Purpose-Built Rental (PBR) Housing in Metro-Vancouver

A Literature Review on Policies Implemented, the Barriers to its Delivery and the Policy Solutions

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Executive Summary

A lack of rental housing choices in Metro Vancouver has contributed to a housing crisis in the region. A siloed and comprehensive approach to addressing these issues leads to debate and mixed messages. Further, private developers that produce the majority of new rental units are facing the pressures of increased land, material, and labour costs, as well as municipal, provincial, and federal charges which cut into the viability of building the much-needed rental stock. Recognizing the need for stakeholders in the sector to work collaboratively towards meaningful policy change, the UBC Housing Research Collaborative in partnership with WesGroup seeks to organize a Housing Summit in the fall of 2023. The purpose of the summit is to address policy gaps by bringing stakeholders together to share perspectives, learn and find common ground, with a focus on purpose-built rental (PBR) housing in Metro Vancouver.

There has been a lot of research/reports from different organizations and with different lenses on the policy gaps. This report reviews the literature to date that looks at PRB housing policies in Metro Vancouver, the barriers to its delivery, and the policy solutions (recommendations that have been addressed and not addressed). The aim is to lay the groundwork for the summit, including framing the issues of discussion.

Several policies have been implemented to improve the delivery, access, and security of rental housing in Metro Vancouver. Policies that aim to **create and/or increase the supply of rental housing (PBR)** include the Rental 100 Program, Inclusionary Zoning (Inclusionary Housing Policy), Moderate Income Rental Housing Pilot Program (MIRHPP), and the Affordable Housing Choices Interim Rezoning Policy (AHCIRP). There are also policies such as the Rental Housing Stock Official Development Plan, Empty Homes Tax (EHT) and Underused Housing Tax (UHT), and Single Room Occupancy (SROs) Initiative that aim to **protect the existing housing stock and add more units to the rental pool.** Furthermore, there are policies that have been implemented to **cut the cost of new rental housing development.** These include waivers on Development Cost Charges (DCCs) and Development Cost Levies (DCLs), and exemption from Community Amenity Contributions (CACs). **Financing models for rental housing development** in the region also include the CMHC Housing Accelerator Fund (to be launched in the summer of 2023) and the Vancity Financing Model.

Notwithstanding the implementation of these policies, there are several barriers to rental housing (PBR) delivery in Metro Vancouver. These include high land costs and exclusionary zoning that limit PBR housing development in certain areas. Others include tax policies that make new rental buildings unattractive and a very poor investment (lower profit margins), lengthy and unpredictable approval processes, and community resistance to higher density and PBR projects (nimbyism) in certain areas, among others. The development community (e.g., UDI) and others, including consultants, researchers, and advocates, propose that cities **make land available for rental housing development, and make it an attractive investment** by stopping exclusionary zoning, eliminating DCCs, implementing a cap on Development Charges, and restoring "rollover" provisions and GST exemptions. Other proposals include **streamlining development approval processes:** that is, establishing standardized and predictable development approval timelines and processes, and incorporating pre-zoning into Official Community Plans (OCPs). **Land Value Capture (LVC) and Low-Income Housing Tax Credits (LIHTC)** have also been identified as models to finance rental housing development in the region.

Other policy proposals to improve rental affordability and protect tenants' rights include temporary rent freeze, need-based refundable tax credit, B.C.-wide Rent Bank System for low-income renters, re-implementing vacancy control, stopping renovictions, eliminating security deposits, empowering the Residential Tenancy Branch, increasing grace period for late payment of rent, and preventing discrimination against tenants with children and pets, as well as regular auditing of tenant application processes.

1. Introduction

This report reviews the literature on purpose-built rental (PBR) housing in Metro Vancouver, regarding policies that have been implemented to date, the policy gaps (barriers to its delivery), and recommendations (policy solutions). The purpose is to help frame the issues of discussion for the Metro Vancouver Housing Summit 2023. The summit aims to bring together stakeholders within the housing sector (including municipal, provincial, and federal leaders, non-profit housing providers, private developers, national banks and housing advocacy groups) to share perspectives, teach, learn, and find common ground on how to address the rental housing crisis in the region.

The report is organized into four (4) parts. The first section presents issues or topics of interest that are shaping rental housing policies and/or discussions. The second presents policies implemented in Metro Vancouver that, in one way or another, influence the delivery of purpose-built rental (PBR) housing and its access and rights. The third presents the policy gaps (barriers to rental housing delivery), and the policy solutions— i.e., recommendations to address the barriers tabled. The final section presents general policy gaps and solutions for rental housing access and rights protection.

2. Topical Issues Shaping Rental Housing Policies and Discussions

A growing number of metropolitan households have become renters since the Great Recession, and the rental market continues to be where the majority of immigrants and low-income families find their housing (Besbris et al., 2021; Ellen and Karfunkel, 2016; Schachter and Besbris, 2017). Governments, policymakers, and researchers are therefore looking for means to promote access to safe, secure, and affordable rental housing for individuals and families, regardless of their income or social status. Topical issues that are currently shaping rental housing policies and discussions, including PBR include:

i. Accessibility and/or Affordability: how to make rental housing more affordable for low- and middle-income households. This has led to discussions on rent control or stabilization, tax cuts, incentives, and other measures that can help address housing delivery and affordability (Pomeroy, 2001; Pomeroy and Maclennan, 2019; Ontario Housing Affordability Task Force, 2022).

ii. Homelessness (Streetism): This is a growing issue in many parts of the world, particularly in major cities, and policymakers are increasingly focused on ways to provide affordable housing to those who are homeless (living on the streets) or at risk of becoming homeless (Farha, and Kaakinen, 2020).

iii. Sustainable Housing: Cities are increasingly recognizing the need for sustainable housing and are devising policies that improve the overall [energy] efficiency of rental housing (Pomeroy, 2015).

iv. Financing Models: Governments, cities, and policy-makers are looking for several financing tools available to support affordable rental housing development or address the shortage of rental housing, which is driving up prices and making it more difficult for low- and middle-income people to find affordable homes. In addition, access to credit is a major issue for many people who want to rent a home. Policymakers are looking at ways to make it easier for renters to access credit, including the use of alternative credit scoring models (World Economic Forum, 2019).

v. Tenant Rights: There is a growing concern about the rights of tenants and their ability to protect themselves from eviction, discrimination, and other forms of rental housing insecurity. Governments, housing advocate groups, and tenant associations are looking at means to address these concerns and provide greater protections to renters (BC Rental Housing Task Force, 2018)

3. Improving the Delivery, Access, and Security of Rental Housing (PBR) in Metro Vancouver

In response to the crisis in rental housing supply and the difficulty in accessing adequate and affordable housing in Metro Vancouver, several policies have been implemented to increase the delivery, access, and security of rental housing. Furthermore, there are policies that cut into the viability of developers building the much-needed new rental stock. This section reviews policies implemented in the region that, in one way or another, influence the supply of rental (PBR) housing, its access and security of tenure.

3.1 Creating and Increasing the Supply of Rental Housing (PBR)

3.1.1 Rental 100 Program

In May 2012, the city of Vancouver launched the Rental 100 program (also known as Secured Market Rental Housing Policy) to encourage the development of projects where all the residential units are rentals. Rental 100 was developed based on lessons learned from the Short Term Incentive for Rental Housing (STIR) program, developed in 2009 in response to the shortage of market rental units in the city (Metro Vancouver, 2012). In other words, the program was designed to create market rental housing to address the critically low vacancy in Vancouver – averaging 0.9% over the last 30 years – which has resulted after decades of little or no construction (City of Vancouver, 2019c). Before the Rental 100 Program, ownership housing accounted for 89% of the housing starts between 2007 and 2012. This was because condo developments which make the majority of ownership housing starts were more profitable, allowing condo developers to pay more for the land in the market than rental developers. Rental 100 thus provides incentives – development cost levy (DCL) waiver, parking requirement reductions, relaxation of unit size to 320 square feet, and additional density beyond what is available under existing zoning for rental projects requiring rezoning – to close the economic gap, making rental development a viable option (City of Vancouver, 2019c; Metro Vancouver, 2012). Since the program was approved, rental housing production has increased, accounting for 36% of all housing starts with a commensurate reduction in ownership starts to 64% (2013 – 2018) (City of Vancouver, 2019c).

3.1.2 Inclusionary Zoning (Inclusionary Housing Policy)

Inclusionary Zoning (IZ) practices use the planning system and development regulations to engage private developers in providing affordable housing (CMHC, 2017). It requires developers to include a specified proportion of units, typically between 10–20%, in a new residential or market housing development as affordable (Focus Consulting Inc., 2016; CMHC, 2017). In return, developers may be offered incentives such as increased density and development fee reduction or waiver, among others. Vancouver, Montréal, and Toronto have formally enacted inclusionary housing policies. Several others including Victoria, Richmond and Langford, B.C. and Edmonton, Manitoba, Ontario, and Alberta have adopted or are in the process of authorizing inclusionary zoning through amendments to their planning acts (CMHC, 2017). At present, inclusionary housing policy in many cities encourages new affordable housing via rental or homeownership in large strata developments seeking additional density (City of Victoria, 2019; City of New Westminster, 2022). It has been reported that the impact of the inclusionary zoning approach in Vancouver (voluntary) has been minimal. That being said, the policy has achieved over 2,500 units (Focus Consulting Inc, 2016). In the United States, inclusionary zoning is largely mandatory and has been used extensively to create hundreds of thousands of affordable housing units. The BC General Employees' Union (BCGEU, 2018) thus recommends that city and/or local governments should mandate inclusionary zoning in all new developments.

3.1.3 Moderate Income Rental Housing Pilot Program (MIRHPP)

The MIRHPP is a limited pilot program (up to 20 rezonings for new buildings) launched by the City of Vancouver in 2017 with the aim of incentivizing the development of new below-market rental housing across the city. The program ensures that a proportion of the rental units created are secured at affordable rates and made available to moderate-income households (City of Vancouver, 2019a; Chan, 2019). Specifically, MIRHPP ensures that 100% of residential space in a project is secured rental housing, with at least 20% of the residential floor area designated for moderate-income households earning between $30,000 and $80,000 annually (Chan, 2019). In exchange for providing such units (below-market rents), MIRHPP provides developers with incentives such as additional height and density, development cost levy waiver, parking requirement reductions, relaxation of minimum unit size and configuration requirements, and expedited application processing (City of Vancouver, 2019a).

On November 26, 2019, Council extended the timeline of MIRHPP until January 1, 2021. This means that for a developer to be eligible to be invited to proceed with a rezoning application under the MIRHPP, applicants must have received a response in a written letter, stating that their application would be considered by January 1, 2021. Currently, rezoning enquiries and applications made under MIRHPP is ongoing. Once the program proceeds, City staff will review the outcomes, report lessons learned to

Council, and potentially recommend a new program to enable and encourage the construction of more moderate-income rental housing (City of Vancouver (2019a). There are similar programs in cities across the lower mainland, Canada, and internationally that aim to increase affordable rental housing delivery. These include Richmond, BC – Low-End Market Rental (LEMR), North Vancouver, BC – Mid-Market Rental (MMR), Toronto, ON – Open Door Affordable Housing Program (OSAHP), and Seattle, WA – Mandatory Housing Affordability (MHA) (The Seattle Times, 2022; City of Toronto, 2018; City of Vancouver, 2019a).

3.1.4 Affordable Housing Choices Interim Rezoning Policy (AHCIRP)

The City of Vancouver (CoV), in an effort to increase the supply of affordable housing, approved the AHCIRP to allow for consideration of rezoning proposals. This policy is an interim measure, aimed at meeting the new Housing Vancouver targets for purpose-built rental housing—20,000 units within 10 years (2018-2027) (Naamani, 2022, City of Vancouver, 2018b). Proposals from developers are evaluated based on Affordability, Location, and Form of Development criteria. Thus, applicants are expected to demonstrate their ability to maximize affordability in the proposed development, and for the project to be considered, it must meet one of the following affordability criteria: 100% of the residential floor space is rental housing, units are sold for at least 20% below market value and include a secure mechanism for maintaining that level of affordability over time, innovative housing models and forms of tenure such as co-housing, and a Community Land Trust model is employed to secure increasing affordability over time (City of Vancouver, 2018b).

In December 2019, Council received an application for a new development at 7280 Fraser Street, from Spire Development and Cornerstone Architecture. The proposed project is a 6-storey mixed-use development including 95 secured market rental units and commercial use. The application was approved in December 2020, but nearly 3 years later, shovels have yet to break ground and the existing building is yet to be demolished for the development to commence (Naamani, 2022). For a full list of projects or applications that have been approved, in review, and in public consultation since AHCIRP was launched, visit the City of Vancouver website.

3.2 Protecting the Existing Housing Stock and Adding Units to the Rental Pool

2.2.1 Rental Housing Stock Official Development Plan

On June 5, 2018, the City of Vancouver Council approved the Rental Housing Stock ODP, as well as further amendments approved on November 5, 2019, January 20, 2021, and April 27, 2021. The intent of the Rental Housing Stock ODP is to prevent the loss of rental housing units through the demolition of existing rentals without replacement (City of Vancouver, 2022a). Rental replacement projects resulting in a new market rental development, where 100% of the residential development is rental in tenure, are eligible for a Development Cost Levy (DCL) waiver. The Rental Housing Stock ODP has been successful in protecting against the loss of the city's crucial existing rental supply. Approximately 53,500 units of rental housing are protected under the Rental Housing Stock ODP, or 77 percent of the total rental stock. Currently, Vancouver leads the region in terms of net gain of rental housing, which has been accomplished by both preserving the stock of existing rental housing and by adding new rentals. It has prevented the loss of purpose-built rental housing, with a net gain of approximately 2,600 units in areas protected by the ODP over the last 8 years (City of Vancouver, 2021, 2022d).

3.2.2 Empty Homes Tax (EHT) and Underused Housing Tax (UHT)

Vancouver's Empty Homes Tax is a policy that taxes property owners if their property is vacant for six months or more in a year. According to the City of Vancouver (2023), homeowners are required to submit a declaration each year to determine if their property is subject to EHT. Properties deemed empty in the 2022 reference year were taxed at a rate of 3% of the property's 2022 assessed value. In 2023, the rate increased to 5%. This policy was introduced in 2017 to return homes to the rental pool (Ruttle, 2023, City of Vancouver, 2022b). Due to the enforcement of the policy, about 49% of the properties declared vacant in 2020 were occupied in 2021. Moreover, vacant properties were reduced by 20% between 2020-2021. According to the City of Vancouver (2022b), about $115.3 million generated from the tax (2017-20121) was allocated to the funding of affordable housing initiatives. A review of the EHT program is underway, and it will be looked at by the city council in the spring (Ruttle, 2023). A similar policy, Underused Housing Tax (UHT), has been introduced by the federal government. The UHT is an annual 1% tax on the ownership of vacant or underused housing in Canada that took effect on January 1, 2022. The tax is generally aimed at non-residents, non-Canadian owners and to ensure that units are not left empty or underused but occupied by tenants (Deveau, 2023).

3.2.3 Acquiring Privately-Owned Properties: Single Room Occupancy (SROs) Initiative

Vancouver's SRO is a Public-Private Partnership (P3) model initiated by BC government in 2007 to tackle homelessness in the city. Since 2007, the provincial government purchased 24 Single Room Occupancy (SRO) hotels in Downtown Eastside and surrounding areas via its Single Room Occupancy Initiative to preserve affordable rental housing for low-income people who are at risk of homelessness (BC Housing, 2018). In addition, BC Housing purchased a hotel in Chilliwack, and Surrey to create 80 and 26 new supportive housing units in 2021, respectively (Daniels and August, 2023). Although acquisition programs are a cost-effective way of meeting urgent housing needs while preventing displacement and homelessness (Daniels and August, 2023), many of the buildings in Vancouver's Downtown Eastside were aging and in need of repair (maintenance) at the time of purchase, and housing officials and advocates have been calling for better oversight and management.

In 2011, BC Housing announced SRO Renewal Initiative (SRORI) to begin renovation and restoration of 13 provincially-owned SRO hotel buildings, starting in 2012. On top, the City of Vancouver launched an ambitious SRO Purchase Plan in 2020 to purchase and renovate all remaining private 105 SRO properties (2,500 rooms) (City of Vancouver, 2020b). This plan is a continuation of a previous SRO revitalization effort (estimated at $1 billion), contingent on federal and provincial funding (City of Vancouver, 2017b; Daniels, and August, 2023). Notwithstanding these renewal initiatives, residential hotel units in Vancouver's Downtown Eastside are unfit to live in and B.C.'s premier, David Eby, is calling for the residential hotel units to be replaced or phased out (Lloyd, and Nassar, 2023). The SROs situation in Downtown Eastside generally shows a lack of comprehensive acquisition strategy in Canada's housing system, which is unique on the international stage. The United States, France, Korea, and Sweden, among others, have built large-scale acquisition programs into their housing policies—and have protected affordability for hundreds of thousands of units over the past few decades (Daniels, and August, 2023).

3.3 Reducing the Cost of New Development (PBR)

3.3.1 Waiver on Development Cost Charges (DCCs) and Development Cost Levies (DCLs)

Cities and municipalities in the Vancouver Metropolitan area collect DCCs and/or DCLs from new residential and non-residential developments to fund the infrastructure needed to provide services to the future occupants of these buildings (City of Vancouver, 2022c; Metro Vancouver, 2022a). These include Water Development Cost Charges (water and sewer services) and other infrastructure-related expenses such as Parks, Childcare facilities, Social and non-profit housing, and Engineering infrastructure, among others (City of Vancouver, 2022c). The concept of funding water infrastructure through DCCs has been encouraged by most Greater Vancouver Water District (GVWD) members and is a critical component of the region's long-term financial plan. These charges (DCCs/DCLs) however contribute to increased cost of new development, including purpose-built rental (PBR). Consequently, there have been calls from the development community for a complete waiver of DCCs/DCLs on affordable housing projects (CHMC, 2022).

On June 22, 2022, Council of the City of Vancouver approved a DCL update that included a phased increase to DCL rates, as well as amendments to the "for-profit affordable rental housing" waiver that came into effect on September 30, 2022 (City of Vancouver, 2022e, Metro Vancouver, 2022b). With this amendment, DCLs can be waived or reduced across the City-wide Vancouver DCL and Layered (Area-Specific) DCL districts on construction of 100% secured rental housing, subject to meeting the requirements of "for-profit affordable rental housing"—20% of the units are secured at below-market rents (Class A- Below-Market Rental Projects) or all units are secured at average market rents for newer rental buildings (Class B

- Market Rental Projects). That is, for rental projects qualifying as Class A, a 100% waiver is provided while an 86.24% waiver is provided for projects qualifying as Class B (Metro Vancouver, 2022b).

3.3.2 Exemption from Community Amenity Contributions (CACs)

Vancouver's Community Amenity Contributions are in-kind, or cash contributions from developers when the City Council grants development rights through rezoning (City of Vancouver, 2023c). To be more specific, the policy requires developers to contribute towards the provision of community amenities such as parks, community centers, and affordable housing in exchange for additional density or other benefits (B.C Ministry of Community, Sport, and Cultural Development, 2014). Developers can either provide the amenities themselves or pay cash in lieu of the amenity and the cash contributions can be used to fund (build and expand) facilities like affordable housing projects (PBR) (City of Vancouver, 2023c; B.C Ministry of Community, Sport, and Cultural Development, 2014). Over the past few years, the community amenity charge process has been thrust into several development sites which were purchased for proposed rental projects. These much-needed rental units could end up on the sideline, as unexpected costs could render these rental developments infeasible (Goodman, and Jagger, 2021). Consequently, the City of Vancouver has stated that 100% rental projects would be exempted from CACs in specific areas (City of Vancouver, 2017).

3.4 Rental Housing (PBR) Financing Models

3.4.1 Vancity Financing Model

For developers and operators of affordable housing, a lack of early investment restricts the speed and scale of housing development (Canada Mortgage and Housing Corporation (CMHC), 2023a). Furthermore, most financing from the National Housing Strategy, BC Housing, and conventional lenders is only available at the start of construction or later. To address this, the Vancity Community Foundation has created a model (Vancity Affordable Housing Accelerator Fund) to provide low-cost loans for affordable rental housing during the pre-development phase. The Fund offers three types of loans to the community housing sector to aid the construction of new rental housing development in British Columbia. The first is pre-development loans which help developers with rezoning and development permit processes, and are repaid when construction financing is secured, usually within 2-3 years. A pre-construction equity loan is also available to support the building permit process and development of working drawings (repaid in 5-7 years after first occupancy). Finally, acquisition loans are offered to support the acquisition of land or adjacent sites that increase units or a project's financial viability (and the repayment takes place once a mortgage or first refinancing is secured) (CMHC, 2023a).

3.4.2 CMHC Housing Accelerator Fund

In the summer of 2023, the Canada Mortgage and Housing Corporation (CMHC) will be launching the Housing Accelerator Fund, which provides incentive funding to local governments to boost housing supply initiatives across Canada. In addition, the Accelerator Fund supports the "development of complete, low-carbon and climate-resilient communities that are affordable, inclusive, equitable, and diverse". The Fund is, however, limited to cities and/or local governments in Canada with delegated authority over land use planning and development approvals, including First Nations, Métis, and Inuit governments. Regional districts, provinces, or territories can also access the Fund if there isn't a municipal-level authority (CMHC, 2023b).

3.5 Assisting and Securing Tenure for Renters

3.5.1 BC Housing Rental Assistance Program (RAP)

The Rental Assistance Program provides eligible low-income working families with monthly assistance to help with their monthly rent payments. To qualify, families must have a total before-tax household income of $40,000 or less, were working at some point in the last year, and have at least one dependent child. Due to these qualification requirements, existing clients need to reapply each year (BC Housing, 2022).

3.5.2 Tenant Relocation and Protection Policy (TRPP)

Vancouver's Tenant Relocation and Protection Policy was enacted in 2015 and amended in June 2019, with the intention to provide tenants with increased support to mitigate the impacts of relocation. That is, the policy provides tenants with enhanced compensation if they are displaced by renovation/redevelopment and is prioritized based on a need for vulnerable tenants (City of Vancouver, 2019b; Vancouver Tenants Union, 2019). In addition to the initial primary rental housing stock coverage, there has been an amendment to enable the inclusion of secondary rental housing and non-profit social and co-op housing. The aim of TRPP is to protect tenants from being displaced from their homes and ensure that they have access to suitable replacements (City of Vancouver, 2019b). Applicants seeking a rezoning or development permit for redevelopment or major renovations resulting in permanent relocation of tenants in existing residential rental units must provide a Tenant Relocation Plan.

At a minimum, the Tenant Relocation Plan must include the following: early communication with tenants (a letter sent by the applicant to all tenants outlining the proposed project and expected timeline), compensation (financial) provided based on the length of tenancy, an arrangement for an insured moving company or a flat rate payout for moving expenses, assistance in finding accommodation and relocation, and Right of First Refusal for existing tenants to move back into the new building with a 20% discount off starting market rents, or at the new non-market rents in circumstances when the replacement unit is social housing (City of Vancouver, 2019b). While TRPP provides protection for tenants, it may discourage landlords (providers) from carrying out such renovations, resulting in the housing conditions deteriorating in quality.

4. Purpose-Built Rental (PBR) Housing in Metro-Vancouver: Policy Gaps and the Solutions

Vancouver's high cost of living, coupled with a housing shortage, has made it challenging for many low- and middle-income residents to find suitable accommodation (Urban Development Institute (UDI), 2023; Culbert and Fumano, 2022). A solution to this problem is increasing the stock of rental (PBR) housing (City of Vancouver, 2020). Unfortunately, the delivery of PBR housing in Metro Vancouver has been hindered by several barriers, including the high cost of land and limited availability (difficulty in accessing land), restrictive zoning and government regulations, development charges and levies, and community resistance (nimbyism), among others. This section reviews the policy gaps and/or barriers to purpose-built rental (PBR) housing delivery in Metro Vancouver and the policy solutions (recommendations).

4.1 Make Land Available for Purpose-Built Rental (PBR) Housing

According to the Canada Mortgage and Housing Corporation (CMHC) (2021) and Altus Group Economic Consulting (2021), the cost of land in Vancouver is one of the highest in the world. It is estimated that land costs typically make up around 20-30% of the total cost of developing a new rental apartment building in the city. This is considered too high, making it difficult for developers to procure lands for affordable rental housing (Altus Group Economic Consulting, 2021; CMHC, 2021; Coriolis Consulting Corp, 2019). Also, zoning regulations are a significant barrier to the delivery of PBR housing in Vancouver. According to CHMC (2022), too much land inside the city is tied up by outdated rules— exclusionary zoning that limits the types of housing that can be developed in certain areas, including the availability of land for PBR development. To address these obstacles, the Canada Mortgage and Housing Corporation (CMHC) recommends that municipalities (cities):

i. Provide tax breaks and grants, as incentives and to make it viable, for developers to procure lands for affordable rental housing development.
ii. Stop exclusionary zoning. This will make land available for rental housing development in prime areas. In other words, CMHC proposes that cities amend the zoning bylaws or introduce flexible zoning policies that allow for higher-density developments and to enable developers build rental housing in areas where it is needed most (CHMC, 2022). This aligns with a recommendation from the Ontario Housing Affordability Task Force, urging municipalities to "stop using exclusionary zoning that restricts more housing construction" (Ontario Housing Affordability Task Force, 2022, p. 10).

4.2 Make Rental Housing (PBR) Development an Attractive Investment

3.2.1 Reducing the Capital Requirement for PBR Projects
In addition to exclusionary zoning, cities have strict zoning bylaws and policies that require a certain percentage of units in a project to be reserved for affordable or non-market housing (inclusionary zoning). While this is a noble idea, it often lowers profit margins and thus discourages

developers from pursuing PBR projects. Many developers opt for condominiums since they require less upfront capital and provide higher profits. The Urban Development Institute (UDI) and others recommend that cities implement policies to reduce the capital requirement for PBR projects. These include:

i. Eliminating Development Cost Charges (DCC) such as the Community Amenity Charges (CAC) on PBR housing projects to accommodate for losses resulting from the requirements to reserve a certain number of affordable units in new projects (Government of BC, 2021; UDI, 2022). In addition, the development community (UDI) recommends that Development Cost Levies (DCL) such as the federal Goods and Services Tax (GST) on rental housing projects should be eliminated. In fact, a report by the Canada Mortgage and Housing Corporation (2022) found that government charges (fees, taxes, and levies) can add up to more than 20% of the cost of building new housing. DCCs tend to incentivize the construction of higher-priced units for sale, rather than the construction or renovation of rental housing (BCGEU, 2018). In lieu of the requirement to reserve certain units in new projects for affordable housing, waving development costs or providing tax incentives for PBR developments would significantly reduce some of the time and cost barriers, and make it more affordable and an attractive option for developers (CHMC, 2022; UDI, 2023).

ii. Reviewing or raising the rebate thresholds: Reviewing or raising the rebate thresholds to "more accurately reflect current values in local markets" would allow the rebates to effectively support new PBR development, rather than creating another barrier. UDI argues that "by limiting the availability of GST rebates to unit values at $450,000 or less, many homes are excluded in urban areas of Metro Vancouver" (UDI, 2023, p.10).

iii. Implementing a cap on Development Charges (Fix CAC Rates): The development community also recommends that BC implement a cap on the amount development charges could cumulatively increase in a calendar year to reduce the impact on new housing when provincial, regional, and municipal charges are increased separately. UDI argues that introducing a cap would ensure that large DCC or DCL changes are phased in, reducing the risks associated with large increases after a project has been through the budgeting process. Moreover, a fixed CAC rate contributes to a more certain development process as it allows developers to have security after they have purchased land and finalized financial agreements (UDI, 2023). Generally, it is the view of the development community that increasing certainty around the number, timing, and magnitude of government fees could improve affordability by decreasing other development costs, such as those for construction (labour, equipment) and financing (CHMC, 2022).

iv. Exploring alternate tools to raise revenue to fund municipal services and capital projects: Where infrastructure is largely funded through means other than development charges, government fees on residential development tend to be comparatively lower. This may contribute to new housing being delivered at a lower cost (CHMC, 2022).

4.2.2 Restoring Rollover Provisions and GST Exemptions

Canadian tax policy since 1972 has made new rental development unattractive and a very poor investment. According to Enemark (2017), Canada had a favorable tax treatment for building new rental housing from 1946 to 1972. For instance, rental housing investors could claim very high depreciation – 10% per year on wood frame buildings – against the taxable income from the properties. This provided a "paper loss" tax shelter and encouraged private investors to fund rental housing construction. Unfortunately, the allowable depreciation was cut to 5% in 1972, then later to 4%. Also, rental housing investors could claim any losses to reduce taxable income from other sources. Such subsidies are often needed in the first years of a project facing high startup costs and lower tenant revenues. This, coupled with the accelerated depreciation rate, provided a very attractive tax shelter for rental housing investors until 1972 when it was eliminated.

Another tax policy was rollover provisions, which exempted an owner (investor) who sold a rental building from paying taxes on the profits if they were re-invested in rental housing within the calendar year. This encouraged re-investment in new rental housing. Also, because people wanting to sell a building would do repairs and maintenance to increase the value and maximize profit, buildings were well maintained or in a good state of repair. Rollover was no longer allowed in 1972, and a capital gains tax was imposed— first at 50%, then at 75% (it is now back to 50%) (Clayton Research, 1998; Enemark, 2017). Given that most long-term capital appreciation in the rental market is around the inflation rate and the taxes paid are substantial, the sales of rental buildings and re-investment ceased, and liquidity disappeared from the market. In effect, the removal of tax incentives for rental housing has made the situation worse and led to where we are today.

According to Tex Enemark, an executive assistant to the minister responsible for CMHC in 1972 and later a deputy minister in the B.C. government, if investors in rental housing are given better tax treatment, hundreds of millions of dollars currently sitting idle in savings would drive a rental housing boom. Enemark and other housing policy consultants thus recommend that:

i. Governments and cities treat small rental businesses the same as family farms (before 1972, when small rentals were treated as any other small business and paid lower taxes) and allow qualifying rental owners to claim the small business tax rate and active business tax treatment (GST exemptions).
ii. Rollover provisions be restored. If necessary, "restore the Capital Cost Allowance to 1972 levels and allow investors and owners to write off losses against non-rental income" (Enemark, 2017). These tax changes, according to consultants, will attract investors and increase the supply of rental housing in Canadian cities.

4.2.3 Streamline Development Approval Processes: Cutting Red Tape to Build Faster

The development approval process in Metro Vancouver is lengthy and unpredictable. This results in delays and increased costs for new rental housing development. In addition to lengthy development processes (approval for development and building permits), uncertainty in the total amount of charges on a building project adds a level of risk, which deters developers from pursuing housing PBR projects (UDI, 2023). One policy solution from the development community is to "expedite and improve processes" for developing rental housing (City of Vancouver, 2020) by streamlining the development process and approvals (UDI, 2023). This will reduce uncertainty and delay for PBR housing projects and address the risks associated with taxes that are charged annually, such as the Additional School Tax (AST). Thus, having identified long and uncertain project approvals timelines as a policy gap and/or barrier to housing delivery in Metro Vancouver, UDI (2023) and CHMC (2022) propose that municipalities cut red tape to build faster and reduce costs. These include:

i. Establishing "standardized and predictable development approval timelines and processes" (UDI, 2023, p.09). This recommendation aligns with the Expert Panel, which advised the B.C. government to "impose statutory time limits to all stages of the property development process, municipal or other, for all types of development" (Government of British Columbia, 2021, p. 26). Similar limits or capping of development approval timelines have been imposed in Ontario and Alberta via legislation (Bill 108 in Ontario and Bill 48 in Alberta) in 2019 and 2020, respectively. Both pieces of legislation stipulate maximum time limits on the various types and stages of development applications. In Alberta, this includes a 20-day limit to determine application completeness, a 60-day limit for subdivision applications, and a 40-day limit for development permit applications (Government of British Columbia, 2021).
ii. Incorporating pre-zoning into Official Community Plans (OCPs). It is estimated that rezoning could take 12-26 months in Vancouver. The taxes incurred during this time, and the uncertainty embedded within the public-hearing process, add risk to new housing development, including PBR supply. Pre-zoning sites to permit the density and typologies consistent with the plan, according to CHMC (2022) and UDI (2023), would reduce approval timeline by decreasing the time and risks associated with a full rezoning process. Approaches include "pre-zoning at the end of area planning processes or pre-zoning within 800 meters of major transit hubs" (UDI, 2023,

p.09). This would improve certainty for developers and speed up the approvals process, reducing both cost and time barriers to new rental housing delivery.

4.3 Community Resistance to Higher Density and PBR Development (NIMBYISM)

While the majority of residents call for more housing options and density, there are some (specifically homeowners) who oppose higher-density developments and resist the construction of PBR housing in their neighborhoods, due to concerns about traffic congestion, parking shortages, and changes to neighborhood character (Lakusta, 2017; Lupick, 2016). This often led to delays in the approval process for higher-density PBR housing projects, or even their cancellation. A policy solution to this, according to CMHC (2022) and UDI (2023), is for cities/municipalities to incorporate pre-zoning sites into Official Community Plans (OCPs).

4.4 Financing for Affordable Rental Housing

4.4.1 Land Value Capture (LVC)

Land Value Capture is a policy that allows governments and cities to recover and reinvest land value increases that result from public investment and other government actions (Given and Reisman, 2019; BCGEU, 2018). For example, if a new transit line is built, the increase in land values around the transit stops could be captured by the City and used to fund affordable housing development and other infrastructural projects. LVC has the potential to be a more transparent method of capturing land value than Vancouver's existing CAC system, and more accurate than Development Contribution Expectations (DCEs). The BC General Employees Union (2018) thus recommends that Council should explore how LVC mechanisms can be created, adopted, and applied to collect part of the wealth being created by public decision-makers in the City of Vancouver. While LVC has not yet been implemented in Vancouver, Councillor Boyle submitted a motion to Council in late 2018, calling for LVC policy. Currently, the City of Vancouver and TransLink are exploring an LVC tool that could work within or replace the Community Amenity Contributions (CACs) and Development Cost Charges (DCCs) (The Keesmaat Group, 2021; Given and Reisman, 2019; City of Vancouver, 2019d). LVC has been implemented in countries including Germany and the Netherlands, and it has proved to be successful as Germany was able to capture more than 90% of land value whereas the Netherlands captured almost 90% (Given and Reisman, 2019).

4.4.2 Low-Income Housing Tax Credits (LIHTC)

LIHTC program provides tax credits to developers who build affordable rental housing in the United States. It subsidizes the acquisition, construction, and rehabilitation of affordable housing for low- and moderate-income tenants (Tax Policy Center, 2020). Owners (developers) of projects receiving the LIHTC must meet an income test for tenants and a gross rent test, with the following criteria: at least 20 percent of the project's units should be occupied by tenants with an income of 50 percent or less of area median income adjusted for family size (AMI), at least 40 percent of the units should be occupied by tenants with an income of 60 percent or less of AMI, or at least 40 percent of the units should be occupied by tenants with income averaging no more than 60 percent of AMI, and no units are occupied by tenants with income greater than 80 percent of AMI. The gross rent test requires that rents do not exceed 30 percent of either 50 or 60 percent of AMI, depending upon the share of tax credit rental units in the project (Tax Policy Center, 2020; Keightley, 2019). Since the mid-1990s, LIHTC has supported the construction or rehabilitation of about 110,000 affordable rental units each year (though there was a substantial drop-off after the Great Recession of 2008–09). Today, it is the most important resource for creating affordable housing, including PBR in the US (Tax Policy Center, 2020).

Canada lacks such financing programs. In a study titled "*Building Affordable Rental Housing in Unaffordable Cities: A Canadian Low-Income Housing Tax Credit*", the authors propose a made-in-Canada Low-Income Housing Tax Credit (LIHTC) that can build on the lessons learnt by the equivalent U.S. program (Steele, and Des Rosiers, 2009). They argue that LIHTC encourages better location and maintenance of low-income housing by enabling competition between developers for tax credits and creating a market test for the viability and need for low-income housing. This tax credit, according to the Canadian Observatory on Homelessness (2015), would complement other programs that aid renters, such as housing allowances, rent supplements, and local government programs. The LIHTC is also a better way for Canadian Mortgage and Housing Corporation to disburse funds to lower levels of government for social housing construction purposes. Besides, such a program is an ideal way to leverage some of the short-term stimulus funding for the construction of social housing into a sustainable long-term investment (Canadian Observatory on Homelessness, 2015; Steele and Des Rosiers, 2009).

5. Additional Rental Housing Policy Gaps and Proposed Solutions

5.1 Improving Rental Affordability

5.1.1 Temporary rent freeze

Rents are already at a crisis level, and even vacancy control, when implemented, would not change this reality. Hence, the Vancouver Tenants Union (2018) and the BC General Employees' Union (2018) propose that cities freeze the annual rent increase at 0% rate for four years, similar to what has been done in New York from 2014 – 2016 (the city continues to offer a need-based rent freeze program). In addition, subsequent annual rent increases should be fixed to real cost increases only (i.e., limit maximum rent increases to inflation only), and the notice period for rent increases to six months.

5.1.2 Need-based Refundable Tax Credit

The Vancouver Tenants Union (2018) proposes that rather than a flat $400 rebate, offer low- to middle-income renters a scaled, refundable tax credit for their rental costs based on the percentage of income spent on rent. The credit would be aimed at reducing rental expenditures to 30% of income. According to the Union, for such a policy (need-based refundable tax credit) to be truly effective, it should be paired with vacancy control.

5.1.3 Rent Bank System for Low-Income Renters

Affordability was a common issue raised throughout B.C Rental Housing Task Force's engagement process. Consequently, the task force proposes a B.C.-wide Rent Bank system for low-income people. This Banking system would build on the existing municipal rent banks such as the Vancouver Rent Bank, as well as recent improvements to provincial housing supports under the Rental Assistance Program (RAP) and Shelter Aid for Elderly Renters (SAFER) (B.C Rental Housing Task Force, 2018; City of Vancouver, 2018).

5.2 Improving Tenure Security and Procedural Safeguards

5.2.1 Stop Renovictions

It is the general view of the BC Rental Housing Task Force (2018) and the Vancouver Tenants Union (2018) that renovations should be approached as an issue of mutual negotiation, and accommodation between tenants and landlords should not form a basis for eviction where the tenant has demonstrated willingness to relocate in order to accommodate the work and its duration. Furthermore, eviction as a result of a municipal or government order currently constitutes a 'for cause' form of eviction. This, according to the Vancouver Tenants Union (2018) and the BC General Employees' Union 2018), is completely unfair, leaving tenants ordered out of their homes through no fault of their own with little notice and no compensation. The Task Force and the two unions thus propose that there should be mandatory compensation for eviction or relocation [to ensure security during transitional periods].

5.2.2 Re-implement Vacancy Control

The Vancouver Tenants Union [VTU] (2018) and the BC Rental Housing Task Force (2018) advise cities to re-implement vacancy control by limiting rent increases to once every twelve months, regardless of whether there has been a change of tenant. Because the current model of rent control incentivizes landlords to find excuses to evict long-term tenants in order to seek higher rents in high rental markets. According to the Vancouver Tenant Union, rental rates should remain the same for a subsequent/new tenant, unless the landlord can demonstrate increased operating costs or expenses that require a rent increase to recoup these costs within a reasonable period of years. Tying rent control to units would remove the financial incentive to evict tenants paying less than the market rate and likely decrease the number of renovictions and other types of bad-faith evictions (BC General Employees' Union, 2018).

5.2.3 Empowering the Residential Tenancy Branch (RTB)

Tenancy branches in many other jurisdictions are better empowered to enforce their relevant tenancy laws and policies. Manitoba's RTB, for example, can intervene to insure the return of security deposits and even redirect rent payments to the Branch so it can hire contractors to carry out required work on rental units when landlords fail to comply with service and repair orders. In this regard, the BC Rental Housing Task Force (2018) and others recommend that the B.C. government pass legislation that allows more effective and proactive enforcement in this province. Besides, making the Residential Tenancy Branch more responsive, accessible, and proactive will strengthen enforcement of the existing laws (BCGEU, 2018, City of Vancouver, 2018).

5.2.4 Eliminate Security Deposits

Security deposits often present a significant problem for tenant mobility. Disputes over a security deposit in an existing rental as well as where a tenant is left unable to come up with a security deposit and the first month's rent on a new unit can result in loss of opportunities for housing (B.C Rental Housing Task Force, 2018).

5.2.5 Increase Grace Period for Late Payment of Rent

Non-payment of rent remains the most frequently disputed issue with the RTB (BC Rental Housing Task Force, 2018). The Vancouver Tenants Union (2018) and BC Rental Housing Task Force (2018) thus propose that the grace period for late payment of rent be increased from 5 days to 14 days. Increasing the notice period will create clearer and more compelling grounds for landlords to legitimately end tenancies where necessary. This is already the law in Ontario (VTU, 2018).

5.2.5 Simplified Process for Subletting

The reality of the current job market requires tenants to be geographically flexible (BC Rental Housing Task Force, 2018, Vancouver Tenants Union, 2018). Hence, the Tenants Union recommends that the Residential Tenancy Act (RTA) be updated so that permission to sublet is not unreasonably withheld.

5.3 Preventing Discrimination (Ensuring Fairness)

5.3.1 Prohibit Discrimination against Tenants with Pets

Housing for tenants with pets, according to Vancouver Tenants Union (2018), is very difficult to come by in Vancouver's tight rental market. Therefore, tenants should not be presented with the possibility of having to give up a pet if they are forced to move.

5.3.2 Prohibit Discrimination against Tenants with Children

The B.C Rental Housing Task Force (2018) and the Vancouver Tenants Union (2018) argue that tenants should not face eviction for having an unreasonable number of occupants, where the additional occupant(s) in the unit are children. This is already the law in Ontario in recognition that families who rent already have extraordinary difficulty finding housing.

5.3.3 Regular Audits of Tenant Application Processes

The Office of the Information and Privacy Commissioner for B.C. recently found that landlords routinely request too much information from tenants, and there is no accountability for how this information is used. The current lack of accountability leaves tenants unable to prove that they have been discriminated against. There is little recourse or evidentiary basis for tenants to pursue Human Rights claims where they believe they have been discriminated against, as well as difficulty in accounting for real financial losses resulting from the discrimination. The only solution, according to the Vancouver Tenants Union (2018), is proactive investigation and auditing of rental listings that require landlords to give written reasons for declining an application, with substantial fines imposed where discrimination is found to occur.

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