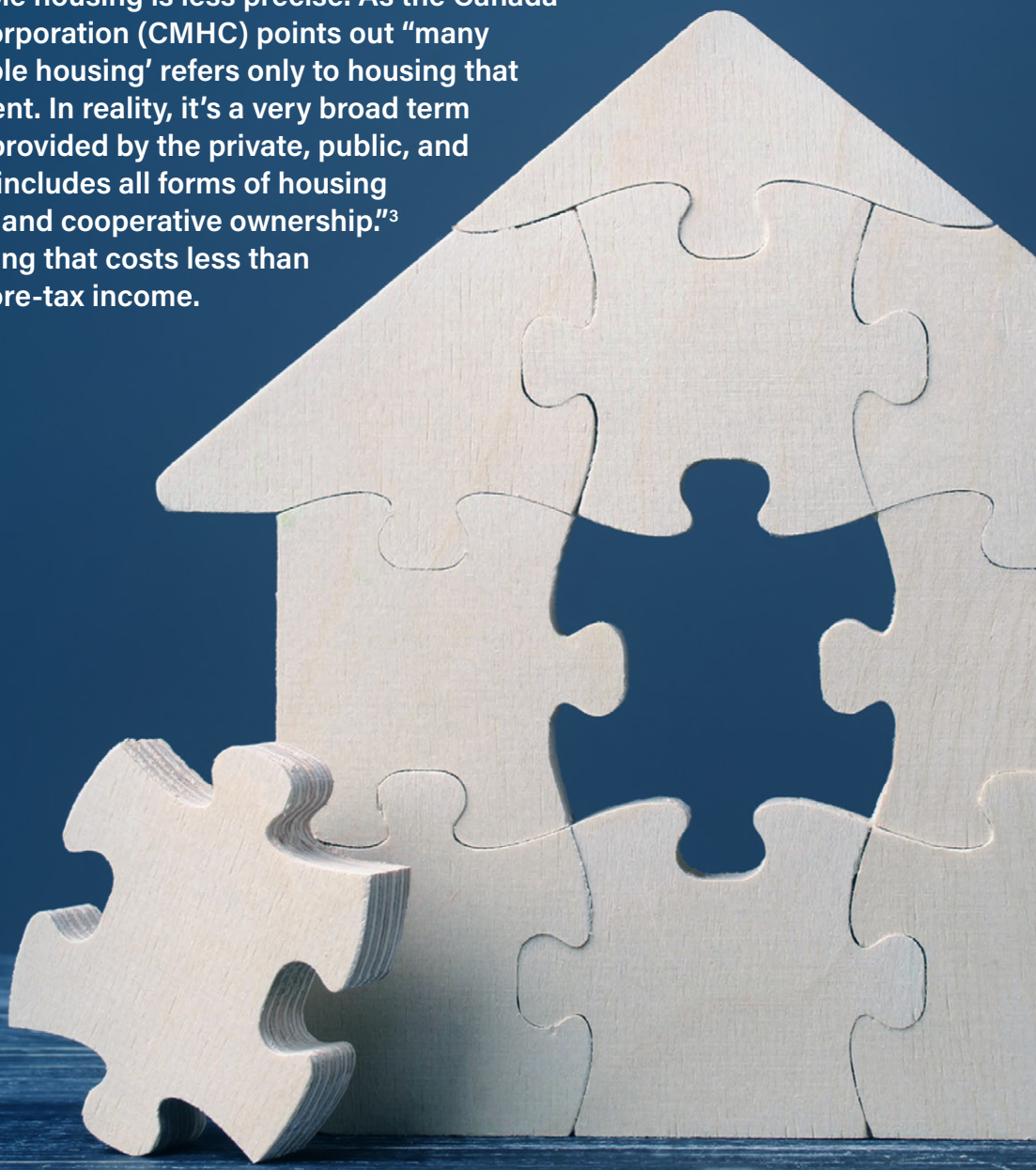
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Box 1: What do ‘core housing need’ and ‘affordable housing’ mean?

According to Statistics Canada, “core housing need refers to whether a private household's housing falls below at least one of the indicator thresholds for housing adequacy, affordability or suitability, and would have to spend 30% or more of its total before-tax income to pay the median rent of alternative local housing that is acceptable (attains all three housing indicator thresholds).”[2]

What is meant by affordable housing is less precise. As the Canada Mortgage and Housing Corporation (CMHC) points out “many people think that ‘affordable housing’ refers only to housing that is subsidized by government. In reality, it’s a very broad term that can include housing provided by the private, public, and non-profit sectors. It also includes all forms of housing tenure: rental, ownership, and cooperative ownership.”[3] It generally refers to housing that costs less than 30% of a household’s before-tax income.



Executive Summary

Canada has a housing supply issue. Among the G7, Canada has the lowest number of housing units per capita, which contributes to elevated housing costs across the country. This shortage is most acutely felt by lower-income households and those in "core housing need" (Box 1), who are underserved by current supply efforts – just one affordable unit is created for every five lost to redevelopment or rising rents.[1]

In 2017 the federal government introduced the National Housing Strategy (NHS) and legislated the right to housing to increase the supply of affordable housing, reduce housing need, and decrease homelessness. All levels of government have a responsibility to achieve the goals set out by the NHS and secure a supply of housing that is affordable to people across the income spectrum.

But while each level of government deploys different tools and powers towards achieving these objectives, their collective efforts may be often misaligned. Consequently, fragmented solutions and missed opportunities continue to constrict the availability of affordable options, particularly for lower-income households.

Achieving the goals and obligations under the NHS will require long-term, coordinated commitment from all levels of government. Furthermore, plans to increase the housing supply will have to accommodate climate change—a challenge that intersects with affordable housing issues—requiring even greater collaboration among decision makers who often pursue their goals in silos.

This paper examines where and how a lack of alignment and coordination among the three levels of government exacerbates the affordable housing shortage by creating inconsistencies, gaps, and barriers in approaches and, more importantly, results. It focuses on rental housing, for which demand has significantly expanded over the last decade, with the number of renter households growing twice as fast as owner households between 2011–2021.[4]

In keeping with the NHS's stated objectives, this paper identifies specific areas where better collaboration is required to generate more housing that is affordable to households with lower incomes. It also takes into account the opportunities to use housing policy to mitigate climate change, highlighting instances where suggested approaches can further carbon reduction goals. Specifically, the report recommends that governments should:

- apply a consistent, income-based, national definition of affordable housing;
- increase and preserve affordable housing through holistic acquisition strategies;
- maximize the impact of inclusionary zoning;
- make it easier for non-profit developers to build; and
- launch a trilateral mechanism to support strategic housing collaboration.

Methodology and Scope

This report was informed by a literature review and a series of expert interviews with key informants from the public, academic, and non-profit development sectors. It is focused on opportunities to develop and preserve rental housing that is affordable to low- and moderate-income earners, as well as supply-side actions. Demand-side interventions (e.g., rental assistance programs or adjusting social assistance rates) were not considered as part of this report.

Acknowledgements

We would like to thank Brittany Andrew-Amofah and Samantha DiBellonia for providing comments on an earlier draft. We would also like to thank the key informants who contributed their insights during the development of this paper.

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Just one affordable unit is created for every five lost to redevelopment or rising rents.

1. Introduction

In recent years, there has been significant policy momentum and investment in affordable housing by all levels of government. Yet despite these efforts, the number of Canadian households living in housing that is unaffordable or inadequate for their needs remains high—roughly 1 in 10 reside in what is known as "core housing need."[5]

A key reason for this, according to governments, is that Canada has a housing shortage. Among the G7, Canada has the lowest number of housing units per capita, a trend that has been worsening since 2016.[6] A recent report by the Canada Mortgage and Housing Corporation (CMHC) also indicated that, on top of the 19 million housing units projected for completion by 2030, a further 3.5 million are needed to attain greater affordability.[7]

While more housing is indeed required to moderate prices and improve affordability, there is a particular need to ensure a sufficient stock of housing that is affordable to households with lower incomes and residing in core housing need. This segment of the population remains underserved by housing supply efforts, which are producing just one affordable unit for every five that are lost to redevelopment or rising rents.[8]

In 2017, in recognition of concerning housing availability trends, the federal government introduced the National Housing Strategy (NHS). Later enshrined in the *National Housing Strategy Act 2019,* the NHS sets targets to significantly reduce housing need and cut chronic homelessness by 50% by the end of this decade, while also legislating the right to adequate housing for all Canadians for the first time.

All levels of government have a responsibility in ensuring the right to housing is realized and in securing a supply of housing that is affordable to people across the income spectrum. But while each level deploys different tools and powers towards this goal, their collective efforts are too often misaligned, contributing to fragmented solutions or missed opportunities that ultimately limit the availability of affordable housing options.

Ensuring the obligations under the NHS are met will require long-term, coordinated commitment from all levels of government. Furthermore, plans to increase the housing supply will have to accommodate climate change to ensure the achievement of Canada's targets for carbon reduction (see Box 2)—requiring even greater collaboration among decision makers who often pursue their goals in silos.

This paper examines four specific areas where a lack of alignment and coordination among the three levels of government exacerbates the affordable housing shortage by creating inconsistencies, gaps, and barriers to building housing. It focuses on rental housing, for which demand has significantly expanded over the last decade and which houses 66% of households in core housing need. It then describes five opportunities to enhance trilateral collaboration and stimulate a supply of affordable housing that aligns with NHS goals and priorities, while also taking into consideration alignment of the proposed approaches with Canada's climate change ambitions.



Box 2: Meeting the Affordable Housing and Climate Change Targets in Tandem

Housing affordability and climate change figure among the top concerns for Canadians, and there is a growing recognition that "failure to solve one crisis can make it difficult, if not impossible to solve the other."[9] Therefore, how governments at all levels address the housing supply challenge will impact Canada's goals towards achieving a net zero future—and vice versa.

For example, without the right policies in place, building more homes – which are needed to promote affordability – can lead to rising sprawl and further reliance on cars. But merely allowing more density in neighbourhoods with better access to transit can increase land and property values, thereby displacing lower-income residents.

In either case, those with the fewest means bear a disproportionate burden. For instance, lower-income households are more likely to live in locations prone to flooding and other adverse climate change impacts.[10] They are also more likely to live in substandard housing and struggle with higher energy costs[11] Meanwhile, attempts to retrofit aging buildings to achieve greater energy efficiency can also lead to unsustainable rent increases for lower income tenants.

Policy makers are only just beginning to understand and respond to the close connections between housing affordability and environmental sustainability. Where applicable, this reports highlights examples and approaches that illustrate this relationship and that support both affordable housing and climate resilience goals.

2. Affordable Housing Supply: A Multi-Faceted Challenge

The shortage of affordable housing in Canada is a multifaceted challenge driven by many interrelated factors, from historic policy decisions to global market dynamics. Chief among these was the federal government's retreat from the social housing space in the early 1990s, which at its peak contributed 25,000 new affordable units annually and accounted for 10% of all housing construction starts nationally.[12]

As Table 1 indicates, once the federal government devolved responsibility for funding new social housing to provinces and territories in the 1990s (which in some cases further devolved it to municipalities to varying degrees) the number of new units constructed declined significantly – by about 63% in the 29 years following the peak building period between 1970-1989.

Table 1: Declining Construction of Social and Affordable Housing Units, 1970–2019[13]

Year	1970–1989	1990–2019
Units constructed	**284,396**	**102,759**

The construction of purpose-built rental buildings—a source of naturally occurring affordable housing as properties age—also declined dramatically in the 1990s, further widening the gap of affordable housing options.[14] Though rental construction starts have accelerated in recent years, the effect of rising ownership costs and higher-income households remaining in rental properties for longer periods has further squeezed the availability of housing affordable to those with fewer means.[15]

The households that have been most negatively impacted by these shifts are those that rent. Renters, a fast-growing segment of the population that currently represents 33% of all households, comprise 66% of those in core housing need.[16] According to the most recent census, the number of renter households has grown twice as fast as owner households over the past ten years, yet policy efforts continue to largely favour owner households.[17] This, along with the fact that single individuals, seniors, people with disabilities, Indigenous



peoples, lone-parent households led by women, and racialized individuals are also more likely to experience housing need poses urgent equity issues.

Addressing these challenges and ensuring an adequate supply of affordable housing is a responsibility that falls on all levels of government. However, housing policy in Canada is a highly complex jig-saw puzzle, resting on numerous unilateral programs and bilateral and transfer payment arrangements, with each level of government holding different levers and powers that can either promote or hinder overall supply (see Figure 1).

As noted above, jurisdictional roles have evolved and continue to be redefined through the introduction of the $72 billion NHS in 2017, which signaled the federal government's re-engagement in affordable housing.

The NHS commits to advancing the right to housing in law and sets national targets to lift over half a million households out of core housing need and reduce chronic homelessness by half over a span of 10 years. Provinces and municipalities are essential partners in achieving these objectives, providing joint funding in the case of provinces, and serving as delivery partners in the case of municipalities (although larger municipalities do also contribute funding).[18]

Figure 1: Key Powers Held by Different Levels of Government Affecting Supply of Affordable Housing

Though specific arrangements and powers vary across provinces/territories, generally, the key roles and powers may be summed up as follows:

Federal	Provincial/Territorial	Municipal
		
Serves as a leader by setting the national housing agenda and by leveraging fiscal powers to fund, invest, and incentivize affordable housing development.	Has fiscal capacity to fund and invest in affordable housing development, holds land use planning and zoning powers, oversees building codes, and controls rent regulations.	Enacts zoning-by laws, levies or waives development fees and taxes, accelerates approvals for construction, and, in some cases, administers housing programs through licensing/registration bylaws.

Figure 2: Overview of NHS Key Objectives and Major Supply Programs[19]

Key Objectives

Remove 530,000 households from core housing need

Reduce chronic homelessness by half

Build 160,000 affordable homes

Major Supply Programs

$27.5 billion

Rental Construction Financing Initiative provides low-cost loans to developers of new rental housing.

$2.5 billion

Rapid Housing Initiative initiated at the start of the pandemic, provides grants to municipalities and local organizations for land acquisition, construction, and conversion of existing housing.

$13.8 billion

National Housing Co-Investment Fund provides a mix of low-cost loans and grants to support development and repair of affordable housing. Other sources of funding (i.e. from provincial/territorial governments or in-kind contributions) are required.

$3.5 billion

Reaching Home – provides funding to municipalities and local organizations to prevent homelessness, including through creation of temporary or permanent housing.



Another meaningful change brought about by the NHS is an evolution in fiscal federalism, with major programs like the Rapid Housing Initiative (RHI), Reaching Home, and most recently the Housing Accelerator Fund flowing funds directly to municipalities, bypassing traditional federal–provincial/territorial flows (which flow funds to provincial and territorial governments that then determine how to disperse funding to municipal governments). This, in combination with municipalities often seen as being on the front lines of the housing crisis, has led to a growing recognition of the crucial role municipal governments play in tackling housing affordability. However, though frequently consulted by upper levels of government, municipalities are only engaged at the will of their federal and provincial counterparts. They remain largely absent from Canada's intergovernmental relations systems, though they are increasingly involved in a growing number of critical policy areas, including housing.[20]

Meanwhile, despite these major policy and fiscal developments, those in need continue to face barriers in accessing an affordable and adequate home. According to the most recent census, although the number of households in core housing need has decreased since 2016, the change is in part attributed to pandemic-related income supports, which were made available during the census data collection period in 2020 and have now been terminated.[21] A recent report from the Parliamentary Budget Officer suggests, instead, that the number of households in need increased by 100,000 in 2021 and is expected to remain elevated in the coming years.[22]

Though not the cause of persistent affordable housing supply issues, the lack of effective alignment and coordination across levels of government is a significant factor. And in the absence of a foreseeable and substantial increase in social housing investment, relying on better collaboration to maximize current efforts is even more crucial.

3. Key Issues in Alignment and Coordination

The absence of a common foundation and failure to combine housing efforts and resources results in levels of government working at cross-purposes, missing important opportunities, and ultimately delivering fewer housing options for those in need. While fixing these issues alone would be insufficient in meeting current affordable housing needs, they represent key areas where governments, working together, can act collectively to safeguard and accelerate supply in the nearer term.

3.1 Inconsistent Definitions of Affordable Housing

The definition of affordable housing influences which Canadians are supported, how housing development is incentivized and targeted, and ultimately how success is measured. Most commonly, the definition used by CMHC and other levels of government is whether housing expenditures amount to less than 30 per cent of a household's income before taxes.

Table 2: Comparison of Affordable Housing Definitions in Toronto

	Affordable Rent Based on Average Market Rent	Revised Affordable Rent Based on Income (2021)
		
Bachelor	$1,221	$812
1-bedroom	$1,431	$1,090

A recent analysis of 'affordable housing' definitions used by provincial/territorial and large municipal governments however, does indicate a variety of definitions in use.[23] Other analyses have pointed out that the definition has evolved and become "fuzzier" since responsibility for social housing was devolved to provinces and has also expanded to include market-oriented rather than income-based measures.[24] As such, instead of being gauged by a households' ability to pay, affordability may instead be based on average market rent.

This presents two challenges. First, an inconsistent way of defining affordable housing makes it difficult to align efforts and resources towards a common goal across levels of government.

Second, the absence of a consistent income-based definition mistargets the households that are in greatest need of support. Market-based measures produce higher affordability thresholds, especially in hot housing markets, resulting in "affordable" units costing far above what is manageable for lower-income households.

For example, Table 2 demonstrates how a recent amendment to Toronto's Official plan, which moved away from average market rent to an income-based measure of affordability in 2021 has lowered the benchmark for affordable rent for bachelor and 1-bedroom units.[25] Making rentals more affordable for single individuals is particularly important as this group receives the least amount of income supports and experiences poverty at higher rates than the national average.[26]

Furthermore, measures defining affordability vary not only across jurisdictions, but within the same government programs. NHS supply programs apply different criteria, for example, "less than or equal to 30% of gross income" for the RHI, and "less than or equal to 80% average market rent" for the Rental Construction Financing Initiative (RCFI). The RCFI, the biggest supply program under the NHS, had its criteria updated in the 2022 budget to improve affordability, but the new rules have yet to be implemented.[27] Even so, in large urban areas such as Toronto or Vancouver where 1-bedroom apartments near the $2,000 mark, the new criteria would still yield unattainably high rents for lower-income households.

With the NHS's stated focus on reducing core housing need and achieving the right to housing for all Canadians, it is difficult to square the definition applied by RCFI—which accounts for nearly 40% of the NHS budget—with the NHS's goals.

Overall, the absence of a consistent definition of affordability poses fundamental challenges to assessing the kind of housing that is required, designing policies and program criteria to meet that need, and measuring progress. As section 3.4 discusses, conflicting affordability requirements can also generate barriers to housing development, further delaying and limiting the availability of affordable units.

3.2 Lack of Housing Preservation Strategy

Much of the public debate on closing the affordable housing gap focuses on how more units can be constructed more quickly. While this is clearly essential, less attention is paid to the other side of the supply equation—the preservation of existing stock.

During the previous census period, between 2011 and 2016, 322,000 affordable homes were lost, while just 60,000 were constructed over the same period—this amounts to a rate of loss of roughly five units for each one that was built.[28] While the same analysis from the most recent census shows a slowdown in the erosion of affordable housing, this is likely due to the fact that much of the most affordable stock has already disappeared, rather than as a result of a deliberate policy intervention.[29]

Affordable units are largely lost to redevelopment, demolition, and rising rents. Community housing providers and land trusts have had success in saving affordable properties, but the efforts are relatively small scale due to their limited resources. Also, while some jurisdictions have experimented with intergovernmental efforts to pool funding and acquire affordable properties at risk of being lost, the strategy is not widespread, and preservation remains an underdeveloped priority. Like many other areas of housing policy, preservation is not an explicit responsibility of any level of government, but each possess tools and powers it may deploy to reduce the loss of affordable housing.

3.3 Slow Zoning Reforms

In Canadian cities, typically 60–80% of land is zoned for single-family homes, referred to as the "yellow belt."[30] The effect is that large swaths of urban land remain off-limits to development of housing options that would increase density, which limits supply. This in turn contributes to rising housing costs, sprawl, increasing GHG emissions, and a lower quality of life for poorer households that are pushed out of neighborhoods with better access to transit, employment opportunities, and other amenities.[31]

Reforming exclusionary zoning policies that have produced yellow belts has significant potential to improve affordability and address housing equity by opening new areas of cities to development. More specifically, employing Inclusionary Zoning (IZ), which requires developers to set aside a portion of units as affordable housing, holds real promise.

Municipalities can affect such zoning changes, but provinces must first grant them the appropriate powers. While not inherently problematic, the arrangement can and has led to delays and lackluster results, depending on implementation and politics of the day.

For example, in Ontario, after initially supporting a more broad-based approach to IZ, the provincial government introduced legislation to limit its use to areas around major transit hubs. It required that cities identify those hubs and then receive approval from the province to implement IZ. This process has led to avoidable delays in Canada's largest city, where every year that IZ is delayed results in more than 3,000 foregone affordable units.[32] Most recently, through the introduction of Bill 23, the province has also proposed further limits on IZ, including shorter timeframes during which affordability is guaranteed and smaller amounts of floor space required to be set aside for affordable units.

3.4 Underleveraging Non-profit Developers

Non-profit real estate developers build housing that is stewarded by community organizations and seeks to retain affordability in the long term. In addition to securing affordability, non-profit developers might also work to meet the needs of underserved communities, such as through development of culturally appropriate Indigenous housing, accessible housing, and supportive housing for people with mental health and addiction issues.

Non-profit and for-profit developers alike must navigate a complex, cross-jurisdictional regulatory approvals process to bring projects to completion. However, due to limited resource capacity and access to expert knowledge, non-profit developers incur more delays and costs they may be unable to bear, risking the viability of their projects.[33]

Furthermore, housing programs designed by federal and provincial governments are "frequently misaligned and conflict with one another".[34] And local IZ by-laws may employ affordability criteria that diverge from definitions guiding federal and provincial programs.

This is a substantial barrier to affordable housing projects that often require access to multiple funding programs—a practice known as "stacking." This barrier generates uncertainty and unexpected costs; developers may forego such projects altogether. This in turn means that billions of dollars set aside by government for non-profit or other affordable housing developers go unspent, as a recent report from the Parliamentary Budget Officer highlighted.[35]

Additionally, given that all levels of government hold surplus lands that can be leveraged for affordable development by non-profits, an opportunity to be more strategic in systematically identifying and assembling land is also being missed.



Governments often make decisions related to housing that can lead to policy and program conflict and miss important opportunities to collaborate and increase supply of affordable housing.

4. Opportunities to Enhance Collaboration

As the alignment and coordination challenges discussed above show, governments often make decisions related to housing that can lead to policy and program conflict and miss important opportunities to collaborate and increase supply of affordable housing.

Below, five opportunities are presented that could accelerate and preserve the supply of affordable housing through better alignment and coordination among levels of government. The opportunities focus on rental housing that is affordable to lower-income households in need, which according to the human-rights based approach enshrined in the *National Housing Strategy Act,* should receive priority.[36] Where applicable, the contributions to climate change mitigation of these approaches are also highlighted.

4.1 Apply a Consistent, Income-based, National Definition of Affordable Housing

The various definitions of affordable housing not only impede governments' ability to work towards the shared goals stated in the NHS but also reverberate across a system of developers, non-profit housing providers, community organizations, and other groups that hope to find solutions to the shortage of affordable housing.

Therefore, the first step is to employ a consistent, income-based definition of affordable housing that is used to both set objectives and design program criteria across all jurisdictions. A consistent, simple, and replicable definition would better target resources, measure policy effectiveness, and compare efforts over time.[37] The definition might also take into account related costs, such as transportation, given that lower-income households may choose to relocate farther from job centres in order to spend less on housing, but end up incurring higher travel costs that offset any savings.[38]

Given the centrality of the NHS in driving inter-jurisdictional efforts to increase housing supply, the federal government should lead by example. Adopting a single, clear definition of affordable housing based on a household's ability to pay is an important start and would align better with the NHS's overarching goals of reducing core housing need and realizing the right to housing. More specifically, it could have profound effects for its flagship supply program, RCFI, which currently produces units that are affordable to just 3% of lower-income households.[39]

The Federal Housing Advocate, an independent office charged with monitoring progress on the NHS and realizing the right to housing, could be tasked with helping to develop an appropriate definition, building on its existing collaborative efforts across jurisdictions and sectors to track the impact of current affordable housing efforts. This definition should drive federal affordable housing policy and program criteria, which provinces and territories, and in turn municipalities, should be encouraged to adopt.

4.2 Increase and Preserve Affordable Housing through Holistic Acquisition Strategies

The demolition and redevelopment of aging rental housing has led to a significant decline of affordable housing options. As noted above, stemming affordable housing loss cannot be achieved by new supply alone—preservation is needed. However, no order of government has explicit responsibility for preserving the affordable rental stock, although each one holds levers that could support or hinder it.

For instance, the need for dedicated federal and/or provincial acquisition funds has been identified by municipalities and housing experts as an essential component of a preservation strategy.[40] Municipalities and community partners could use the funding to purchase properties at risk of demolition or redevelopment, and which currently do or could serve as affordable housing (see Box 3).

Box 3: Converting a Vacant Office Tower into Affordable Housing in Calgary's Downtown

In January 2022, Calgary's office space hit a record 33.2% vacancy.[41] With a third of the downtown core emptied, two local non-profits saw an opportunity to convert a vacant tower into much needed housing. Within a year of receiving the necessary approvals, HousingSpace and Inn from the Cold opened the Neoma in September of 2022, which includes 82 affordable housing units, 10 emergency family shelter spaces, and 10 transitional housing units, all with integrated support services on site.[42] The Neoma project is the first of its kind in Canada to be completed, but with many businesses relinquishing office space in the post-pandemic era, there is potential in encouraging non-profit housing providers to acquire commercial buildings through enabling policies that help them identify, secure, and convert appropriate properties for affordable housing.

Access to funding is a cornerstone of this approach but enabling legislation from the provinces and organizational capacity at the local level are needed to make it a reality.

To this end, in 2016, the Province of Quebec granted "right of first refusal" to the City of Montreal, which has allowed the city to identify some 300 properties that the municipality and non-profit housing providers will have the option to bid on first, once they become available for purchase.[43] While some of the identified properties have the potential to be turned into affordable housing, many are already home to very low-income and vulnerable residents who would face significant challenges in finding alternative housing options.[44]

Experience from the United States, where this practice is more widespread, has shown that acquisition strategies must account for the significant costs of renovation that usually accompany such purchases.[45] Furthermore, conditions on acquisition funding and subsequent repairs and retrofits should also be in place to prevent displacement of existing tenants.

Box 4: Affordable Housing Preservation and Climate Change Mitigation

The average building in Canada is made to last about 100 years. And with building construction and demolition accounting for roughly one-third of global material consumption and waste production[46] and about 40-50% of GHG emissions,[47] it makes sense that preserving the housing already built could support climate change goals while protecting housing affordability. However, older buildings also burn more energy and waste more water, requiring retrofits to improve efficiency. Though not always the case, needed investments could displace tenants if incurred costs are passed on to households that cannot afford them – these are important factors to account for within a preservation strategy that considers both climate change and affordability impacts.



Deploying inclusionary zoning can generate opportunities for needed housing, improve affordability, and promote social inclusion by requiring or encouraging below-market-rate units as part of new developments.

In all, preserving the existing stock of affordable rental housing and buildings suitable for conversion not only requires funding from higher orders of government, but also enabling policies and capacity at the provincial and municipal levels to ensure local entities are positioned to secure desired properties and that those in greatest need benefit.

Finally, while not the focus of this report, other policy levers held by the provinces, particularly the ability to enact rent control, vacancy decontrol, and set rules on conversions, have a significant impact on the erosion of affordable rental housing and should be considered as part of a larger preservation effort.

4.3 Maximize the Impact of Inclusionary Zoning

Many of the restrictive rules that created today's yellow belts are the result of decisions made decades ago when cities were smaller, mass transit was less widely available, and equity and climate concerns were not on policy makers' radar. Today, zoning cities in ways that severely restricts density makes far less sense and is at odds with building more affordable, equitable, and resilient communities.

In the US, a number of states and cities have taken action to eliminate single-family zoning, indicating that public understanding and opinion may be shifting in favour of less restrictive zoning policies. In Canada, too, recent recommendations from housing panels in Ontario and British Columbia have been implemented to ease exclusionary zoning as a means of generating more housing options and affordability.[48]

When done well, introducing more permissive zoning can result in affordability gains and it mainly requires political will. Deploying IZ can generate opportunities for needed housing, improve affordability, and promote social inclusion by requiring or encouraging below-market-rate units as part of new developments.

Box 5: Inclusionary Zoning—A Tool to Increase Affordability and Reduce GHG Emissions

Inclusionary Zoning avoids some of the pitfalls of simply allowing more density that could have limited impact on affordability or even drive up rents and displace lower-income tenants as neighbourhoods become more attractive and bring in more investment.[49] It can also situate affordable development in areas with better access to transit and jobs, reducing sprawl and reliance on vehicles that contribute to rising GHG emissions and higher commuting costs for lower-income households who would otherwise be pushed out.[50]



However, progress on IZ has often been slow and its impact minimized by either design or due to intergovernmental conflict. For instance, in a comprehensive study of 185 US-based IZ policies (which have been around for longer, while IZ is just emerging in Canada), just 12% were designed to produce some portion of their rental units in a range that would be affordable to lower-income earners, at around 50–60% of area median incomes.[51] In the case of Toronto cited above, the province narrowed where IZ could be implemented—thus reducing its potential for impact—and then delayed approval of zoning by-law amendments made by municipal authorities, leading to delays. However, the City of Toronto had also devised a policy that mandated lower set-aside rates[52] than what multiple feasibility studies suggested, and which would still have ensured healthy 15% profit margins for developers.[53]

The federal government can and does play an important role here, too, for example, by creating incentives through lending and grant programs to adopt IZ. Its Housing Accelerator Fund aims to (among other objectives) increase the capacity of municipalities to design and implement IZ and other system change initiatives to incentivize affordable market supply. Meanwhile, more heavy-handed options have also been suggested, such as making infrastructure funding contingent on amending zoning by-laws to allow for IZ.[54]

For the full benefits of IZ to be realized, all levels of government must act. The federal government should continue to create financial incentives and support capacity building, while the provinces should allow municipalities to enact IZ expeditiously. Provinces and municipalities should design and enact IZ policies and by-laws that provide deeper affordability while remaining financially motivating for developers.

4.4 Make it Easier for Non-profit Developers to Build

Building housing takes time, but the current interjurisdictional approvals process, marked by high degrees of complexity and conflicting requirements, contributes to a slower and more unpredictable pace of development.[55] While this negatively impacts all development, the consequences for non-profit developers who operate with fewer resources and capacities are more dire.

There is a clear opportunity to do better by introducing streamlined systems to fast-track housing projects, a priority acknowledged by the CMHC.[56] A potential solution advanced by the Canada-British Columbia affordable housing panel would be the creation of a digital development permitting system. This system could deliver two key functions: first, to serve as a central repository for all development requirements and restrictions administered by all levels of government, and second, to include a case management tool that supports developer proposals from start to finish.

This system could be developed and tested in a few jurisdictions and replicated across provinces and territories to meet their individual requirements. It would have the benefit of helping to accelerate all development, while being particularly valuable for non-profit projects. The Housing Accelerator Fund could potentially be used to advance this idea in a few test communities.

There is also an opportunity to encourage stacking of multiple housing funding programs by taking a more flexible approach to the requirements set by different levels of government. For example, developers who have met underwriting criteria set by the province should not have to meet another, sometimes more stringent, set of underwriting requirements set by a federal program for the same project.[57] Again, this would benefit both for-profit and non-profit developers.

Lastly, governments should be more strategic in combining efforts to identify and assemble their underutilized lands for affordable housing development. Land purchases are usually the biggest driver of construction costs. Providing free or low-cost land for non-profit developers and combining adjoining parcels held by different governments could increase the scale of projects. This can generate more affordable units and fill the supply gap more quickly.

While this type of collaboration does take place, it is generally ad-hoc. One of the structural challenges is the lack of easily accessible and publicly available information about where suitable and surplus lands exist. The HART project in British Columbia is working to change that by identifying well-located, publicly owned land to meet housing need (see Box 6). The project relies on scraping open-source data and working with government partners to fill in the gaps, but access to and quality of data varies across municipalities and provinces. In some cases, data is held in private systems, generating tens of thousands of dollars in retrieval costs.[58] For the tool to work at scale, greater data access, organization, and consistency is needed, which the CMHC can help achieve by continuing to support the tool's development.

Box 6: HART Land Assessment Tool

The Housing Assessment Resource Tools (HART) is an initiative led by BC Housing Research Collaborative, a team of housing experts based at the University of British Columbia. Within the toolkit is a Land Assessment Tool that identifies potential affordable housing sites by locating government or non-profit-owned land that is vacant or underutilized and that also meets social inclusion criteria, such as proximity to transit, medical services, and childcare.[59] The tool also takes into account environmental factors such as proximity to flood plains and pollution levels. Originally developed for the City Kelowna, the project is being expanded with the support of CMHC to include a dozen pilot communities across Canada.

Importantly, once suitable land is identified, strategies should be in place to proactively encourage land assembly where the potential exists, as well as ensure affordability is a priority. This could be achieved, for example, by pre-zoning the land for IZ or requiring that any commercial or residential projects possess an affordable housing component. Non-profit developers could also be prioritized by being offered discounted or free land, or the chance to bid first.

4.5 Launch a Trilateral Mechanism to Support Strategic Housing Collaboration

Decisions on one of the most fundamental contributors to Canadians' wellbeing—their homes and ability to live in dignity—take place within a multilevel system of governance that too often works against itself and yields results too slowly, especially for those in greatest need. And as the examples throughout this report demonstrate, while lack of intergovernmental coordination is not necessarily the primary cause, it is a substantial factor exacerbating the shortage of affordable housing.

Presently, there is no mechanism that formally engages all three levels of government on housing issues. This is a product of Canada's federal system, which is designed around federal–provincial/territorial relations, with municipalities falling under provincial jurisdiction. Though municipalities are frequently consulted and associations like the Federation of Canadian Municipalities play a crucial role in bringing the local perspective to upper levels of government, there is no obligation to include municipalities in discussions and decision-making processes. This is a "fragile foundation" on which to build productive intergovernmental relations and collaboration to solve one of the country's most pressing challenges.[63]

A mechanism that engages all three levels on critical housing strategy and decisions could, at the very least, help reduce conflict between levels of government by providing a platform where trust can be built. Durable, rules-based encounters help to build productive relationships among public leaders who, when encountering counterparts at other levels routinely, are more likely to work towards shared, longer-term goals.[64]

But the trilateral mechanism has the potential to do more, including bringing focus to where governments are working at cross-purposes, supporting the development of coordinated data and evaluation strategies, identifying, and scaling best practices

Box 7: A Note on Indigenous Housing

Though outside the scope of this analysis, a few important considerations bear mention with respect to the role of Indigenous peoples and government in tackling Canada's affordable housing challenges. Firstly, Indigenous peoples, who make up 5% of the overall population, are overrepresented among those experiencing core housing need and homelessness. In major cities, between 10% and 38% of people experiencing homelessness are Indigenous.[60] And although the NHS includes programs that target the needs of on-reserve communities, more than 80% of the Indigenous population resides in cities, towns, and remote areas and is not being adequately supported by current programs. [61]

Since the introduction of the NHS, Indigenous housing advocates, builders, and other experts have called for the development of a federally resourced and Indigenously-led Urban, Rural, and Northern (URN) strategy. This distinct strategy would address the unique housing needs of Indigenous communities by providing culturally appropriate wraparound supports and targeted homelessness prevention programs. It would also establish a National Housing Centre, which would act as a representative governance structure, and serve to collect better data, conduct evaluations, and overall manage and monitor the URN's investments and outcomes.[62]

The federal government, which has previously committed to filling this gap in the NHS, should expedite the development of a URN Indigenous housing strategy that follows the 'For Indigenous, By Indigenous' principle. Such action would align with Canada's renewed commitment to a nation-to-nation relationship with Indigenous peoples and uphold the inherent right of Indigenous self-government.

(see Box 8), creating new tools, and improving accountability frameworks. Working in closer collaboration would also give policy makers a better view of emerging challenges and help connect the dots between housing affordability and intersecting issues and goals such as climate change mitigation and resilience.

Two potential options for a trilateral mechanism suggested by the Institute on Municipal Finance and Governance could be explored.[70] The first would be the creation of a housing-specific trilateral council, which could be achieved by opening up existing Federal-Provincial-Territorial tables to municipal participation. Alternatively, a general trilateral council could be created by reforming the structure of the First Minister's meetings to not only include municipalities, but also ensure meetings happen regularly and agendas are jointly created. This kind of "institutionalization" is important to establishing norms and routines and helping promote more positive intergovernmental relations.[71]

Either option would allow all levels of government to identify shared priorities and systemic gaps and coordinate on potential solutions. But regardless of the mechanism in place, a few key considerations should guide its development.



Box 8: Trilateral Collaboration to Secure Modular Housing

In March of 2022, a new 400-unit affordable housing site was announced in Toronto's Parkdale community, dedicated to housing vulnerable populations, including people with disabilities, women, seniors, Indigenous peoples, racialized individuals, and those experiencing or at risk of homelessness.[65] The first phase of construction is now underway with the development of 51 modular homes, which can be built more quickly and at a lower cost than traditional construction. Furthermore, with modules produced off-site on a controlled assembly line and then assembled efficiently on-site, modular construction has been hailed for producing upwards of 45% less carbon emissions than traditional methods.[66]

The project hinged on effective collaboration across levels of government: most of the funding was made possible through the federal RHI, development approvals were expedited through a Minister's Zoning Order (MZO) at the provincial level, and the city secured a partnership with the local hospital and social services sector that provided land as well support services to residents.[67] Meanwhile, a similar project in the city—also seeking to build modular housing for vulnerable residents using the same federal envelope—has faced significant delay in absence of an MZO,[68] underscoring the importance of careful trilateral coordination to support the viability of innovative housing projects and expedite them.

Additionally, given the speed at which modular construction can deliver both more environmentally friendly and affordable homes, its uptake should be encouraged. Currently, an inconsistent regulatory landscape of national and provincial building codes, as well as local by-law variations, contribute to a slow and complicated approvals process for this promising construction method.[69]



The housing Canadians need—housing that is affordable to more households, that is equitable, and promotes climate resilience—is unlikely to materialize without greater coordination of efforts and resources among levels of government working towards clearer goals.

First, the work of a trilateral mechanism on housing should be, like the NHS, centered on upholding housing as a human right, which would help ground and guide its focus and actions towards ensuring a supply of housing that is affordable for those in greatest need.

Second, for the mechanism to succeed, it should be permanent, be well-resourced, and adopt best practice principles, including regular meetings, establishment of a secretariat and supporting working groups—including individuals with lived experience of housing need— and allow for shared leadership among levels of government.[72] A joint research program could also help to inform evidence-based approaches in areas such as IZ and acquisition strategies, as well as a host of other issues where greater alignment is needed.

Finally, how municipalities are represented at a trilateral forum should be considered. Suburbs around city centres are expanding rapidly, and many people live in or access important services in one area, while commuting to jobs in another. Housing issues therefore play out at the city–region level, but few places engage in joint governance on the associated challenges. While there have been successes in establishing mechanisms for regional governance in areas like transit and economic development, less focus has been placed on regional collaboration on housing. As such, although there is an obvious need for greater collaboration among levels of government, more structures supporting region-based coordination may also be necessary.[73]

5. Conclusion

The housing Canadians need—housing that is affordable to more households, that is equitable, and promotes climate resilience—is unlikely to materialize without greater coordination of efforts and resources among levels of government working towards clearer goals.

In keeping with NHS's stated objectives to decrease housing need and realize the right to housing, this report has identified specific areas where better alignment and collaboration is required to generate and preserve more housing affordable to households with lower incomes. It also acknowledges the opportunities to link housing and climate change mitigation and highlights approaches and examples that further governments' carbon reduction goals.

Specifically, the report recommends expanding and preserving existing stock through acquisition strategies, maximizing the impact of IZ, and making it easier for non-profit developers to build. It suggests that these efforts should be underpinned by a consistent, income-based definition of affordable housing to orient policy efforts more directly towards helping those in greatest need. Further, a trilateral mechanism is recommended to help establish shared priorities, reduce intergovernmental conflict, scale innovative practices, and develop stronger policy linkages with intersecting issues, notably climate change.

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