

# A Regional Model for Inclusionary Housing

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## Metro Vancouver Regional District

*Final Report • February 29, 2024*

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# 1 Introduction, Background and Context

# Introduction

The purpose of this study is to take stock of current inclusionary housing policies and practices within the Metro Vancouver region and develop an inclusionary housing model framework that would support Metro Vancouver and the communities within it to reach its objectives for improved affordable housing options moving forward. The goals of the inclusionary housing model framework are to 1) provide a consistent framework of policies that municipalities that either already have or do not have inclusionary housing policies can voluntarily adopt or “opt-in” to, and 2) to support municipalities to implement the tool in the most effective way.

The inclusionary housing model framework presented in this report has been developed based on a review of current inclusionary housing policies and practices in the region and consultation with key stakeholders on the opportunities and challenges faced with the existing practices; an in-depth review of best practices and case studies from other jurisdictions; and a fulsome economic feasibility analysis that explores how to balance the available land lift with the amount of affordable unit set aside and depth of affordability desired, and that is feasible within current market conditions.

The scope of recommendations in this report include a recommended policy framework and phase-in approach, as well as considerations for the unit set aside rates, depth of affordability and affordability period, the size and tenure of projects included within the scope of this policy, provisions for project incentives and opt-out considerations, and potential roles for the Metro Vancouver Housing Corporation in the administration of units. The role of Metro Vancouver in the ongoing monitoring and evaluation of the inclusionary housing framework is also considered through recommended reporting processes. The final recommendations also include a framework for conforming to recent legislative changes in British Columbia and consider how the framework could be implemented should the Province of British Columbia enact legislation to enable inclusionary zoning.

# Overview of Study

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This section provides an overview of the study background, objectives and approach.

# Background

Metro Vancouver is comprised of a federation of 21 municipalities, one electoral area and one treaty First Nation with a population of 2.6 million people. Like in many other cities in Canada, housing affordability is one of Metro Vancouver's most challenging regional issues. Metro Vancouver is taking action and looking for new solutions to the housing affordability crisis. This study explores how inclusionary housing policies can be used as effective tools for creating more affordable housing within the context of Metro Vancouver.

Planning for diverse and affordable housing choices is one of the goals of **Metro 2050**, the regional growth strategy adopted in February 2023. In addition, the **Metro Vancouver Housing 10-Year Plan (2022 Progress Update)** identifies the affordable housing crisis the region is facing and recognizes the need to increase the region's affordable housing portfolio.

**Goal 4: Provide Diverse and Affordable Housing Choices** of the regional growth strategy includes a strategy to encourage policies and actions that expand rental housing supply, mitigate or limit the net loss of existing purpose-built rental and non-market housing stock, and protect renter households. Policy 4.2.3 sets a regional target that by 2050 at least 15% of newly completed housing units be affordable rental housing units. Furthermore, Policy 4.2.7 a) requires that member jurisdictions include a statement on how they will support and achieve the goal of having 15% of new housing units be affordable rental housing.



# Study objectives

## OBJECTIVE 1

### **Develop a model inclusionary housing policy framework**

The first objective of the study is to develop a model inclusionary housing policy framework that member municipalities can voluntarily adopt or “opt-in” to. The model policy has been developed using information gathered about the challenges and opportunities that municipalities, developers, and non-profits currently face under existing inclusionary housing policies in the region. It is also informed by economic theory, best practices and case studies from other jurisdictions, and a fulsome economic feasibility analysis that explores how to balance the available land lift with the amount of affordable unit set aside and depth of affordability desired, and that is feasible within current market conditions. This extensive and robust study of inclusionary housing aims to support municipalities to implement the tool in the most effective way and provide a consistent framework of policies that municipalities within the region that either already have or do not have inclusionary housing policies can voluntarily adopt or “opt-in” to.

## OBJECTIVE 2

### **Advocate to the Province of British Columbia for inclusionary zoning**

The second objective is to develop material to be presented to the Province of British Columbia for a potential framework for mandatory inclusionary zoning for consideration as a legislative tool to create new affordable housing. Unlike other jurisdictions in Canada and abroad, the current regulatory context in British Columbia (BC) does not enable inclusionary zoning which would allow municipalities to set a required percentage of affordable housing to be provided directly as part of zoning requirements. Instead, BC municipalities use voluntary inclusionary housing policies, density bonusing, and incentives which encourage the delivery of affordable housing through private development by securing a certain amount of affordable housing as a condition of rezoning or in exchange for additional density. However, the Province has recently indicated its willingness to explore inclusionary zoning and it is anticipated that legislation to enable inclusionary zoning in BC will be introduced by the Province in Spring 2024.



# Study approach

## APPROACH & METHODOLOGY

This project involves cataloging and assessing existing inclusionary housing policies and informal practices in the region, conducting a scan of global best practices, assessing the economic feasibility of various inclusionary housing models in different market typologies, and developing policy alternatives and recommendations that could be applied in the Metro Vancouver region. The project is being undertaken in five parts.

**Part 1: Detailed jurisdictional scan** of inclusionary housing policies and practices currently in place in the Metro Vancouver Region. This work included interviews with various municipalities that have inclusionary housing policies or practices to catalogue the details of those policies/practices

**Part 2: Review of inclusionary housing best practices** in other jurisdictions in Canada and the United States, as well as **key informant interviews** with non-municipal stakeholders for feedback on their experience with inclusionary housing policies; what is working well and what might need further consideration.

**Part 3: Economic analysis** that explores the impact of an inclusionary housing requirement on development viability and includes looking at market typology variables such as land value, development costs, potential land value lifts, and market housing prices to illustrate strong, moderate and emerging markets. The results test how different policy variables (i.e. rent levels, incentives or densities) affect development viability and the ability to generate new affordable housing units.

**Part 4: Policy alternatives** for the model inclusionary housing framework developed based on the research and analysis undertaken in the previous three parts, and Metro Vancouver's goals for inclusionary housing across the Region.

**Part 5: A recommended regional Inclusionary Housing model framework** which outlines the recommendations for an elective or 'opt in' inclusionary housing model that could be applied across multiple municipalities or at the regional level. The final recommendations will also consider how the framework could be applied in an inclusionary zoning context, if enabled by the Province of British Columbia.

# Background

## *Inclusionary housing and Inclusionary zoning*

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This section provides a background summary on inclusionary housing and inclusionary zoning: what it is, why it is important, and its key features.

# What is inclusionary housing & inclusionary zoning?

**Inclusionary housing (IH)** is a broad term that refers to municipal initiatives that use planning regulations and the development approval process to engage private developers to provide a percentage of affordable housing in their otherwise market-rate housing developments.

**Inclusionary zoning (IZ)** refers to a form of inclusionary housing. Inclusionary zoning refers to a zoning regulation or land use ordinance that requires developers of projects, often of a certain size, to provide a set amount of affordable housing in their market-rate residential development as a condition of development approval. Inclusionary housing therefore is a more general and inclusive term while inclusionary zoning is a particular type of inclusionary housing.

	Definition	Example
<b>Mandatory Inclusionary Housing (Inclusionary Zoning)</b>	<p>Mandatory inclusionary housing practices, such as inclusionary zoning, require all developments to provide affordable housing as a condition of zoning and receiving development approval on as-of-right development. These types of programs essentially require developers to provide the affordable housing proportion outlined in the regulation, if they want to pursue any development project.</p> <p><i>There is evidence from jurisdictions using these types of policies that they are very effective at creating affordable housing, where supported by market conditions.</i></p>	<p>These approaches are permitted in Ontario, Manitoba, Alberta, and have been used across the US and England.</p>
<b>Inclusionary Housing</b>	<p>Voluntary inclusionary housing policies encourage the delivery of affordable housing through private development by requiring a certain proportion of affordable units in exchange for additional density or some other incentive. The two primary voluntary approaches are “rezoning-based practices” and “incentive-based practices”.</p> <p>Rezoning-based inclusionary practices, such as those proposed in this study, leverage the increased density allowed under a rezoning approval in exchange for the provision of affordable housing. Developers have the option to build without providing affordable housing under the existing as-of-right conditions or build at a higher density with the affordable provision. In these programs, the cost to the developer of providing affordable housing units is recovered through additional revenues generated by the rezoning.</p> <p>In order for these policies to be effective, stakeholders believe that developers of affordable housing must be made “whole” by the incentives.</p>	<p>These approaches are used in Canada, including Metro Vancouver, and to a limited extent in Australia and the US.</p>

# Creating an inclusionary housing policy

There are many ways to implement affordable housing programs. Typically, municipalities tailor the design of their inclusionary housing policy to reflect their local housing market conditions and affordable housing needs. In designing an inclusionary housing policy framework, the trade-offs between the depth of affordability, number of units, and length of affordability must be considered., and the policy features will always need to support the affordable housing direction of the local Council.

*The design of an inclusionary housing policy differs based on the intended objectives of the policy:*

## Upzoning / Increased Density



- Creates affordable housing from the increased land value
- May include detailed, site-specific financial analysis

## Tenure of Affordable Housing

- There may be a need for both affordable ownership and rental in a community



## Incentives

- Policies tailored to balance incentives with the revenue losses from the affordable units
- Works better with mandatory policies or with not-for-profit developers



## Income Mixing



- Is there a policy direction to encourage income mixing in the community?

## Period of Affordability



- Permanent affordable housing has a larger financial impact, but provides long-term community benefit
- Limited affordability periods have lower financial impacts and will produce more affordable units

## Geographical Distribution of Affordable Housing

- Is there a policy direction to encourage distribution of affordable housing across the community?



# Inclusionary housing policy features

## Results of the jurisdictional scan

The details of inclusionary housing or zoning differ between communities that have implemented such policies, but all policy frameworks include decisions on these key features.

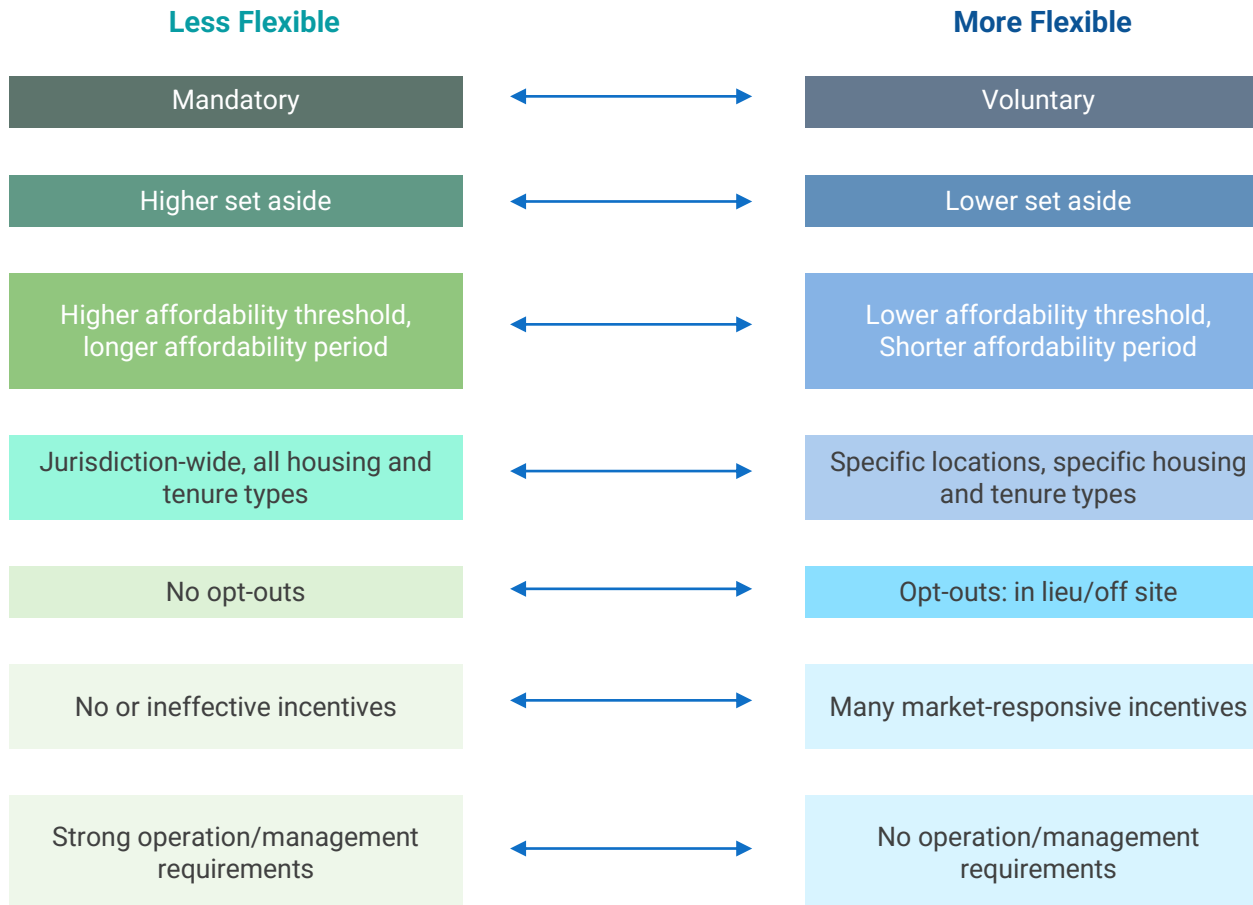
This report includes recommendations for each of these variables and a few others, based on the information gathered through best-practice research, stakeholder input, and the results of the financial analysis.

Key Feature	Description
<b>Affordable housing unit set-aside</b>	Set-aside requirements refer to the percentage of units a developer is required to set aside in the development as affordable housing. Most set-aside rates explored in the best practice review are between 5 and 30 percent, but some places have higher or lower requirements or sliding requirements.
<b>Depth of affordability</b>	The depth of affordability requirement determines how affordable the inclusionary units must be. In many existing policies, inclusionary housing units (i.e., affordable units) are rented at rents between 60 percent and 120 percent of average market rent.
<b>Length of affordability period</b>	Most programs control the duration of affordability of the inclusionary units to preserve affordability over the long term. Many policies also include compliance and monitoring requirements to ensure units remain affordable for the prescribed period.
<b>Restrictions based on location and type of housing development</b>	Inclusionary housing policies and regulations typically define where and when these policies apply (e.g., new residential development projects of a particular size, type, and tenure.) Some policies could apply only to new multi-family developments or could also include the rehabilitation of existing buildings, for example. Some policies also have specific requirements by neighbourhood.
<b>Opt-out options (e.g., off-site construction and in-lieu payments)</b>	Most inclusionary housing programs offer alternatives to providing the inclusionary housing requirements. These opt-out options typically involve allowing developers to make cash in-lieu payments or to construct the affordable housing off-site. This kind of flexibility is usually granted only in specific circumstances.
<b>Developer incentives</b>	Many inclusionary housing policies also involve some cost offsets in the form of incentives for developers. These incentives can work to either offset part or all the cost imposed on the developers of the inclusionary housing requirement. The most common developer incentives are density bonuses, fast tracked approval processes, reduced parking requirements, flexible design standards, waivers or reductions of permit and/or impact fees, and tax abatements.
<b>Administration and monitoring</b>	For an inclusionary housing program to be successful, there must be proper administration and oversight of the program. The specific requirements for ongoing administration of any inclusionary housing program will depend on the specific requirements and policy goals of the program.

# Inclusionary housing policy features

## Flexibility in program features

Depending on the goals and objectives of a municipality's inclusionary housing program, key policy features can be designed on a scale from less flexible to more flexible, as shown in the table below.



Source: Based on Urban Land Institute, 2016.

# Inclusionary housing policy features

## Best practices

Key takeaways from the jurisdictional scan of existing inclusionary housing and inclusionary zoning policies are highlighted below and were taken into consideration in the development of the recommended policy framework.

### U.S. CASE STUDIES KEY TAKEAWAYS

- 1 Inclusionary housing policies are most effective when the provision of affordable housing is **mandatory**. Voluntary programs have proven to be far less effective than mandatory programs.
- 2 Inclusionary housing policies are most effective when the requirements apply as **universally** as possible.
- 3 Inclusionary housing policies are most effective when they use **fixed** and **non-negotiable rules**. The rules should be fixed, non-negotiable and set out in advance. This applies most particularly to the **unit set-aside rate**, the **depth of affordability requirement**, and the **development incentives**. Furthermore, having fixed rules is important for treating all developers consistently and fairly. It is particularly important for them to know the cost of the affordable housing obligation ahead of time when purchasing the land for development.
- 4 Inclusionary housing policies are most effective when they **maintain affordability “permanently”**.
- 5 Inclusionary housing policies are most effective when they provide **limited flexibility**. The regulations can provide some flexibility by allowing the use of **cash-in-lieu** or **off-site development**. However, the flexibility should operate within strict parameters and only allows these alternatives only when they demonstrably produce a greater public benefit than the on-site obligation.

### UK CASE STUDIES KEY TAKEAWAYS

- 1 England’s version of inclusionary housing policies has become more effective over the years in large part due to the **growing capabilities of the local authorities**. Their targets have been more demanding as they became more familiar with the process and certain of their powers.
- 2 England’s version of inclusionary housing policies is most effective when they **consider local market conditions**. Local market conditions have a strong influence in how the targets are set and met. In general, authorities in high-demand areas for market housing have been able to impose and achieve far higher targets than authorities elsewhere.
- 3 Although England’s experience holds many relevant lessons for Canada, because of fundamental differences between the English and Canadian planning systems, **the approach used in England cannot be readily replicated in Canada**.

# Background

## *Inclusionary housing in Metro Vancouver*

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This section provides an overview of the current context in Metro Vancouver by exploring the existing inclusionary housing policies in the region and the state of delivery of affordable housing in the region.



# Types of inclusionary housing policies in Metro Vancouver

Unlike other provinces in Canada and other jurisdictions internationally, the current regulatory context in BC **does not allow inclusionary zoning** which would allow municipalities to set a required percentage of affordable housing directly into zoning requirements.

Instead, BC municipalities use “voluntary” inclusionary housing policies which encourage the delivery of affordable housing through private development by requiring a certain proportion of affordable units in exchange for additional density and other incentives. There is a wide variation in the inclusionary housing policies that exist across the Metro Vancouver region. And while some municipalities are not currently using inclusionary housing tools, some are using other tools to secure affordable/ non-market housing such as setting aside land, Community Amenity Contributions (CACs), etc.

Although all of the tools used in the Metro Vancouver region all share the common approach of using the zoning authority to encourage or require development of affordable housing units in connection with approval of a proposed market-rate project, they reflect considerable diversity in design and implementation. The design of each policy differs based on the intended objectives of the policy.

While all being “voluntary” programs, many are understood to be near mandatory in nature, given that current planning practice in BC relies so heavily on the rezoning process, and developers rarely build to base densities. In the following image, the current inclusionary housing programs in Metro Vancouver are organized by their scale from mandatory (less flexible in application) to voluntary (more flexible in application). The map on page 19 of this report shows which municipalities have inclusionary housing policies or programs, a similar incentive / density bonus policy which achieves inclusionary units, or have identified inclusionary housing as a future action.

# Existing inclusionary housing policies

Less Flexible



More Flexible

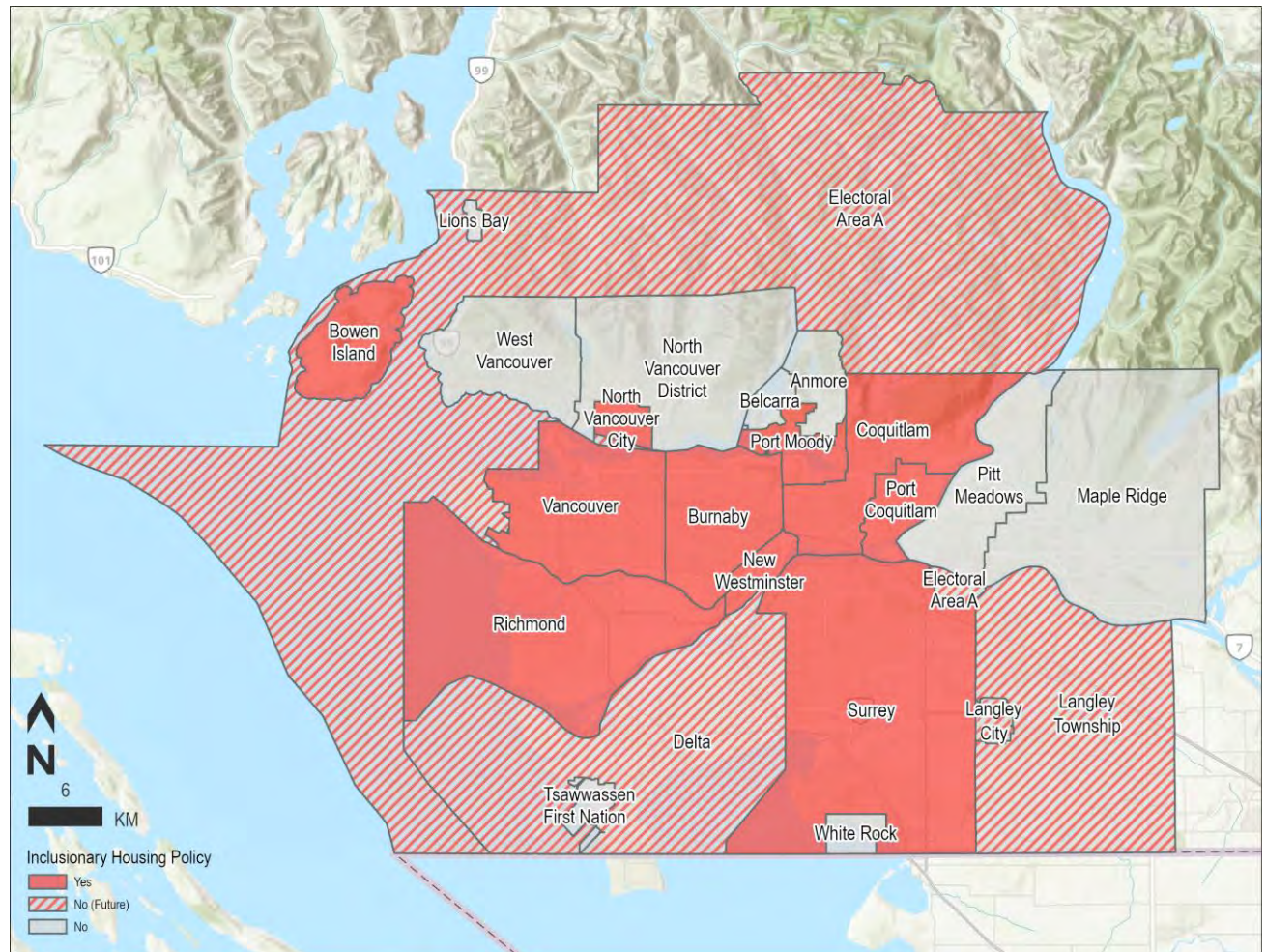
Inclusionary Zoning - Required Housing Contribution	Pre-Written Zone with Required Inclusionary Housing Contribution	Negotiated at rezoning with policy guidance	Negotiated at rezoning on case-by-case basis
<ul style="list-style-type: none"> <li>• <i>spot rezoning not required</i></li> <li>• <i>developer cannot opt out</i></li> </ul> <ul style="list-style-type: none"> <li>• Does not exist in BC currently</li> </ul>	<ul style="list-style-type: none"> <li>• <i>spot rezoning required</i></li> </ul> <ul style="list-style-type: none"> <li>• <b>Burnaby</b> Rental Use Zoning Policy</li> <li>• <b>Coquitlam*</b> Density Bonus Incentive for Priority Housing Types</li> <li>• <b>Port Coquitlam</b> Affordable and Family Friendly Policy</li> <li>• <b>Richmond</b> Low End Market Rental Program</li> <li>• <b>Vancouver</b> Below Market Rental Housing Policy for Rezoning</li> <li>• <b>Vancouver</b> Specific plan or area policies</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Bowen Island</b> Affordable Housing Policy</li> <li>• <b>City of North Vancouver</b> Mid-Market Rental Policy</li> <li>• <b>New Westminster</b> Inclusionary Housing Policy</li> <li>• <b>Port Moody</b> Inclusionary Zoning Policy</li> <li>• <b>Vancouver</b> Rezoning Policy for Sustainable Large Development</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Surrey*</b> Density Bonus Policy</li> <li>• <b>White Rock*</b> OCP policies 11.2.1 and 11.2.4 for Affordable Rental Housing requirements for rezonings</li> </ul>

\* Coquitlam, Surrey, and White Rock do not have inclusionary housing policies, but have a similar incentive / density bonus policy which achieves inclusionary units.

# Existing inclusionary housing policies/ practices in Metro Vancouver

## Metro Vancouver Member Jurisdictions with Inclusionary Housing Policies:

- 8 member jurisdictions have adopted official inclusionary housing policies or programs: Bowen Island, Burnaby, New Westminster, City of North Vancouver, Port Coquitlam, Port Moody, Richmond, and Vancouver
- 3 member jurisdictions have some similar incentive / density bonus policy which achieves inclusionary units: Coquitlam, Surrey and White Rock
- 4 member jurisdictions have identified inclusionary housing as a future action: Delta, Electoral Area A, Township of Langley, and City of Langley



# Existing inclusionary housing policies key features

The table below provides a summary of the key features of the existing inclusionary housing policies and programs that currently exist within the Metro Vancouver region.

<p><b>Unit set aside, affordability threshold</b></p>	<ul style="list-style-type: none"> <li>• Percent of affordable inclusionary units varies based on associated affordability level. Ranges from 5% of GFA or units (for deeply affordable units i.e., shelter rate and RGI units) to 30% of GFA or units (Vancouver: 20% social housing + 10% below market rental). Some policies have set-aside requirements that are calculated on bonus density (additional GFA), rather than the whole development GFA.</li> <li>• Some policies have different requirements for affordability and % unit set aside based on geography (i.e., more units required in central areas) and tenure type.</li> </ul>
<p><b>Length of affordability</b></p>	<ul style="list-style-type: none"> <li>• Majority of policies are for 60 years or life of the building.</li> </ul>
<p><b>Inclusionary housing in different tenure types</b></p>	<ul style="list-style-type: none"> <li>• Most existing policies in the region apply to either strata only developments or strata and mixed tenure developments. The only municipalities that expect inclusionary policies to apply for rental only buildings are the City of Vancouver and the City of North Vancouver.</li> </ul>
<p><b>Developer Incentives</b></p>	<ul style="list-style-type: none"> <li>• Existing policies in the region offer developers some type of incentive in exchange for providing affordable housing.</li> <li>• The most common incentive types offered to developers of affordable housing are: density bonusing, reduction in parking requirements, DCC waivers (or other waivers), prioritized application review.</li> </ul>
<p><b>Opt-out restrictions</b></p>	<ul style="list-style-type: none"> <li>• Cash in lieu option available in most but not all policies, usually for projects resulting in fewer than 3 or 4 inclusionary units.</li> </ul>
<p><b>Operating and management restrictions</b></p>	<ul style="list-style-type: none"> <li>• The most common operating/management requirement in the existing policies is for units to be managed by a not-for-profit, but the units can remain in the ownership of a private developer.</li> <li>• Most of the existing programs have annual reporting requirements. Annual reporting is important to ensure policy is functioning as it should, however it requires staff capacity to disseminate and assess the reports.</li> </ul>

# State of delivery of affordable rental housing in the Metro Vancouver region

## AFFORDABLE HOUSING NEED

There is an urgent need for affordable housing in Metro Vancouver, particularly affordable and secure rental housing. The provincial government is overhauling the planning framework in BC, and inclusionary housing represents a critical opportunity to ensure that new growth and density can simultaneously contribute to the provision of affordable homes.

The demand for rental housing is significantly outpacing the growth in supply and availability of rental units. Between the 2016 and 2021 Census periods, total renter households in Metro Vancouver increased by over 13% while the purpose-built rental stock increased by just 5.6%. At the same time, the average vacancy rate for rental apartments has remained consistently very low, while the viability of constructing new rental continues to be challenged by rising construction costs and interest rates, labour shortages, and significant inflation.

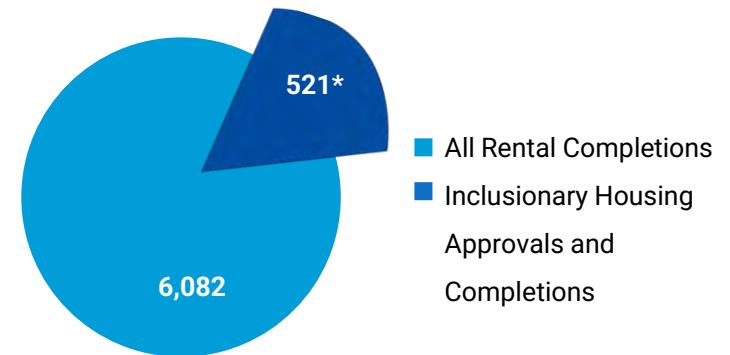
## BY THE NUMBERS

In 2022 there were **1,273** social housing completions in Metro Vancouver, out of a total of **6,082** rental housing completions.

On average, it is estimated that **521** (9%) Inclusionary Housing units were approved or completed in Metro Vancouver. It is estimated that of these units, approximately **174** were completed.

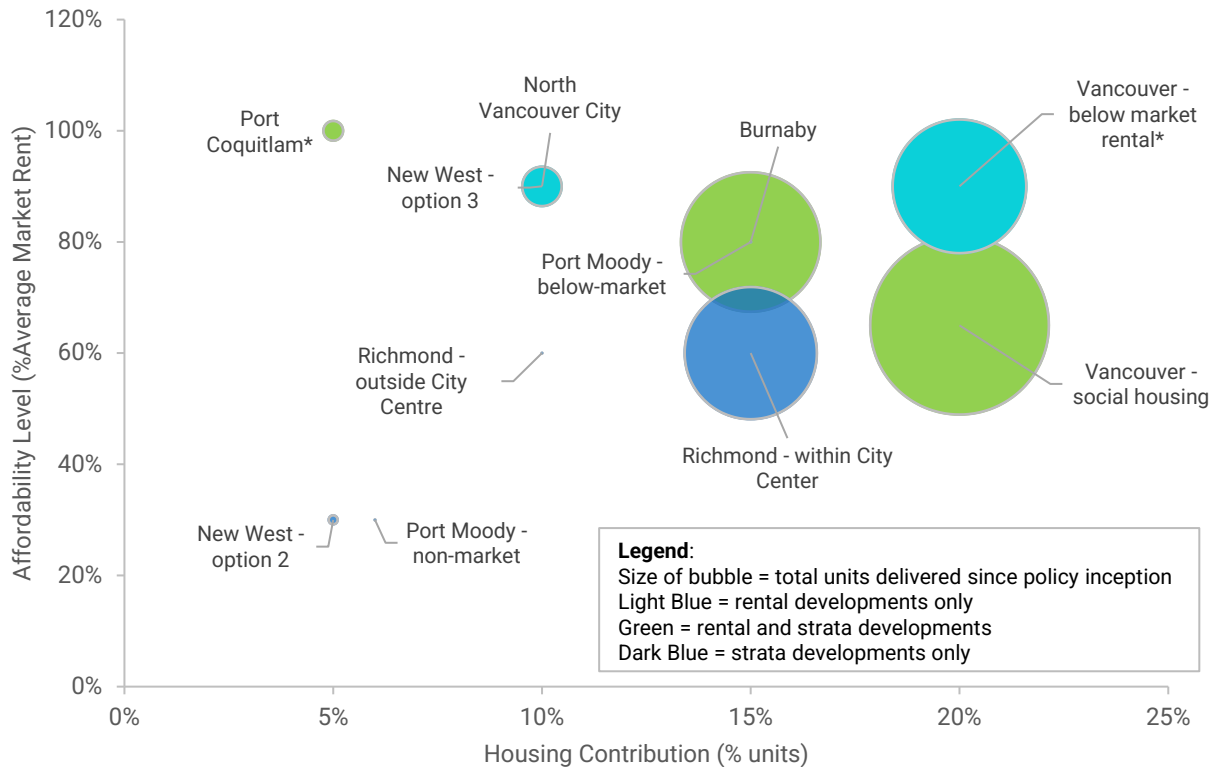
From 2007 to the present, Metro Vancouver has had approximately **6,190** inclusionary housing units approved under various jurisdictions' inclusionary housing policy frameworks. Additionally, **3,000** units have been either completed or in the construction process, resulting in a total of **9,190** inclusionary housing units delivered across the region from inclusionary housing policies. The chart on the next page demonstrates the scale of inclusionary housing units delivered by municipality.

**Figure 1:** Estimated Inclusionary housing approvals and completions in an average year, compared to total rental completions in Metro Vancouver in 2022



\*Includes inclusionary housing approvals and completions, actual completions are estimated to be 1/3 of total approved/completed, or ~174 units.

**Figure 2: Inclusionary Housing Policies Across Metro Vancouver with Total Units Delivered (Completed, Approved, or In-Stream) since Policy Inception (Dates Vary)**



**Note:** The Affordability Level (% Average Market Rent) on the vertical axis is calculated using the 2022 Vancouver CMA average market rent for all units as reported in the 2023 CMHC Rental Market Report.

**INCLUSIONARY HOUSING OUTCOMES**

- Eight jurisdictions have IH policies
- Six jurisdictions have delivered IH units to date
  - Vancouver
  - Burnaby
  - Richmond
  - City of North Vancouver
  - Port Coquitlam
  - New Westminster
- The majority of units were:
  - In stronger markets
  - In mixed-tenure developments
  - At higher rents (higher %AMR)
- Since policy inception (dates vary), approximately 9,200 inclusionary units have been delivered in the region (approved or completed)

# Legislative Context

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This section provides an overview of legislative environment for introducing new inclusionary housing policies.

# Provincial legislative changes

## LEGISLATIVE CHANGES RELATING TO HOUSING

The suite of legislative changes introduced by the province will introduce new minimum standards for height and density near transit, and shift municipalities toward a pro-active planning framework, requiring pre-zoning for 20 years of housing needs. Bill 47 (Transit-Oriented Areas) will require local governments to set minimum heights and densities for housing within defined transit-oriented development areas but have not included any consideration for securing affordable housing units within these new base densities.

The province has estimated that changes resulting from these legislative changes could lead to approximately 100,000 new housing units being built in TOD areas over the next decade, according to provincial estimates. However, the legislation has no requirements related to the provision of affordability or non-market housing. Rather, the focus is more on increasing housing supply in general.

In current planning practice, municipalities contribute to housing objectives by capturing a portion of the additional land value created through rezoning to contribute towards affordable housing. In fact, many of the existing inclusionary housing policies in the region are tied to rezoning.

Unlike other jurisdictions in Canada and abroad, the current regulatory context in British Columbia does not allow inclusionary zoning which would allow municipalities to set a required percentage of affordable housing to be provided directly as part of zoning requirements. There is a substantial risk that the new legislation will reduce the ability of municipalities to generate much needed non-market/affordable housing units through new development, without expanding the tools for local governments to request an inclusionary zoning contribution through as-of-right development.

The legislation risks removing or curtailing several key tools that are currently used to deliver affordability in our region: contributions to affordable housing reserve funds (through CACs negotiated through rezoning) and the direct delivery of affordable units by the private sector (through rezoning).

**Common practices, like funding affordable housing through CACs, or securing affordable housing units through rezoning, have not been addressed under the new framework. Introducing enabling legislation for inclusionary zoning is an opportunity for the province to address this gap.**



# Provincial legislative changes

## Summary of Bills 44 and 47 (2023)

### BILL 44, 2023

B.C. is shifting to a pro-active, long-term approach to planning that is focused on identifying housing needs and zoning accordingly. As a result, the Housing Statutes (Residential Development) Amendment Act (Bill 44, 2023) was passed, requiring Housing Needs Reports (HNRs) to be updated using a standard method estimating housing needs for 20 years – rather than the previously required 5 years.

Pre-zoning for 20 years of housing need provides an opportunity for municipalities to introduce inclusionary zoning frameworks in order to dedicate a percentage of developments on pre-zoned land towards affordable housing, thus “capturing” the additional value created through pre-zoning .

### BILL 47, 2023

The Housing Statutes (Transit-Oriented Areas) Amendment Act (Bill 47, 2023) requires that municipalities designate Transit Oriented Development Areas (TOD Areas) near transit hubs.

TOD Areas are defined as land within 900 metres of a rapid transit station and within 400 metres of a bus exchange.

In TOD Areas, municipalities will be required to permit housing development that meets provincial standard for allowable height and density (see Figure 1).

Figure 3: Transit-Oriented Areas Types in British Columbia, 2023

Transit Oriented Development Areas – Policy Framework					
TOA Type	Transit Hub Type	Prescribed Distance	Minimum Allowable Density (FAR)	Minimum Allowable Height (Storeys)	Type of Building
TOA Type 1 (Metro Vancouver)	1A) Rapid Transit	200m or less	Up to 5.0	Up to 20	Condo Tower
		201m – 400m	Up to 4.0	Up to 12	High Rise, Mid-rise
		401m – 800m	Up to 3.0	Up to 8	Mid-rise
TOA Type 1 (Metro Vancouver)	1B) Bus Exchange	200m or less	Up to 4.0	Up to 12	High Rise, Mid Rise
		201m – 400m	Up to 3.0	Up to 8	Low-rise, Townhouse
TOA Type 2 (Victoria/Kelowna/Other Medium-Sized Munis)	Bus Exchange	200m or less	Up to 3.5	Up to 10	Mid-rise
		201m – 400m	Up to 2.5	Up to 6	Low-rise/Townhouse
TOA Type 3 Other qualifying areas	Bus Exchange	200m or less	Up to 2.5	Up to 6	Low-rise
		201m – 400m	Up to 1.5	Up to 4	Townhouse

# Stakeholder Feedback

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This section provides a summary of the feedback received from consultations with a broad range of housing stakeholders in Metro Vancouver regarding what is working well and what the challenges are with the existing inclusionary housing policy frameworks in Metro Vancouver.

# Stakeholder feedback

A number of interviews with a broad range of housing stakeholders in Metro Vancouver were conducted as part of this study. These interviews were conducted with private developers and non-profit housing providers/developers. Interviews were conducted virtually throughout September and October of 2023.

Each interview helped to answer one or more of the following lines of inquiry:

- How **effective** are the current inclusionary housing policies across the Metro Vancouver region?
- What are some recent **success stories** related to the inclusionary housing policies across the Metro Vancouver region? What elements of the current policies should remain in the future?
- What are the **current challenges** faced by private developers and non-profit housing providers/developers interacting with the inclusionary housing policies across the Metro Vancouver region? How can these policies be improved in the future?
- How might the Metro Vancouver Regional District **develop an achievable and impactful regional model** inclusionary housing policy that achieves the desired outcomes?

The feedback provided through these key stakeholder consultations has been considered in the development of the recommended policy framework. The following pages highlight what we heard through consultations in terms of what is working well and what the challenges are with the existing inclusionary housing policy frameworks.

# What we heard

## What's working well?

**Inclusionary housing policies that are predictable and consistent are the most effective.**

**Often denser housing types (mid-rise, high-rise buildings) are the most feasible housing type for inclusionary housing policies to be applied to and be successful**

**The best designed policies take into account market conditions and are assessed and revised consistently. The policies are adjusted to reflect changes in construction costs, interest rates, demand, and other economic conditions which impact developers' abilities to build affordable housing.**

**A phase-in window prior to a policy coming into effect provides the development community time to adjust.**

# What we heard

## What are the challenges?

Stakeholders (such as developers) have expressed that many of the existing policies are more challenging to navigate than they should be, in order to be effective.

Some of the affordability thresholds are too high and do not allow for feasible projects in many jurisdictions in the region, according to developers.

Developers do not find the density bonuses and other incentives currently being offered sufficient to create a meaningful number of new affordable units in the current market where construction costs are very high and interest rates are rising. Policies are designed for a moment in time and are inflexible to deal with changes in market conditions.

There is often a mismatch between the types of units constructed in the building and the needs of the not-for-profit. Early engagement between private developers and non-profits would enhance the ability to create a design that works for an operator.

# Why the need for an Inclusionary Housing Model Policy Framework?

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# Why create a model policy framework?

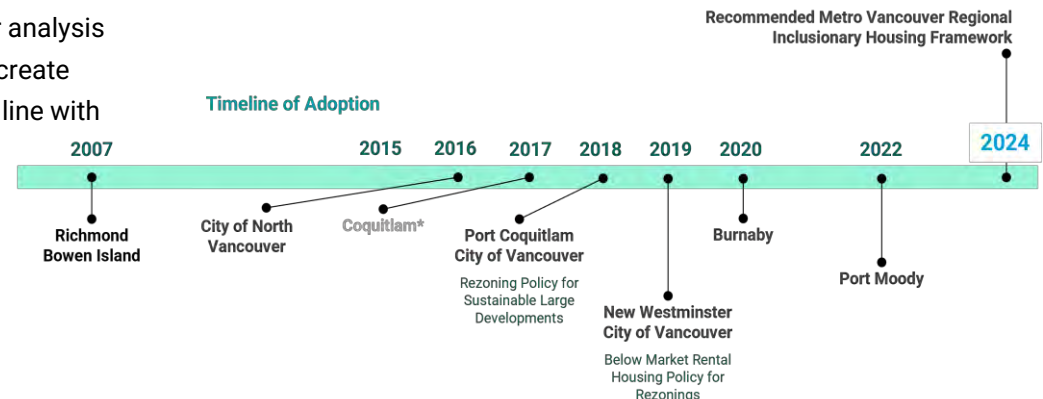
Various inclusionary housing policy frameworks have been implemented throughout Metro Vancouver since 2007, with eight jurisdictions currently having an in-force policy and three others that have similar incentive / density bonus policy which achieves inclusionary units.

Some of the municipalities have policies that are based on specific neighbourhoods, and others have multiple options depending on the type of development or rezoning type. Some policy frameworks include requirements in pre-written zones (with spot rezoning required) and others are negotiated on a case-by-case basis when a rezoning is required. This creates inconsistency in terms of applicability of inclusionary housing across the region and adds additional risk for the development industry. It also creates uncertainty about the goals and outcomes of the various policies for the public and elected officials.

A model inclusionary housing policy framework based on clear analysis and evidence and reflecting stakeholder feedback, would help create consistency across the region, ensure that requirements are in line with current market conditions, and provide the foundation to take inclusionary housing policies a step forward across the region.

A model policy that can be implemented across multiple municipalities also creates a case for enabling inclusionary zoning legislation by Province, which would allow for mandatory affordable housing requirements to be included in base development permissions (zoning), including where development approval is not required. For instance, this would apply to areas where municipalities have pre-zoned to higher densities to meet provincial requirements.

The existing inclusionary housing policies have had mixed success in creating new affordable units. Creating a consistent robust policy framework for the region could support municipalities to implement the tool in the most effective way by improving the existing policies and enabling areas without policies to introduce new inclusionary housing policies that would be seamless for the development industry and affordable housing providers to understand and participate in.



# 2 Financial Impact Assessment

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# Inclusionary housing

## Impacts on development

In very general terms, inclusionary housing policies fundamentally reduce the economic value of a development project. Inclusionary housing policies encourage or require developers to develop some number of affordable housing units in connection with a proposed market-rate development project. Naturally, these affordable units will be listed at lower prices than market-rate units and as such, will earn the developer less revenue than their market-rate counterparts. Under an inclusionary housing policy, the developer's projected revenue loss has the same effect on a developer's bottom line as an increase in construction costs or the payment of a fee. This dynamic has the effect of reducing the value of the residential development project.

There are four factors that must intersect for real estate development to be feasible. These factors are: public policy, market feasibility, capital, and land. Public policy relates to the zoning, density, and design requirements for a project at a specific site. For development to be economically feasible, policy must allow the developer to build a profitable product. To achieve this, a developer must be able to achieve sufficient levels of revenue. Market feasibility relates to whether the potential revenues generated by a development project can cover the costs to develop the project.

With regards to capital, developers are concerned with both the capital costs and the availability of capital financing. A developer needs to be able to access the resources for development, including equity investment, bank loans, or other sources of funds. Development feasibility is also contingent on the cost and availability of land. For a development to be economically feasible, a developer must be able to purchase an appropriate site for a reasonable acquisition cost.

When all four of these factors intersect, a real estate development project is economically feasible for a developer to pursue. Development will continue to occur under inclusionary housing if the revenues for the market-rate units are high enough to cover the lost value from including affordable housing units in the project. Because the success of an inclusionary housing policy depends on market-rate development, these policies only work when new development is occurring.

Undertaking a financial feasibility analysis is critical for understanding the impacts inclusionary housing policies can have on the supply of housing. This involves analyzing current local development economics to demonstrate how much "prototypical" projects can realistically support the costs associated with the provision of affordable housing under different inclusionary housing policy designs, without affecting development viability to the point where development will not take place. In economic feasibility analyses, policymakers can test the trade-offs between the key policy features.

# Residual Land Value (RLV) Analysis Methodology

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This section provides an overview of the methodology used to test the impact of various inclusionary housing policy parameters.

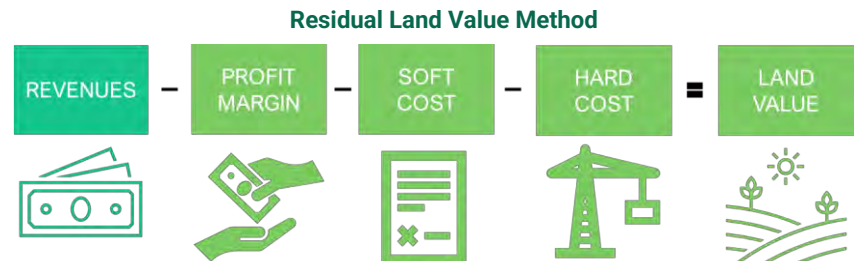
# Financial impact analysis methodology

## RESIDUAL LAND VALUE ANALYSIS

This study used a residual land value (RLV) analysis to determine how much inclusionary housing can be provided through the additional value created through an upzoning and subsequent development of a set of conceptual sites.

“Residual land value” analysis is the method which is often used to determine the value a developer would be willing to pay for land for a project. This valuation technique is based on the understanding that land is valuable because of the utility it provides people. The residual land value method says that the maximum a developer would be willing to pay for land for a project would be “just enough so that the land cost plus the cost of improving the land exactly equals the expected proceeds of selling/renting the property”.\* The cost of improving the land includes the hard costs (which include labour, materials, etc.), soft costs (which include financing costs, municipal fees and charges, etc.), and the developer’s profit margin. The maximum payment for the land is therefore the amount of the revenues that is left over after paying all these costs of development. The value of land under this appraisal method is therefore a residual amount resulting from the improvement of land.

Any improvement that increases the value of the land’s final use increases the land residual. In contrast, any market changes or interventions which reduce revenues (or increase the costs to develop) will reduce the land residual. In the context where an inclusionary housing policy is introduced, the direct impact of the inclusionary housing policy would be to reduce developer revenues. Development costs and profit are considered fixed as developers already maximize cost reductions and are mostly not willing to reduce their profit margins. Therefore, this method assumes that reductions in revenue will lead to indirect negative impacts on land values since less funds will be available to purchase land. In the long run, the cost burden of an inclusionary housing policy is therefore capitalized into decreased values of residential land.

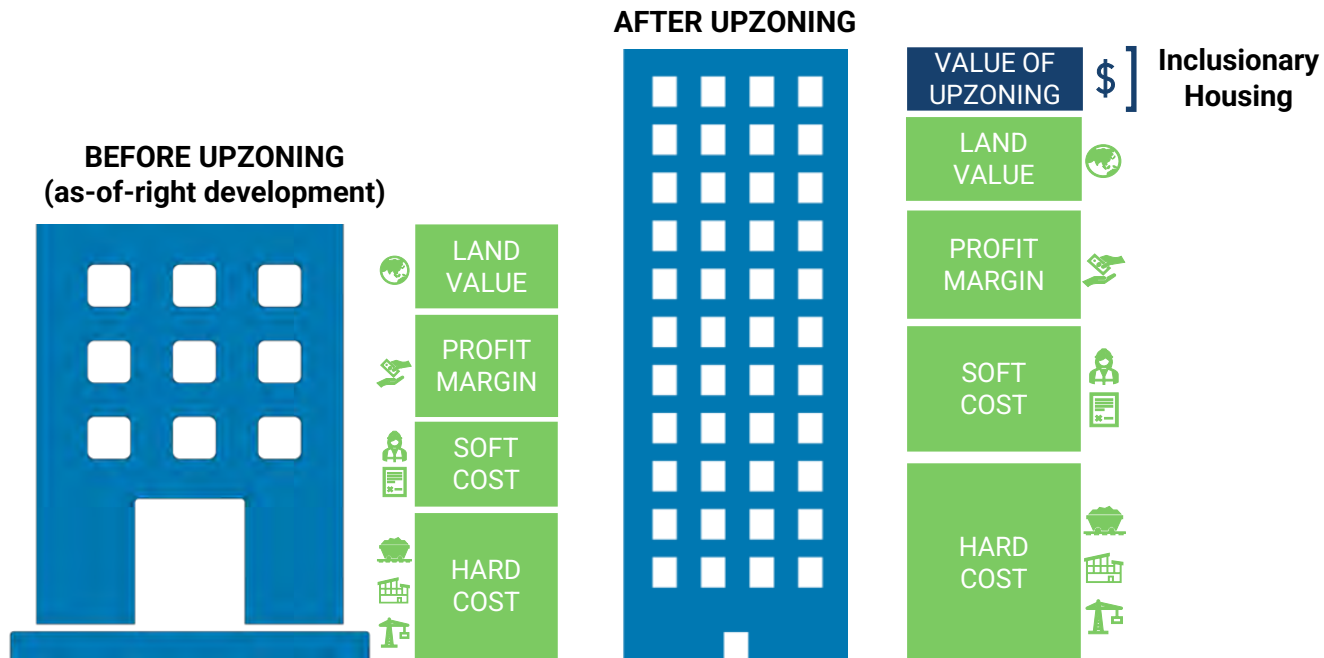


\*University of British Columbia, Sauder School of Business. [Developer's Residual Method of Appraisal](#)

# Upzoning and residual land values

In the illustration below, the site has been upzoned and may construct a greater number of units in exchange for setting aside a certain percentage of those units for inclusionary housing. In the illustration, the increase in hard costs, soft costs, and profit margins (shown in the figure on the right) are proportional to the amount of upzoning, with or without inclusionary housing. Upzoning creates both additional revenue and costs, but in strong markets the revenue can exceed the costs and baseline profit amount. It is this “residual” value that can be used to create new inclusionary housing units.

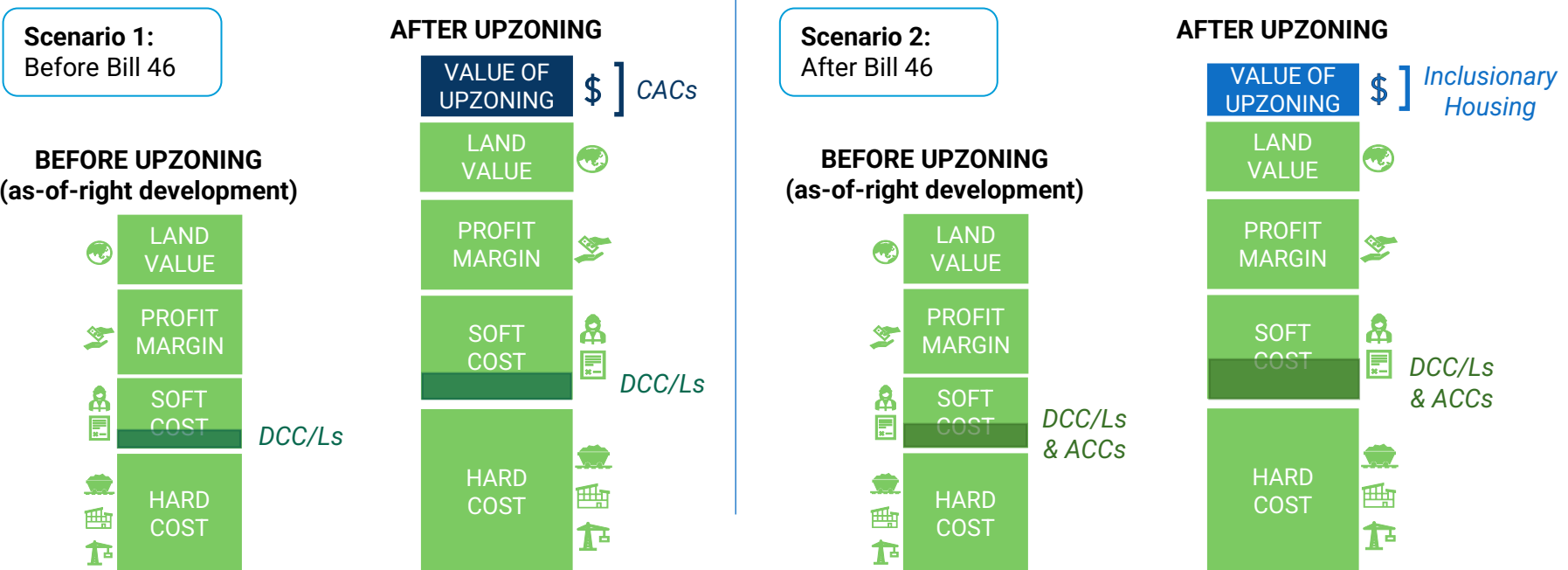
The inclusionary housing units generate lower revenue than the market units that would have been created without an inclusionary housing policy. As the revenues decrease under an inclusionary housing policy, how much the proponent can afford to pay for the land, the residual land value, decreases. When the residual land value matches the current land prices, it will become more difficult for new projects to purchase land, and new projects may be delayed. Each affordable unit creates a measurable reduction in residual land value. Modelling different inclusionary housing policy requirements, such as the unit set aside rate and depth of affordability, provides insight into how much inclusionary housing can be supported in the current development market.



# CACs, ACCs and Affordable Housing

Bill 46, the *Housing Statutes (Development Financing) Amendment Act, 2023*, transitioned the Province away from Community Amenity Contributions (CACs) and towards Amenity Cost Charges (ACCs). The legislation also expanded the scope of Development Cost Charges (DCCs) and Development Cost Levies (DCLs) to include fire protection, police, and solid waste facilities, as well as cost-sharing for provincial highways.

CACs operated as an in-kind or cash contribution by property developers and were negotiated on a case-by-case basis upon the granting of development rights through re-zoning. Bill 46 introduced ACCs, enabling municipalities to standardize fees for contributions towards community benefit and amenities. ACCs collect funds for community resources such as community centres, recreation centres, daycares, and libraries. Certain developments, including affordable housing developments, are exempt from ACCs. However, in the case of inclusionary housing and inclusionary zoning, the market-rate portion of the development will still be subject to ACCs. The illustration below demonstrates how post Bill 46, an ACC charge would be considered a soft cost in the context of the financial impact analysis undertaken for this study, while the resulting value of the upzoning (which may be impacted by increased soft costs) could be directed towards supporting inclusionary housing/inclusionary zoning.



# Residual Land Value (RLV) Analysis Scenario Variables

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This section provides a summary of the assumptions, market variables, and built form typologies included within the RLV analysis.

# RLV analysis

## Development scenario variables

### BUILT FORM AND DENSITY

A combination of development scenarios were tested that included:

- 3 built forms: High Rise, Mid Rise and Low Rise Apartment with 350, 200 and 100 units, respectively; and
- the High Rise and Mid Rise buildings were assumed to be concrete construction, and wood construction for the Low Rise apartment.

### BUILDING TENURE

Only strata or condominium buildings were tested, because the purpose-built rental market is currently very challenging to achieve a viable project.

The affordable units were assumed to be rental, though scenarios were tested where the units are purchased by a not-for-profit housing provider and subsequently rented to their clients.

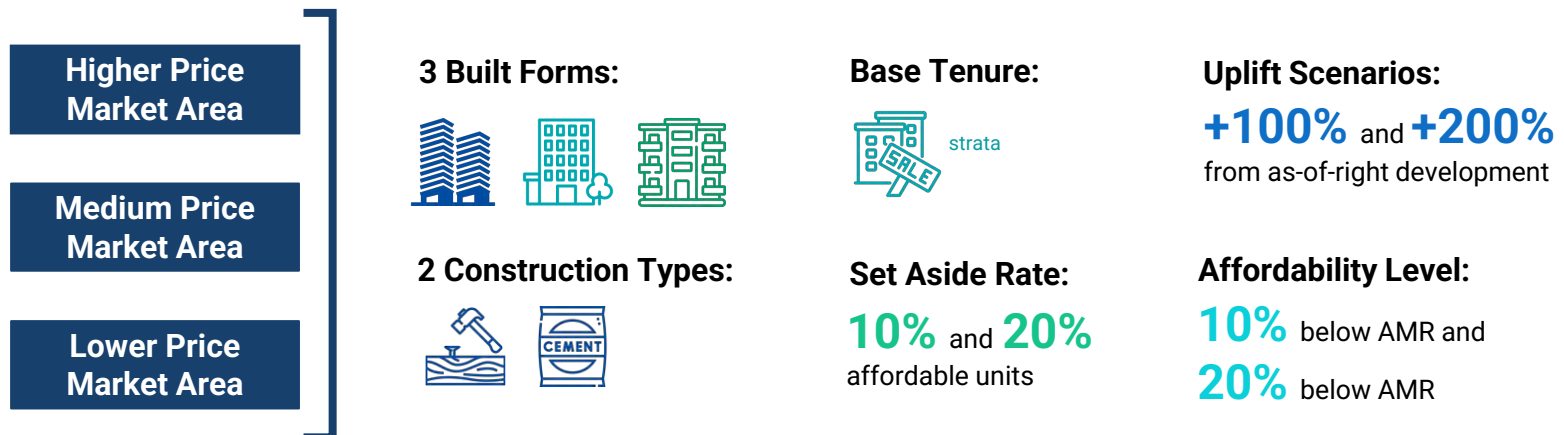
### UPZONING AMOUNT

An assumption going into the analysis was that increasing the density for a site would provide substantial additional opportunity for providing inclusionary housing. Upzoning amounts of 100% and 200% from as-of-right density were modelled.

### SET ASIDE & AFFORDABILITY

The amount of inclusionary housing is commonly referred to as the “set aside rate” and is a percentage of the units or gross floor area in the building. Set aside rates of 10% and 20% were modelled.

Affordable rental is commonly measured against what the average market rent that is reported by CMHC in their annual purpose-built rental market survey. We analyzed the results for 10% below average market rent (AMR) and 20% below AMR.



# RLV analysis

## Cost to develop

The cost of improving the land includes the hard costs, soft costs, land costs and the developer's profit margin. The key costs that were included in the analysis are provided below.

### HARD COSTS

Hard costs include the costs associated with constructing the physical building, which includes materials and labour.

The individual components of the hard costs might include:

- Base Construction Cost of the building
- Parking Construction Cost
- Site Servicing
- Appliances, Furnishings, and Equipment
- Contingency

There are several factors that impact the hard costs of a project. These are often based on the site, as well as the design, size, and height of the building. For this project, most hard costs were based on the 2023 Altus Cost Guide for multi-residential development in the Metro Vancouver Area (MVR). With the IZ percentage being a proportion of the gross floor area (GFA), changing the hard costs will have a proportional impact when IZ is applied – the percentage decrease in viability due to IH will stay mostly the same as costs increase. In addition, hard cost assumptions were verified with developers in Metro Vancouver.

### SOFT COSTS

Soft costs include the costs associated with planning the development, managing the construction project, acquiring development approvals, and building permits.

The individual components include:

- Professional Fees including architect, engineer, cost consultant (Quantity Surveyor), planning consultant, and other consultant fees
- Site Studies
- Real Estate Agent Sales Commission Fee for ownership units
- Legal Fees
- Marketing Costs for rental units
- Property taxes during construction
- Financing Costs
- Fees and Permits including Municipal and Regional Planning Application fees, Building Permit fees, Development Charges, Parkland Dedication fees

Like hard costs, soft costs are largely dependent on the type of building, sites, and other development specifications. For this study, soft costs were determined based on desk research and SHS Consulting's considerable development experience. These assumptions were also verified with developers in Metro Vancouver.

### LAND COSTS

In this study project profitability is measured as a proportion of the total project value, with a viable project achieving 15% profit on the total project revenues. SHS has used a 15% profit margin in multiple inclusionary zoning analysis projects, with the development industry in each community finding it an acceptable benchmark rate.



# Built form typologies

## BUILT FORM AND DENSITY

Details for the three prototype developments that were modelled are shown in this figure.

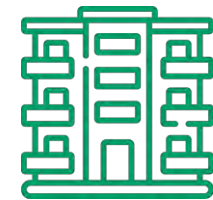
With the intent of having a policy that can be adopted widely across the region, ultra-high rise buildings (60+ storeys) were not included in the analysis.



High Rise  
32 Storeys



Mid Rise  
10 Storeys



Low Rise Apartment  
6 Storeys

Units	350 Units	200 Units	100 Units
Construction Type	Concrete	Concrete	Wood Framed
Site Size	0.75 hectares	0.75 hectares	0.4 hectares
Podium Size	1,525m <sup>2</sup> 6 Storeys	1,184m <sup>2</sup> 10 Storeys	1,590m <sup>2</sup> 6 Storeys
Tower Size	800m <sup>2</sup>	N/A	N/A

# Construction costs and unit sizes

## CONSTRUCTION COSTS

The construction costs in this figure represent the range of values between the low-end and high-end of the Altus Cost Guide for Vancouver for 2023. The Unit Costs are the resulting per-square foot total cost (soft + hard costs) for the finished units, using the low and high ends of the cost range.

## UNIT SIZES

The unit sizes for market units are based on a 2023 report by CMHC on average unit sizes in Vancouver and Toronto<sup>1</sup>.

For this analysis, the affordable unit sizes were increased by 10% to account for accessibility features. An inclusionary housing policy can specify the unit sizes, though having radically different unit sizes from the market units can create challenges when designing efficient building floor plates which can result in additional development and construction costs.

		Construction Cost (per sq-ft)	Unit Cost (per sq-ft)
Built Form	High Rise 	\$ 330 - \$ 400	\$ 870 - \$ 970
	Mid Rise 	\$ 310 - \$ 380	\$ 837 - \$ 937
	Low Rise Apartment 	\$ 245 - \$ 350	\$ 734 - \$ 863
Unit Sizes	 Apartment Unit Size (sq-ft)	Apartment Unit Size (sq-ft)	Affordable Unit Size (sq-ft)
	One-Bedroom	660	730
	Two-Bedrooms	815	900
	Three-Bedrooms	1,150	1,270

1. CMHC 2023. <https://www.statcan.gc.ca/o1/en/plus/3237-condo-market-toronto-and-vancouver-home-investment-and-increasingly-rental-property>

# RLV Analysis

## Local Housing Markets

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This section provides an overview of the housing market assumptions used in the RLV analysis.

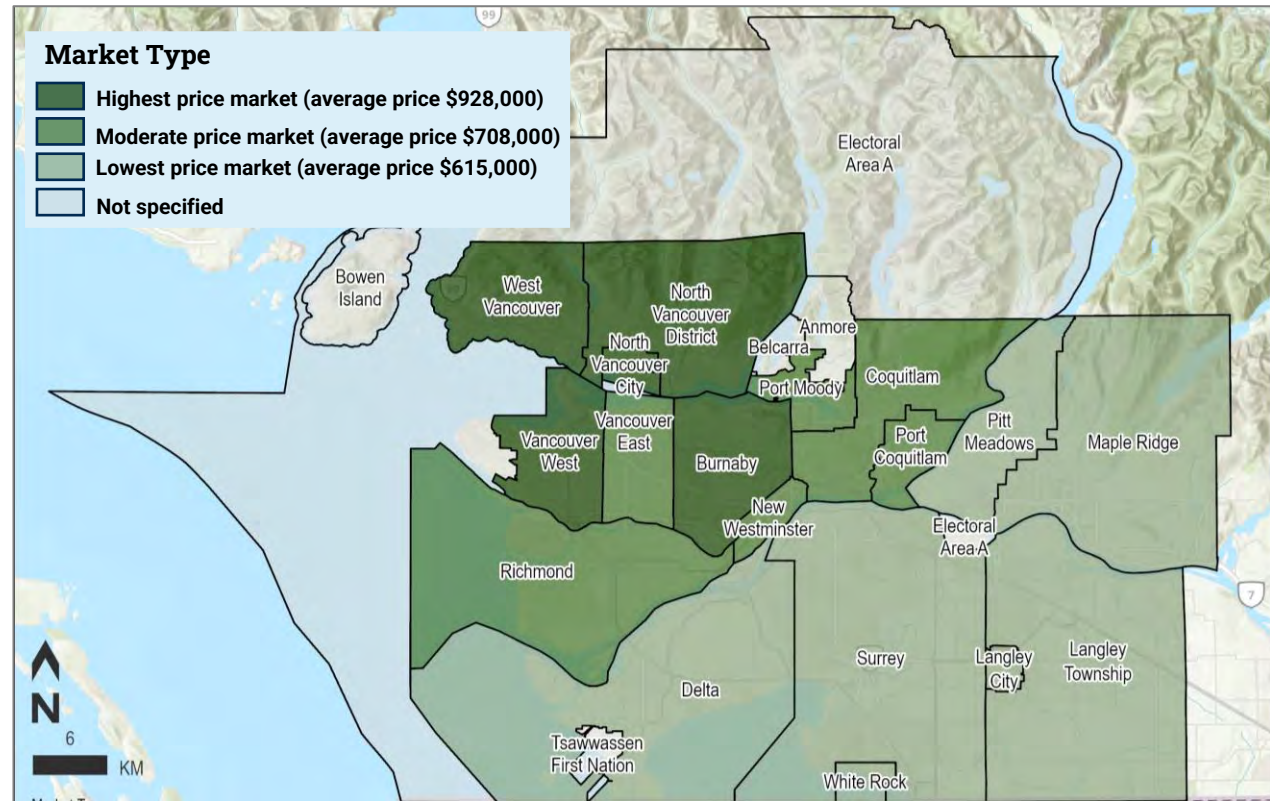
# Metro Vancouver housing markets

## HOUSING MARKETS

For our analysis we have divided the region into 3 broad housing markets based on recent housing sales prices; which suggest the strength of the strata development environment for each community.

The highest priced housing markets were: West Vancouver, North Vancouver, Vancouver West and Burnaby. Communities that have moderate pricing include: Richmond, Vancouver East, New Westminster, Port Moody, Coquitlam and Port Coquitlam.

The lowest priced housing markets have seen rapid increases in strata unit prices but remain priced much lower than units in the highest priced areas. The lower-priced communities include: Delta, Surrey, White Rock, Pitt Meadows, Maple Ridge and Langley.



The impact of potential inclusionary housing policies were tested in the three markets, using pricing near the average for ownership and rental in each area. In general, higher priced housing markets are better able to absorb inclusionary housing requirements, with the additional density from upzoning providing significant additional profits. The amount of additional value is driven by the difference between project construction costs and the sales prices of the units.

# Representative markets / revenue potential

## HOUSING PRICES

Three housing markets were identified across Metro Vancouver, as shown in the previous page with the map of the region. The prices shown in this table represent values that are near the middle of the range for each market.

The medium or moderate priced market has prices that are approximately 10% lower than the highest priced market, and the lowest priced market area has prices that are approximately 30% below the prices in the higher priced market.

When using the information in this analysis, each municipality, or community, should assess which housing market their current housing prices align with. The lower priced market areas have seen rapid increases in prices over the last 5 years, which is eroding affordability in those communities, but the total prices still remain significantly lower than those seen in the communities with the highest prices. Inclusionary housing is a tool that could help mitigate the affordability losses in the lower priced markets, going forward.

		Higher Price Market Area	Medium Price Market Area	Lower Price Market Area
Ownership Prices <sup>1</sup> (2023)	1 Bedroom	\$ 826,600	\$ 752,600	\$ 596,400
	2 Bedroom	\$ 926,500	\$ 843,500	\$ 668,500
	3 Bedroom	\$ 1,176,600	\$ 1,071,200	\$ 849,000
AMR <sup>2</sup> (2023)	Bachelor	\$ 1,351	\$ 1,185	\$ 1,099
	1 Bedroom	\$ 1,643	\$ 1,459	\$ 1,365
	2 Bedroom	\$ 2,057	\$ 1,839	\$ 1,531
	3 Bedroom	\$ 3,308	\$ 2,376	\$ 1,675

<sup>1</sup> – Adapted from data in the Metro Vancouver Housing Data Book 2022 Table 3.3.4 (Metro Vancouver)

<sup>2</sup> – Average Market Rent (AMR) for occupied units according to CMHC Rental Market Survey, 2022, (Table 4.4), (CMHC)

# Financial Analysis Results

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This section includes an explanation of the key considerations that impact the financial analysis and provides an overview of the results of the RLV analysis and financial impact assessment

# Financial analysis

## Key Considerations

The analysis of potential residential developments in a housing market enables identification of the key factors that are enabling or impeding development. The key variables for this analysis were the impact of recent construction cost increases on overall project viability, how construction costs are related to potential pricing, and the large range of sales and rental prices across the region.

### CONSTRUCTION COST INCREASES

**Current construction costs are creating a difficult environment for all types of development.**

Construction costs have increased by approximately 20% between 2021 and 2023, based on the information in the Altus cost guide. This rapid increase in costs must be offset by increased revenues for projects to be financially viable.

Using the high end costs, almost no projects were viable based on current sales and rental prices in the region. Even with the low-end costs, none of the prototype projects in the lowest priced markets were viable.

This indicates that the residential development market is currently under some amount of stress, that is independent of any inclusionary housing policy.

### RANGE OF SALES AND RENTAL PRICES

**Local condominium prices vary widely across Metro Vancouver**

The medium or moderate priced market has prices that are approximately 10% lower than the highest priced market, and the lowest priced market area has prices that are approximately 30% below the prices in the higher priced market.

This suggests that even after the rapid increase in prices in the lower-priced markets, there may be some price elasticity (room for prices to rise) and that the potential revenue of the modelled projects is likely higher than forecast, and therefore the ability to support inclusionary housing is somewhat higher than the financial analysis suggests.

### CONSTRUCTION COST & REVENUE POTENTIAL

Construction across the region will vary in cost per square foot. Projects that use the high-end costs, and higher-end finishings are also likely to attract higher prices, with lower construction cost units generally attracting lower prices. This suggests that the RLV differences between the higher and lower construction costs are smaller than the analysis may suggest – lower sales prices would reduce the RLV for the lower- cost projects, and higher sales prices may offset some of the additional costs assumed in the high-end construction costs.

The cost difference for 6-storey wood construction is approximately \$105 psf, and for concrete construction the range is \$70 psf.

# Financial Analysis

## Policy Considerations

### KEY PROJECT VARIABLES IMPACTING VIABILITY

There has been a rapid rise in construction costs across Canada in the last three to five years. Preliminary analysis using the high end of the Altus 2023 cost guide resulted in few scenarios showing viable projects.

Interest rates have also risen through 2023, which affects both the ability for a household to buy a strata unit, and the cost to the developer to borrow funds during construction. Higher interest rates reduce project viability by applying downward pressure on sales prices and increasing carrying costs during construction.

Variability in local prices for new strata units also affects the viability analysis, with the moderate market areas having prices approximately 10% below the highest prices markets, and the lowest priced markets are approximately 30% below the higher costs markets.

Overall, these factors result in few projects showing strong viability results, but the intent of an IH policy is to capture some of the value from new construction when the market is profitable. A future-looking scenario has been undertaken to demonstrate potential future viability. Implementing an IH policy now means that affordable units will be attained when the market adjusts.

### CURRENT MARKET CONDITIONS AND CONTEXT

Developers across the country are facing construction cost increases which are likely contributing to slower real estate development. The cost constraints include shortage of workers, particularly in the skilled trades, a stagnant supply of raw materials, and other increased input costs. In addition to the higher materials costs, in many places across the country soft costs such as development charges have also risen. Amid these conditions, municipalities and other levels of government will need to keep policy in line with the broader goal of improving housing affordability without enacting policies that make development infeasible.

While the inclusionary housing set aside amounts and depth of affordability that were modelled in this analysis are lower than some of the existing policies in the region, it should be acknowledged that this study was based on a point in time analysis of the overall regional context and representative markets. Significant variation may exist on municipal and neighbourhood levels, and more localized analysis may yield different results. As such, the recommendations within this report reflect the minimum policy requirements that could be implemented across the region. Further analysis on a local level is recommended to support municipalities who want to request deeper affordability or higher set aside rates based on their local context.



# Financial Analysis

## Stakeholder Feedback & Project Viability

### STAKEHOLDER FEEDBACK

Stakeholder feedback indicated that where inclusionary housing policies exist, projects are at even higher risk of being non-viable than in other parts of the region without IH policies. With the multi-faceted pressures developers are experiencing on residential project viability, more conservative inclusionary housing set aside amounts and depths of affordability were considered in this analysis.

### VIABILITY BASED ON RLV

This residual land value analysis provides insight into the strength of the existing housing development market, the amount of value that can be created through upzoning and the impact of various inclusionary housing policies on potential project revenues.

A scenario is considered “viable” for development if the hard and soft project costs can be paid, as well as being able to afford the current cost to acquire land.

An RLV analysis can still be used to measure the impact of inclusionary housing, even when the scenario without inclusionary housing is not viable. The reduction in RLV provides insight into how much the industry needs to improve before the given policy could be implemented.

### MINIMUM LAND VALUE

The chart on [page 51 of this report](#) highlights which scenarios achieve at least 10% RLV, which is assumed as the minimum land cost in a typical development. Any additional value achieved beyond the 10% RLV (meaning 10% of the project being spent on land costs) could be used for inclusionary housing.

Projects that have a RLV between 0% and 10% could be viable under some circumstances, where land has already been acquired, a lower profit margin is acceptable, lower costs can be achieved, or higher prices realized.

Projects with negative RLV are very unlikely to proceed.

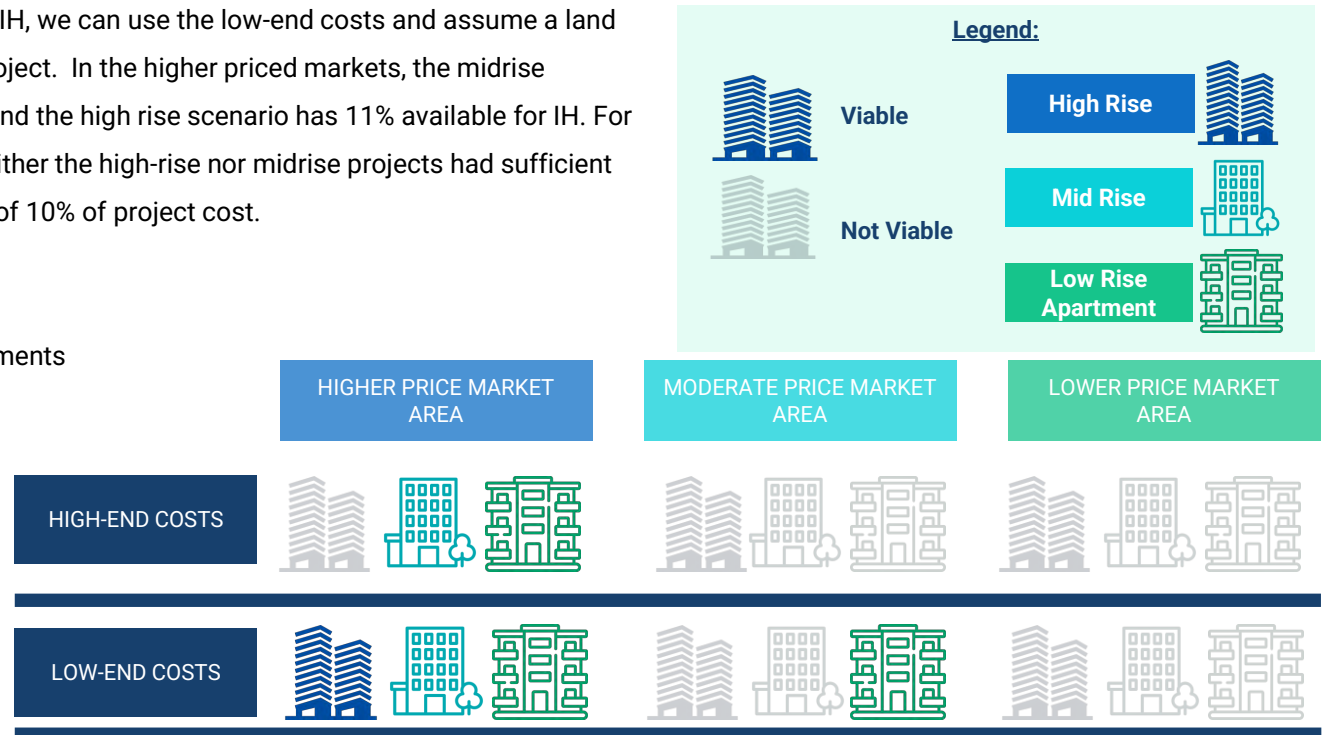
# Inclusionary housing opportunity across Metro Vancouver

## INCLUSIONARY HOUSING OPPORTUNITY

There is substantial difference in the opportunity for Inclusionary Housing (IH) when the range of construction costs are considered. Using the high end of the range, very few scenarios support any amount of inclusionary housing. Assuming the low end of costs, IH becomes viable in the strongest markets and potentially viable in moderate markets.

To assess the maximum potential for IH, we can use the low-end costs and assume a land acquisition cost of 10% of the total project. In the higher priced markets, the midrise scenario could support up to 16% IH and the high rise scenario has 11% available for IH. For the moderate and weaker markets, neither the high-rise nor midrise projects had sufficient RLV to satisfy a land acquisition cost of 10% of project cost.

The low-rise scenarios support IH using the low-end costs, with developments in the strongest markets potentially supporting 38% IH and the moderate markets supporting 10% IH.



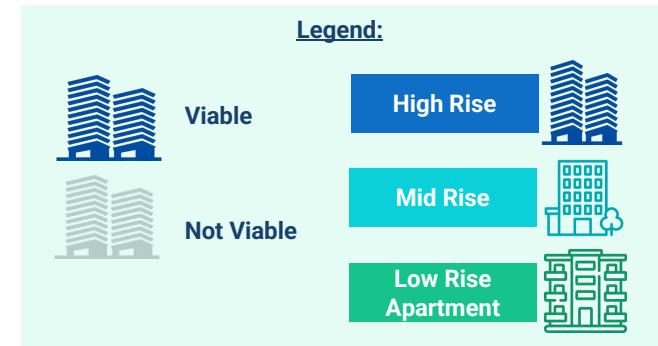
# Inclusionary housing opportunity – Future-looking Market Assumptions

## INCLUSIONARY HOUSING OPPORTUNITY

Housing market fundamentals are currently weak, with interest rates at the highest they have been in many years, and ongoing construction cost escalation that started during the COVID-19 pandemic. This figure illustrates how development viability improves if housing market fundamentals improve. This future-looking scenario assumes that in the next two years: interest rates decrease by 2% to bring construction loan interest rates to around 3% which are more in line with recent rates, and housing prices continue to rise following the 5-year trend for an increase of 11% over two years.

This analysis suggests that fairly minor improvements in the housing market will result in more projects becoming viable and subsequently more projects being able to support inclusionary housing contributions.

Of note is that in the lower price market area, few, if any, mid rise or high rise buildings are currently being built.

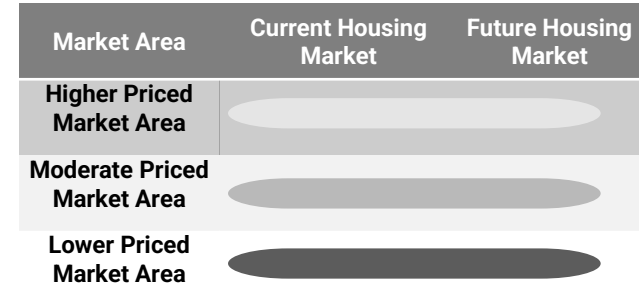


# Project viability sensitivity

## Market fundamentals

In this figure, the RLV results, based on the current housing fundamentals, are compared to a future-looking scenario where in the next two years interest rates decrease by 2%, so that construction loan interest rates are 3.1% and housing prices continue to rise following the 5-year trend - for an increase of 11% over two years.

The bars demonstrate the range of viability with respect to where the housing market could be in two years time (left end) and where the market is at today (right end - based on the lower-cost construction estimates). The results show that in all three market areas, some amount of inclusionary housing becomes viable as the market improves.



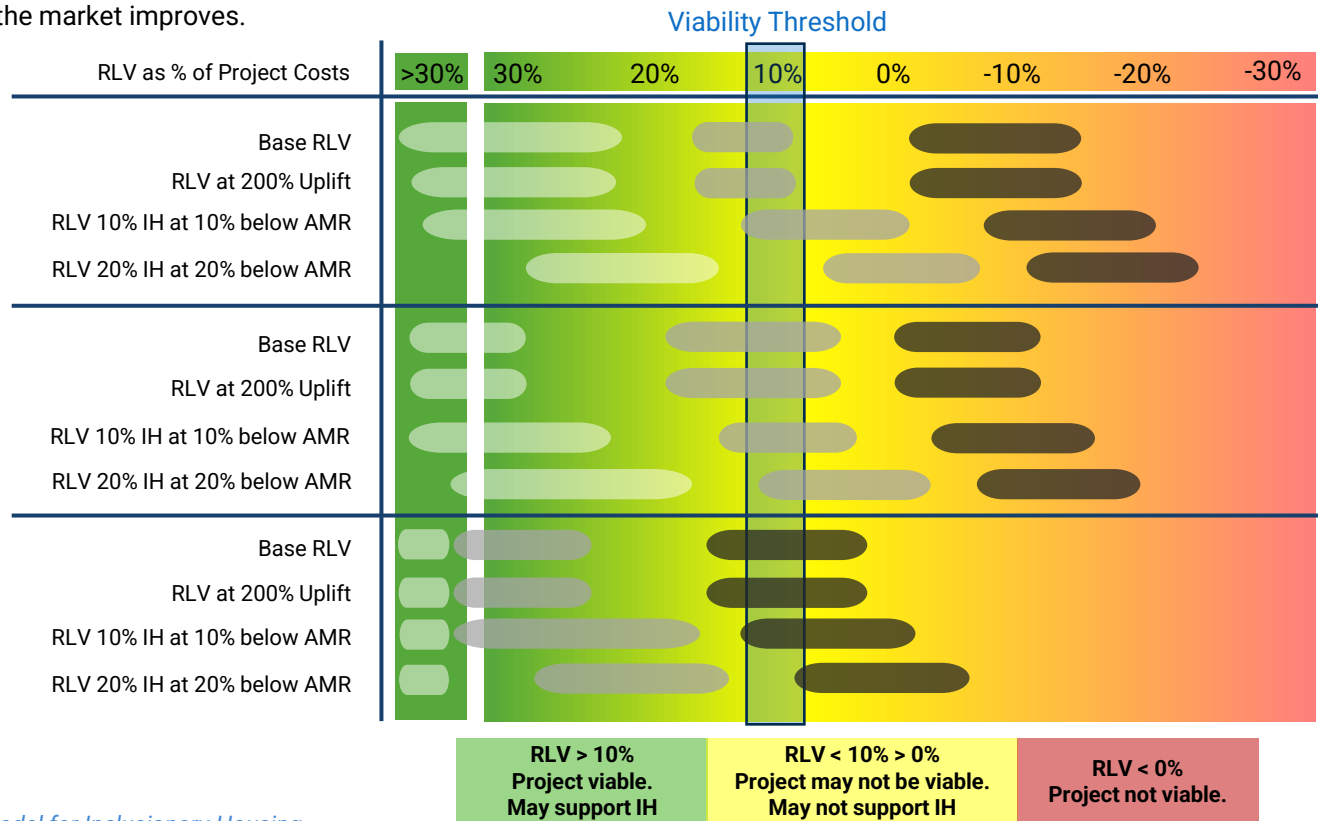
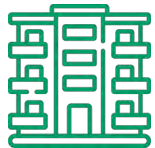
High Rise  
32 Storeys



Mid Rise  
10 Storeys



Low Rise  
Apartment  
6 Storeys



# Scenario viability results

## RLV ANALYSIS SUMMARY TAKEAWAY

The residual land value results on the previous page show the viability of new projects in the current housing market and a future-looking view of the housing market. The figure also shows the RLV in both markets of upzoning a site by 200% and the RLV impacts of two inclusionary housing policy options.

The two IH options shown are: a 10% set aside amount with the units rented at 10% below AMR, and a 20% set aside amount with rents at 20% below AMR.

Overall, in the current housing market, the higher priced markets appear to support inclusionary housing, the moderate markets may be able to support some IH, and the lowest priced markets appear to be challenged to find any viable projects given current costs and prices.

Looking forward to how the housing market will likely move, all of the scenarios for the higher priced market can support IH. The moderate priced market appears to be able to support approximately 10% IH in the near future, and the lower priced market can support IH in low rise apartment scenarios.

## RLV IMPACT OF UPZONING

The RLV results are nearly identical for the base case and the scenario where upzoning increased the density by 200%.

Upzoning creates additional value for already viable (profitable) projects, but not a significant increase in the *proportion* of profit. This means that the IH set aside percentage can not increase as more density is added. *More total IH units* can be achieved, but not proportionally more. i.e. If the project had a profit margin of 15% before an upzoning, the profit percentage will likely remain close to 15% in the upzoned project – in this example the total dollar amount would increase, but not the percentage.

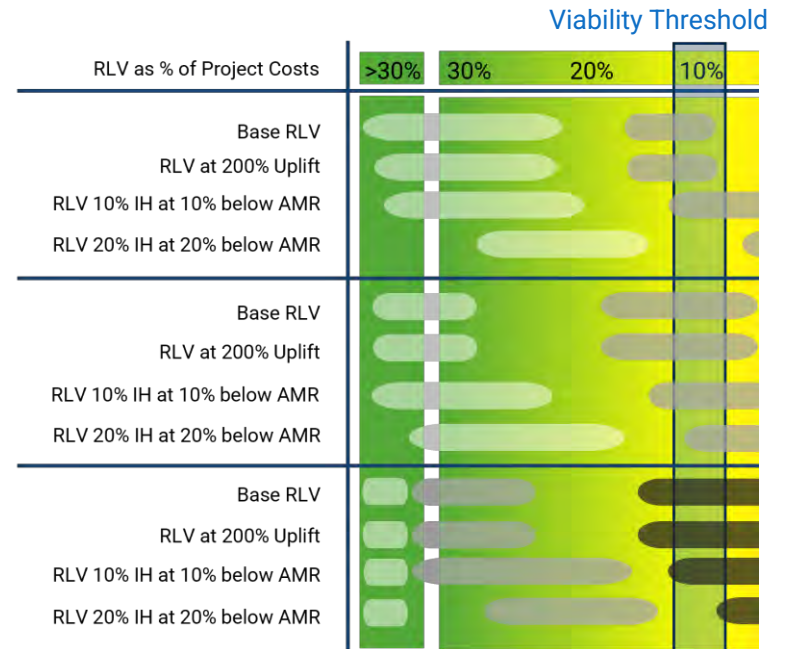
The same applies to the IH set aside amount. If the project can support 10% IH before upzoning, it should be able to support near 10% after upzoning, not a set aside amount of 15% or 20%.

HIGHER PRICED MARKETS

As shown by the project viability sensitivity, when using the lower end of the cost range with current cost assumptions, all of the scenarios had over 10% RLV, exceeding the viability threshold. The results for the forward-looking analysis suggests that all scenarios would support up to 20% inclusionary housing.

For the future-looking scenario, the high rise building would have challenges providing 20% IH at 20% below AMR, but would likely be able to support 20% IH at 10% below AMR.

The results for the midrise and low rise apartment buildings are similar. All of the future-looking scenarios have greater than 30% RLV, which provides enough revenue to support 10% land costs and 20% inclusionary housing.

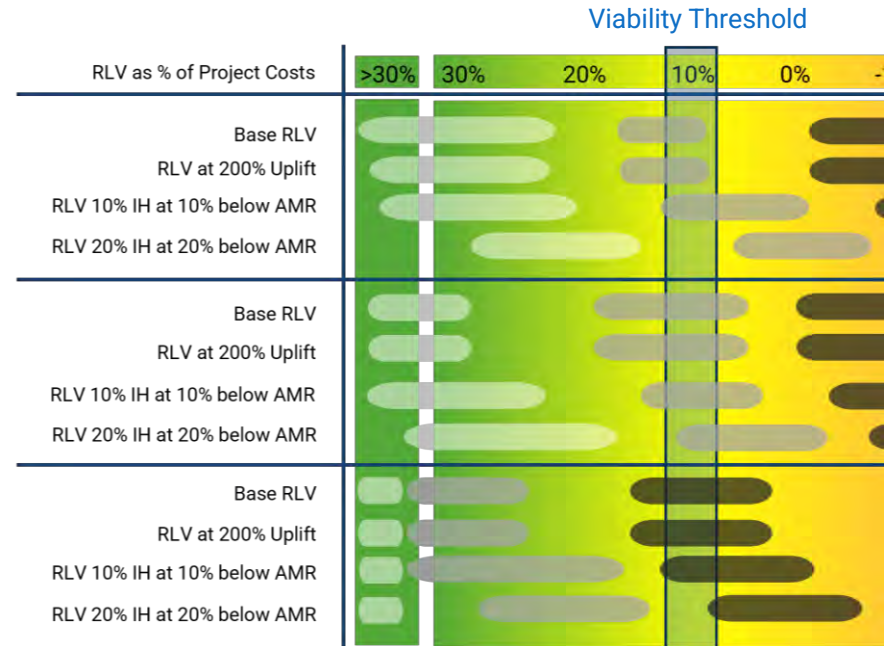


Market Area	Current Housing Market	Future Housing Market
Higher Priced Market Area		

**MODERATE PRICED MARKETS**

As shown by the project viability sensitivity, development in the future-looking moderate priced market scenario would support up to 20% IH in the low rise apartment scenarios and approximately 5% IH at 10% below AMR in the mid rise buildings.

The results for the high rise building suggest that an IH policy at 5% set aside and 10% below AMR may be viable, as the scenario has some RLV remaining after land is purchased.



Market Area	Current Housing Market	Future Housing Market
Moderate Priced Market Area	[Grey oval]	

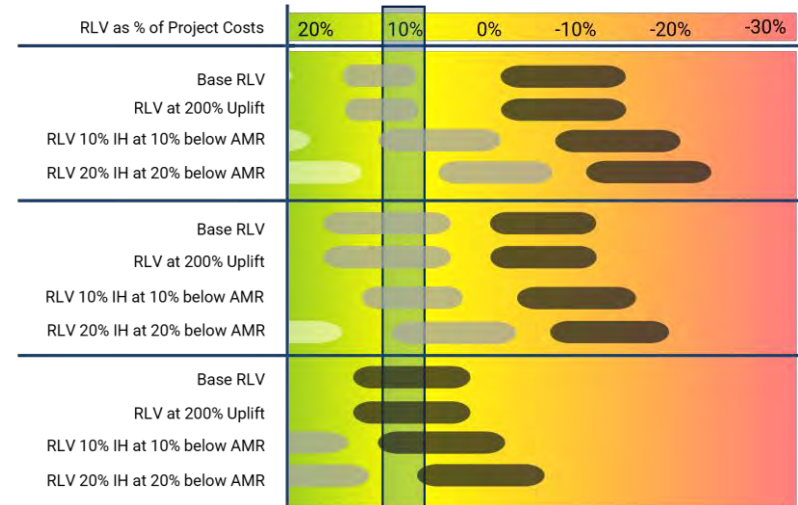
**LOWEST PRICED MARKETS**

As shown by the project viability sensitivity, for the future looking housing lowest price market scenarios, the low rise apartment is viable, and could support some amount of inclusionary housing (5%) at shallow affordability, such as 10% below AMR.

The fact that there is ongoing development in these communities suggests that the industry average costs and prices are not well aligned with the realities of development in these communities. This suggests that due to ongoing price elasticity (ability to continue to rise) these market may be able to support a moderate amount of inclusionary housing. For these communities, establishing an inclusionary housing policy while prices are rising will enable the community to capture some of this value and turn it into affordable housing for the future.



**Viability Threshold**



Market Area	Current Housing Market	Future Housing Market
<b>Lower Priced Market Area</b>	[Dark Oval]	



# Policy implications

This financial analysis is a point in time snapshot that can not completely capture the full range of housing market conditions across a region as large as Metro Vancouver. The results are indicative of the range of financial outcomes for a suite of scenarios based on today's market conditions.

To account for the current weakness of housing development fundamentals, a forward-looking analysis was conducted that anticipates interest rates coming down and housing purchase prices to continue to rise. The interest rates were assumed to be 2% below current rates and that house prices in across the region would increase by approximately 11%, based on the five year housing price trend.

The two policy features with the greatest impact on project feasibility are:

1. the affordable housing unit set-aside percentage i.e., the share of units in the building that are affordable; and
2. the depth of affordability requirements i.e., how affordable the affordable units must be.

## HOUSING MARKET DIFFERENCES

The analysis shows that each of the three housing markets have different development realities; any inclusionary housing policies need to enable individual communities to set their policy to align with their market conditions. The analysis suggests that the highest priced markets can support inclusionary housing immediately, as seen by the units being created by existing policies, and that more modest policies are needed in the lowest-priced markets to ensure that new developments will continue to be brought to market.

## CONCLUSIONS

The analysis, and alignment with the current policy direction across the region, suggests selecting a depth of affordability such as **10% below AMR**.

For the set aside percentage, the highest cost markets appear to support **10% inclusionary housing with some scenarios supporting 20% set aside**.

The analysis for the moderate and lower priced markets suggests that development will likely be able to support some IH in the near future (+2 years). Introducing a modest set aside amount of 5% to 10% would create some units and position the municipality to increase the inclusionary housing set aside amount as the housing market improves in the future.

# Analysis of not-for-profit ownership

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This section provides an analysis of Inclusionary Housing units being purchased and operated by a non-profit housing provider

# Not-for-profit ownership assumptions

## NOT-FOR-PROFIT OWNERSHIP

An alternative to the developer retaining ownership of the IH units and renting them at an affordable rent (thus taking in reduced annual revenue compared to a market unit) is for the units to be sold to a not-for-profit housing provider at a reduced purchase price, and the housing provider rents out the units. The cost to the developer for either scenario would be similar.

Selling the units at a reduced price to a not-for-profit housing provider facilitates retention of the units in the affordable market, administrative efficiencies, and may enable deeper rental affordability through rent supplements that the housing provider has access to. The model calculated the amount of a mortgage the housing provider could carry (when purchasing the IH units) with rents (mortgage payments) set at the Housing Income Limits (HILs).

The RLV impacts were found to be between the results for the 10% of the units to be offered at 10% below Average Market Rent (AMR) and the 20% set aside scenario. In the most expensive markets, the RLV impact is approximately 2.5% worse; in the least expensive housing markets in the region, the non-profit transfer of ownership option reduces the RLV by approximately 0.5%.

	Vancouver HILs 2023	Maximum Rent / Mortgage Payment	IH Unit Purchase Price
Bachelor	\$ 58,000	\$ 1,450	\$ 207,850
1 Bedroom	\$ 58,000	\$ 1,450	\$ 207,850
2 Bedroom	\$ 72,000	\$ 1,800	\$ 258,020
3 Bedroom	\$ 86,000	\$ 2,150	\$ 308,190
4+ Bedroom	\$ 107,500	\$ 2,688	\$ 385,230

## AFFORDABLE RENT

Using the HILs to establish the purchase price simplifies the IH policy across the region, however the maximum rents derived from the HILs are higher than AMR in some communities. This means that the housing provider would need to find additional revenue sources to fill the gap between the IH affordability target (10% below AMR) and the mortgage amount. Though there would be an operating deficit at first, as the mortgage is paid down, and rents slowly rise, the units would gradually generate positive revenue.

## RECOMMENDATION

The recommendation is for the inclusionary housing units to be purchased by a non-profit housing provider. Having these units available at a price that is lower than the market price balances providing an affordable housing benefit in exchange for the additional revenues the developer will realize with an upzoning, with moderating the financial impact to the developer while also moving these units permanently in the affordable housing stock.

# RLV impact of NFP purchasing IH units

		HIGHER PRICE MARKET AREA	MEDIUM PRICE MARKET AREA	LOWER PRICE MARKET AREA
HIGH RISE	Base RLV	11%	-10%	-26%
	NFP Ownership at 10% IH	5%	-15%	-30%
	RLV 10% at 10% below AMR	7%	-14%	-29%
	RLV 20% at 20% below AMR	2%	-19%	-34%
MIDRISE	Base RLV	15%	-7%	-24%
	NFP Ownership at 10% IH	9%	-11%	-27%
	RLV 10% at 10% below AMR	12%	-10%	-26%
	RLV 20% at 20% below AMR	6%	-15%	-31%
SMALL APARTMENT	Base RLV	26%	2%	-16%
	NFP Ownership at 10% IH	21%	-3%	-19%
	RLV 10% at 10% below AMR	23%	-2%	-19%
	RLV 20% at 20% below AMR	18%	-6%	-23%

**RLV > 10%**  
Project viable.  
May support IH

**RLV < 10% > 0%**  
Project may not be viable.  
Does not support IH

**RLV < 0%**  
Project not viable.

This chart shows the Residual Land Value (RLV) impact of a not-for-profit housing provider buying the IH units (and subsequently renting them at an affordable rate), compared to the base RLV of the scenario and scenarios where the developer retains the units and rents them at an affordable rate.

The key assumptions for this analysis include, using the high end of the construction cost range, that the units purchased by a not-for-profit housing provider are priced where the amount of mortgage that can be carried if the rents (revenue) are affordable to households earning the upper end of the Housing Income Limits (HILs).

The results suggest that the RLV impact to the development falls between renting 10% of the units at 10% below AMR and renting 20% of the units at 20% below AMR.

# 3 Recommended Regional Inclusionary Housing Model: Policy Components

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This section provides details on the recommended policy components and parameters to be included in the model inclusionary housing policy framework. It also touches on the recommended tiered policy structure.

# Introduction

## POLICY FEATURES

The following section describes the recommended tiered policy structure and discusses the eleven inclusionary housing policy components that comprise the framework, summarizing the research that has been conducted, and providing a recommendation for each component. Further details on the implementation of the tiered approach can be found in Section 4: Conclusions.

Additionally, each policy includes a discussion of potential implementation considerations and the potential roles for non-profit housing providers and Metro Vancouver in the implementation of each aspect of the policy.

As previously noted, this study was based on a point in time analysis of the overall regional context and representative markets. The policy component recommendations thus reflect the minimum policy requirements that could be implemented across the region. Going beyond the recommended framework is encouraged, however further analysis on a local level is recommended to support frameworks with deeper affordability and higher set aside rates.

## POLICY FLEXIBILITY

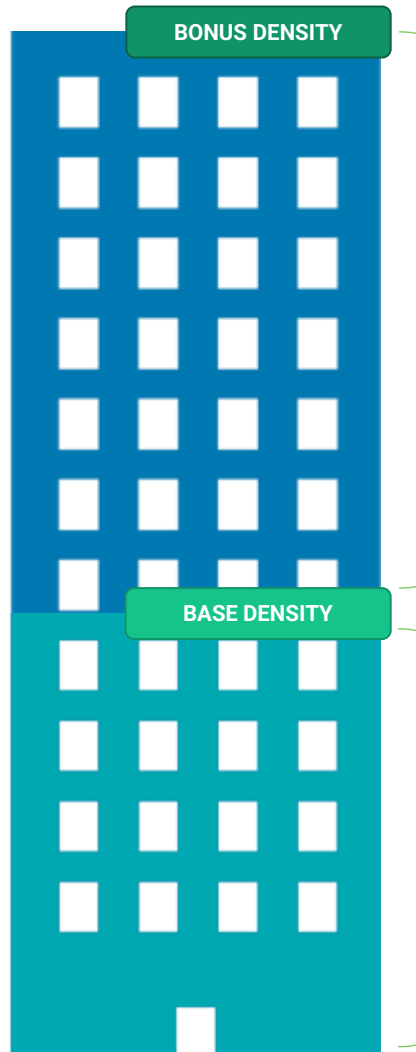
A key consideration for an inclusionary housing policy is whether it will be a very prescriptive policy or more flexible.

The recommendations generally align with the “more flexible” axis of inclusionary housing policy features. The depth of affordability is modest, there is flexibility in which organization owns and operates the units, there is a recommendation to enable opt-out through cash-in-lieu or off-site development, and the set aside amounts are suggested to begin at very modest amounts and increase as the housing market in the region improves.

Where the recommendations are less flexible are in the length of affordability, and that no incentives are being considered beyond the financial advantages of requesting an upzoning.

# Recommended policy framework

## A tiered approach



### *Inclusionary Housing*

**Tier 1: 5% set aside at 10% below AMR.** This tier has the lowest level of inclusionary housing set aside rates which will generate new affordable housing units and is recommended for regions with lower rates of high-density development.

OR

**Tier 2: 10% set aside at 10% below AMR.** An intermediate approach to inclusionary housing. This tier has a higher set aside rate than Tier 1 and is recommended for regions with moderate rates of development.

OR

**Tier 3: 20% set aside at 10% below AMR.** The highest level of inclusionary housing. This tier has the same set aside rate as Tier 2, but an increased depth of affordability. This tier is recommended for regions with high rates of development and the highest unit prices.

+

### *Inclusionary Zoning*

In **TOAs** where recent Provincial legislation has resulted in preemptive upzoning to enable as-of-right development permissions, municipalities could apply a mandatory set aside rate to the newly increased minimum base density, to ensure that a portion of the increased land value is captured for affordable housing.

This mandatory framework (**inclusionary zoning**) could adopt the same tiers as the voluntary framework (**inclusionary housing**) but would be applied to the base density and therefore would not require the negotiation of a density uplift to trigger its application.

This mandatory framework would require enabling legislation to permit inclusionary zoning by the Province. Inclusionary zoning is not currently permitted under the existing provincial legislation.

# Unit set aside

## TIERED SET ASIDE RECOMMENDATION

Voluntary Tier	Unit Set Aside
Tier 1	5%
Tier 2	10%
Tier 3	20%

Inclusionary housing policies establish a percentage of affordable housing units required in new market-rate development projects (i.e., unit set-aside rate).

Determining the “set-aside” percentage is a key decision for policymakers since it impacts the economics of development and ultimately affects the number of affordable housing units that will be generated. The unit set-aside rate impacts the feasibility of a project such that as the set-aside percentage increases, the average per-unit revenue potential of a development declines. In general, the revenue loss associated with increasing the set-aside percentage is greater for projects that can generate higher market-rate rents.

Residential development viability is at a recent low due to a rapid rise in construction costs during the pandemic, and increased interest rates driving down the amount of mortgage that purchasers can carry. Costs have increased by over 20% in the region between 2021 and 2023, and interest rates have risen from a Bank of Canada prime rate of 2.45% in 2021 to 7.2% today.

**The analysis suggests that where projects are currently viable, having a 10% set aside would be viable using the low-cost assumptions.** As the development environment in the region becomes healthier, a higher set aside amount can be viable.

The recommended set aside amounts are based on the financial analysis results for the low-end construction costs. This somewhat optimistic recommendation considers that current construction costs and mortgage costs are at recent highs and the longer-term prospects are for residential construction to return to higher profitability, and thus able to carry higher affordable housing contributions.



## TIER SELECTION CONSIDERATIONS

In the weakest markets, we anticipate profitable residential housing development to continue as has been seen in recent years.

Introducing a small IH set aside amount would lay the ground-work for administering an IH policy as the market improves.

The rapid rise in housing prices in the lower-priced communities in Metro Vancouver suggests that though the RLV analysis shows weak profitability, there still appears to be price elasticity remaining – this suggests that significant development is expected to occur in the near future and that an inclusionary housing contribution would be supportable with low risk to stalling the development environment.

Consistent and significant year over year price increases across the region suggests that there is price elasticity (ability for prices to rise); these price increases could go towards IH instead of additional profitability.

The low rental vacancy rate seen across the region also suggests that there is also pent-up demand for new ownership units that will continue to drive sales prices upward.

The difference between construction costs and sales prices, on a per-square-foot basis can be used to infer the potential profitability of development in a housing market. This analysis found that markets that had sales prices that were twice the cost of the hard-costs of the project (including parking) would support some inclusionary housing; each 0.1 multiple after that is approximately 10% more profit, which suggests that markets with prices at 2.1x hard-costs may be able to support higher proportions of IH of either Tier 2 or Tier 3, depending on the baseline Tier that is adopted.

### Recommended Unit Set Aside Amounts

Housing Market	Initial Tier	Future Tier
Lower Priced Market Area	Tier 1 5%	Tier 1 5%
Moderate Priced Market Areas	Tier 1 5%	Tier 2 10%
Highest Priced Market Area	Tier 2 10%	Tier 3 20%

For lower priced market areas, Tier 1 at 5% would be appropriate to ensure that development can proceed, while capturing some of the value generated as sales prices increase.

The moderate priced housing markets in the region may have less elasticity remaining in the market. This suggests that a conservative IH policy, such as Tier 1 at 5%, is appropriate to start with, with the goal of eventually reaching the Tier 2 set aside amount of 10%.

The analysis suggests that the highest price markets can support a set aside amount of 10% currently. The recommendation is to apply the Tier 2 set aside of 10% immediately and phase in the Tier 3 set aside amount of 20% over time.

#### IMPLEMENTATION CONSIDERATIONS

*Project with few units should be examined for off-site delivery or cash-in-lieu.*

*Scattered units (<5 per building) and larger blocks of units are both needed by different types of housing providers, depending on resident needs. However, in terms of operational efficiency and administrative costs to set up agreements and manage the units, larger blocks of units are preferred.*

#### ROLE OF NON-PROFITS

*With a recommendation for the IH units to be purchased and operated by non-profit housing providers, the role would be to participate in a process to select or pre-qualify housing providers for acquisition of new IH units.*

#### ROLE OF MVRD

*There is a role in the IH policy for selecting and approving non-profit affordable housing operators that would purchase and operate the IH units. The following organizations are well positioned to provide this function: Metro Vancouver Regional District (MVRD), Metro Vancouver Housing, BC Non-profit Housing Association (BCNPHA) or BC Housing.*

*There is a potential role for MVRD to provide a coordination function for establishing and operating a central waitlist for IH units with priority for local residents.*

# Phase-in of unit set aside

There are two options for phasing-in the inclusionary housing unit set aside amount. The literature review suggests that a three year phase-in is common, but because various implementations of inclusionary housing exist in the region a shorter two-year phase-in may be appropriate.

The development industry would be made aware of the potential for a new IH policy through the public engagement process before the by-law is brought to Council. Providing at least one year before the IH policy goes into effect allows in-progress projects to use their current financial assumptions.

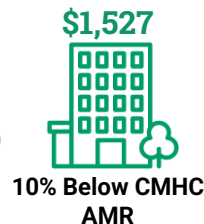
Projects that come forward more than a year after the passing of the IH by-law have had significant time to adjust to the new policy and its associated costs. However, they may already have a significant amount of locked-in costs from prior to the policy's approval or passage. A reduced IH set aside amount mitigates the policy impact on these projects. Providing two years of awareness of a new policy should be sufficient for almost all projects to adjust to the new requirements and to be able to bring forward viable projects.

The phase-in period is intended for when the by-law is initially introduced. Should a municipality opt to move between Tiers, the upper end of the Tier should be implemented when Council passes the by-law amendment. There should be at least a year between passing the by-law and the Tier change coming into effect, giving the development industry some time to adjust. This assumes that the municipality already has an IH policy in effect, and thus operates as if phasing in from Year 1 to Year 2 – i.e., an increase in the amount of affordable housing in an existing policy.

# Depth of Affordability

## AFFORDABILITY RECOMMENDATION

Voluntary Tier	IH Policy
Tier 1	10% below AMR
Tier 2	10% below AMR
Tier 3	10% below AMR



\*average market rents are for 1-bedroom units in Metro Vancouver.

The recommendation is for setting the depth of affordability at 10% below CMHC average market rent. This level of affordability differentiates the IH policy from delivery of deeply affordable (RGI) and supportive housing that require operational subsidies. With the IH policies being implemented by local municipalities, they are not the primary provider of deeply affordable housing, and this policy would allow them to continue to focus on below-market housing for low to moderate income earners. As seen the graphic above, 10% below CMHC AMR is notably lower than rents for newly constructed rental units, thus providing housing options for more moderate income levels.

The moderate and weaker markets had challenging RLV results; a modest affordability threshold allows for the housing industry to adjust to an IH policy with modest financial risk. Only the strongest markets can support both a 10% set-aside and rents at 20% below AMR.

In member jurisdictions that have policies that require deeper levels of affordability supported by a detailed financial analysis, it is recommended that the same affordability metric (i.e., X% below CMHC average market rent) be adopted in order to achieve policy alignment and consistency in metrics across the region.

## IMPLEMENTATION CONSIDERATIONS

The current financial analysis suggests that IH is only viable in the strongest markets, with the most optimistic construction cost assumptions.

The high-rise scenario can support 11% IH with units at 10% below AMR and 4% IH at 20% below AMR. There is a trade off between number of units (set aside) and depth of affordability.

Annual rent increases should be limited to the Provincial maximums for ongoing tenancies, and reset to the percentage below current AMR on unit turnover

## ROLE OF NON-PROFITS

Potentially there is a role for a not-for-profit agency, such as BC Housing, Metro Vancouver Housing or BC Non-profit Housing Association (BCNPHA), in monitoring and reporting of the agreements.

## ROLE OF MVRD

Potentially there is a role for MVRD in reporting on the number units created and the depth of affordability.

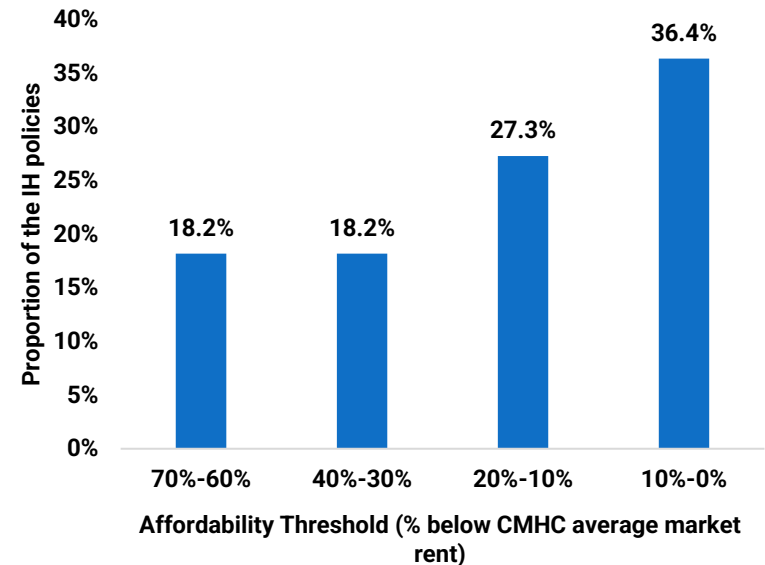
# Depth of Affordability Financial Implications

The depth of affordability requirements have implications on the feasibility of a project in the same way that the unit set-aside percentage does i.e., the average per-unit revenue of a development declines as the affordability requirement deepens.

There is a trade off between the unit set-aside rate and the depth of affordability threshold. Generally, the deeper the affordability level, the lower the percentage of affordable units required. Most of the inclusionary housing policies in Metro Vancouver currently are not providing deeply affordable units. More than 60% of the programs explored in the jurisdictional scan expect developers to set the price for affordable units at 20% below CMHC average market rent or less.

Municipalities have the option to serve households with lower-incomes through inclusionary housing so long as developers can trade targeting lower-income households in exchange for developing fewer affordable housing units. Municipalities can also increase the incentives to enhance the feasibility of deeply affordable housing units.

**Figure 4: Metro Vancouver Inclusionary Housing Policies - Affordability Threshold**



# Opt-out considerations

## CASH-IN-LIEU OR OFFSITE PROVISION RECCOMENDATION



### IMPLEMENTATION CONSIDERATIONS

*The decision to allow the IH units to be provided off-site should be the responsibility of Council, with justification support from staff. This is to improve transparency and ensure that the public is informed of what the benefits are and why this project is being treated differently. Justifications could include that the residents of the IH units would benefit from being in the alternative building due to the social services being offered in the building, the units being more affordable due to a non-IH mechanism, or where the units can be occupied significantly in advance of when they would otherwise be ready for occupancy.*

*Off-site development legal agreements will be lengthy and complex and should be registered on title to ensure if the land is sold the IH requirements remain. Both legal and development policy staff must be allocated to creating, managing and implementing these agreements.*

*Cash-in-lieu can be managed by either the municipality or the Region, though ensuring the funds get spent in the communities where it was raised is a highly desirable policy outcome. The amount of cash-in-lieu, when this option is used, should be sufficient to build an equivalent amount of units on another site. The dollar amount per unit or per GFA would need to be adjusted annually based on construction price trends in the municipality.*

### ROLE OF NON-PROFITS

*Off site units will likely be associated with planned affordable housing development; creating relationships with staff and the local development industry will facilitate accessing these opportunities for additional funding/development support.*

*Participate in creation of the off-site development agreement to ensure it integrates with their development objectives.*

### ROLE OF MVRD

*Providing advice to municipal staff on common or standard agreement clauses and implementation procedures.*

*Potentially managing the cash-in-lieu funding pool by collecting cash-in-lieu funds and administering to non-profit or municipal-led affordable housing projects.*

# Minimum size of development

This policy alternative exposes two interrelated issues that are found in the implementation of IH policies: protecting the financial viability of small projects and limiting the number of individual affordable units that are widely distributed throughout many developments. Linking the minimum development size to the number of additional units aims to align the magnitude of the IH requirement with the amount of additional density requested, avoiding large IH requirements for relatively small upzonings. Alternatively, the threshold can reference the total number of units in a development that has requested an upzoning; this will likely capture more projects and create more IH units.

Both a unit count threshold and unit area or size threshold are needed to avoid “gaming the system” by proposing developments that are just below the threshold. In 2022, the average strata unit size was 770 sq.ft. A number near this should be assumed for the average unit size when determining the area threshold.

## FINANCIAL IMPACTS & TRADE-OFFS

The larger the threshold, the fewer IH units that will be created. Smaller projects have less land value to off-set the IH financial impact, which may make smaller projects less viable for a longer period of time while land prices adjust.

The cost of creating and managing IH agreements will be similar, regardless of the project size; however, the administration cost per unit goes up as the projects get smaller. Therefore, smaller projects will be relatively more expensive for the municipality to acquire and manage.

It is more expensive to operate and maintain a scattered portfolio, rather than larger blocks of units, as the economies of scale for the housing operator decrease with smaller projects.

## MINIMUM DEVELOPMENT SIZE RECOMMENDATION

Upzoning That Results in Developments With ...



Total Project Size Policy:  
100 total units, or 80,000 sq. ft.

## BEST PRACTICES

*Generally, inclusionary housing policies generate the most below-market units in areas where the most market rate development is occurring. These areas are often identified as ‘strong’ markets, compared to ‘medium’, or ‘weak’ markets.*

*Inclusionary housing policies have various threshold sizes across Canada, depending on geography and market strength. Typically, threshold size varies from a minimum of 10 units to over 200 units. In Toronto, developments with fewer than 100 units are exempt from the Inclusionary Zoning By-law.*

## WHAT WE HEARD

*Participants consulted throughout the project indicated that inclusionary housing works better in high density zones. When density offset rules were the same for all sites, larger sites benefited.*

*Developers indicated a preference for flexible rules that responded to present conditions, such as lessening the affordability requirements for concrete builds typically on smaller sites.*

# Requirements based on tenure

The three primary types of development are strata, purpose built rental and free-hold. Free-hold is primarily low-density development and rarely targeted for IH policies.

Purpose built rental development is currently financially challenging across Canada. Inclusionary housing units depress project revenues relative to market-rate units. In the current development climate, our economic analyses indicate that the forgone profits from inclusionary housing units are sufficient for purpose-built rental developers to cease development, making purpose-built rental inclusionary housing policies untenable, except in the strongest markets in the region.

Strata developments are the most common high-density development, with the highest potential profits and the greatest ability to contribute toward community benefits such as affordable housing. The higher market-rate profits in strata buildings increases the capacity to forgo maximal profits on inclusionary housing units, making strata developments a preferable focus for inclusionary housing policies.

## FINANCIAL IMPACTS & TRADE-OFFS

Excluding other development types reduces the potential pool of projects that could contribute IH units.

Adding additional financial burden to purpose built rental projects conflicts with the general need for increasing the stock of rental, at any price point.

Large free-hold subdivisions (to meet the minimum project size) are some of the most profitable developments, but also require a significant amount of public infrastructure (roads, water, etc.) during development.

## BASE TENURE RECOMMENDATION

### Base Tenure



Strata developments

## BEST PRACTICES

*Generally, the base tenure affects the depth of affordability and the project viability. The goals of the program should influence whether rental or strata development is pursued.*

*Port Moody and Richmond both adopted strata-only inclusionary housing policies.*

## WHAT WE HEARD

*Currently, the equity required to build rental buildings is prohibitive and administration of this tenure-type poses significant challenges. Purpose-built rental construction has only been possible because of the Rental Construction Financing Initiative. However, the program has become too onerous, and developers are no longer applying to the program.*

*In the current economic climate, strata buildings are more feasible, however both renter and ownership should be considered when drafting a by-law. Recent changes to the Strata Title Act have complicated matters.*



# Unit type and size

Affordable unit type and size allocation can be based on a variety of factors. Constructing larger units introduces more affordable options for families and households of a larger size. In an Inclusionary Housing policy based on Gross Floor Area, another approach is allocating smaller unit sizes. This allows for a greater overall number of affordable units to be introduced. The allocation of unit type and size can also be calculated based on current or projected housing need.

Construction is simplest, however, if the affordable unit mix matches the market units, with no unit size or type customizations. An additional consideration is having the Inclusionary Housing units in a contiguous block – either horizontally or vertically – makes the ongoing land titles and title management easier.

## FINANCIAL IMPACTS & TRADE-OFFS

Assuming that the amount of IH contribution (set-aside amount) is calculated as a proportion of GFA, the developer should not have a strong preference on whether the affordable units are smaller (1-bedroom) or larger (2+ bedroom) units. (If there is an 8,000 sq.ft. IH contribution, there should be low financial difference between providing eight 1,000 sq.ft. units or ten 800 sq.ft. units.)

Requiring specific unit design for the IH units, that does not align with the proposed building footprint, adds significant additional design and construction cost to the project. These costs greatly increase the later in the project they are introduced.

## UNIT TYPE AND SIZE RECOMMENDATION

- Proportional to the mix of units and sizes of the market units.
- Customized to fit the operational needs of the affordable housing provider

### BEST PRACTICES

*Best practice is for the policy to have clear default direction on what the expectations are on unit size and mix for the affordable housing units. This is improved with the ability for the municipality, with participation of a housing provider, to be able to select which units become IH units, to improve the housing outcomes without requiring customization of the building footprint to meet the needs of the housing provider.*

### WHAT WE HEARD

*Due to BC Housing income limits, not-for-profits are reducing unit size to increase the number of units. There is a need for family housing with more bedrooms. Newcomers and Indigenous families have a need for larger-size, affordable housing.*

# Affordability period

## AFFORDABILITY PERIOD RECOMMENDATION

Length of Affordability for Units Created:



Life of the Building

### IMPLEMENTATION CONSIDERATIONS

*The agreement should ensure that premature redevelopment is discouraged to exit/avoid the affordability requirements.*

*Include an option for the municipality to exit the agreement if the strata corporation becomes financially distressed and large one-time fees are expected to be assessed.*

*There are administrative costs associated with longer term agreements, for example, agreements in perpetuity.*

*There needs to be a mechanism in the agreement for transfer of ownership or operation of the units between organizations, as the building may outlive the organizations that initially operate the units.*

### ROLE OF NON-PROFITS

*Creation of a tenant management plan as the building approaches its end of life.*

*Creation of a succession plan, if the organization will not be able to continue to operate the units.*

*They could potentially be the owner of the unit, enabling the value created to last beyond the life of the building/unit if they are eventually sold and the revenues reinvested in new units.*

### ROLE OF MVRD

*None specifically for this aspect of the policy.*

# Incentives

## DEVELOPER INCENTIVES RECOMMENDATION

Negotiated density bonus for inclusionary housing provision.

### RECOMMENDATION CONSIDERATIONS

*A voluntary policy framework, such as the proposed three tiers, where inclusionary housing is requested in exchange for additional density through upzoning is a form of density bonusing. This is unchanged from the current regulatory framework.*

*The potential mandatory tier aims to create a policy that will create affordable housing within the Provincially upzoned transit-oriented areas. As a mandatory policy, there are no incentives; however, tying these policy pieces together operates similarly to a density bonus initiative.*

### IMPLEMENTATION CONSIDERATIONS

*Metro Vancouver highlighted concerns about the extent of positive impact from a fast-track approval process relative to its administrative burden.*

*Numerous engagement participants indicated the importance of flexibility in an inclusionary housing policy, emphasizing that any policy framework or incentive should be responsive to market conditions, developer resources, building type/tenure, and changing legislation.*

*Metro Vancouver echoed this direction, and as a result is exploring a voluntary approach where density increases are negotiated on a project-by-project basis.*

# Ownership and operations/management

## OWNERSHIP & OPERATIONS/MANAGEMENT RECOMMENDATION

**The recommendation for unit ownership, operations, and tenant selection is to have a policy that allows for qualified organizations to perform any of the functions.**

**Additionally, the recommendation is to include an option for units to be sold below market rate to non-profit organizations for ongoing ownership, management, and operations.**

A flexible policy adds some additional work when creating the affordable housing agreement but has the highest potential to deliver improved affordability outcomes while continuing to ensure the developer is in control of their project financial outcomes.

The financial analysis found that selling the units to a non-profit housing provider at a price that can be serviced by a household with an income near the Housing Income Limits (HILs) has a RLV impact that is slightly higher than renting 10% of the units at 10% below AMR, but not as much of an impact as having the set aside amount at 20%.

### IMPLEMENTATION CONSIDERATIONS

*An option where the developer builds the units and sells at a price that a non-profit could afford based on affordable rents servicing a mortgage would ensure that the units become part of the stock of permanently affordable units. The financial impacts of this unit ownership model on project viability must be performed separately.*

*The implementation agreement must clearly identify the owner of the units and conditions where ownership can be transferred. There must also be clear identification of which organization is responsible for selecting tenants and verifying they are eligible to tenant the unit. The agreements also need guidelines on how unit management/operations are achieved and the amount of oversight the municipality has on unit management outcomes and selection of service providers.*

*As discussed in the discussion on the Set Aside amount, there is an opportunity for an organization such as MVRD, MVH, BCNPHA or BC Housing to provide region-wide vetting of housing providers. This could also include management of a centralized waitlist for residents that are eligible for IH units.*

### ROLE OF NON-PROFITS

*There is an opportunity for non-profits to be able to increase the depth of affordability, perform tenanting of units, management of units, and annual reporting on the units under their control.*

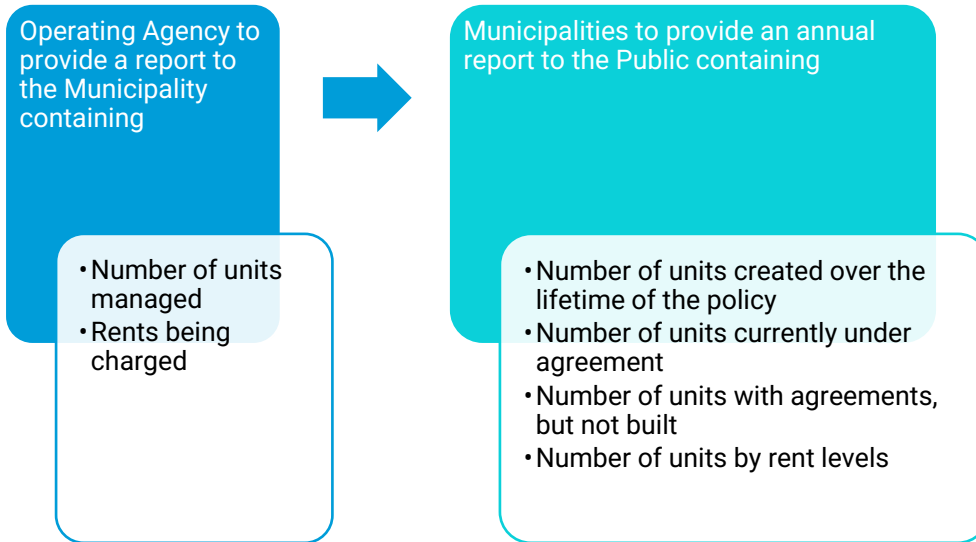
### ROLE OF MVRD

*MVRD, BC Housing, or MVH can participate by increase depth of affordability through rent supplements, manage tenanting of units, or providing administrative support when units change ownership of unit management companies.*

# Reporting requirements

## REPORTING REQUIREMENTS RECOMMENDATION

### Reporting Should Occur Annually



## IMPLEMENTATION CONSIDERATIONS

*Ensuring there is sufficient staff time allocated to management of the IH policies, including annual reporting is crucial.*

*The reports should be publicly available to ensure transparency.*

## ROLE OF NON-PROFITS

*Annual reporting to the municipality.*

## ROLE OF MVRD

*Annual reporting on the results of the model inclusionary housing policy.*

# Monitoring and evaluation

An inclusionary housing policy affects the local land markets and may affect the profitability and viability of new market housing. The expectation based on results from other jurisdictions that have implemented similar policies is that most of the impact will be absorbed in the land prices – this needs to be verified that it is occurring in the municipality.

IH policy creates long-term agreements that must be maintained. There should be periodic review of the ongoing costs to manage the program in relationship to the policy's costs and alternative affordable housing programs.

There needs to be a balance between predictability in the policy and adaptability to market changes. A 5-year review cadence is similar to the development timeframe for major residential developments, which suggests the affected organizations have a strategic horizon that a 5-year review period aligns with.

## FINANCIAL IMPACTS & TRADE-OFFS

A more frequent monitoring and evaluation period would allow for faster reaction to market conditions but has higher administrative costs and increases policy uncertainty for the development community, increasing their perceived costs.

The affordability outcomes of the policy should be compared to other types of affordable housing policies to ensure that this policy continues to be a good value option for regional municipalities.

## MONITORING AND EVALUATION RECOMMENDATION

- *Regular review of market assumptions*
- *Regular review of policy outcomes*
- *Regular review of the policy variables in meeting evolving housing needs*
  - *Review whether to move between Tiers by a municipality*
  - *MVRD to review and adjust the Tier definitions*
- *5-year reviews*

## BEST PRACTICES

*A common shortcoming of government policies is the rigour of the monitoring and evaluation process. Best practice is to include a requirement for monitoring and evaluation in the by-laws that create the inclusionary housing policy framework.*

*An inclusionary housing redirects a significant amount capital funding to affordable housing and has a very visible impact to new development; comparing the effectiveness of this policy to other types of affordable housing policies is needed to ensure transparency and to build community support for the ongoing operation of the policy.*

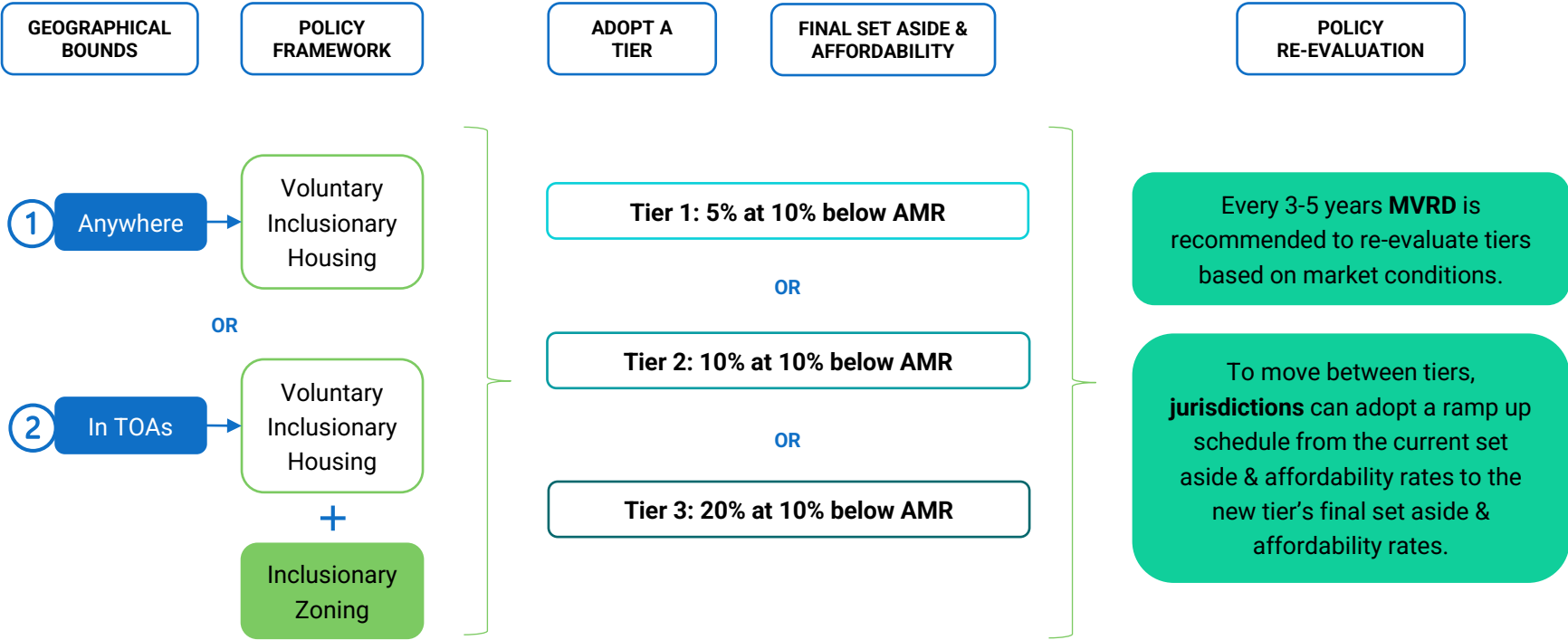
# 4 Conclusions

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This final section provides a summary of the implementation parameters for the regional model inclusionary housing and inclusionary zoning framework. It also touches on affordable housing opportunities through inclusionary zoning.

# Implementation

## A tiered approach



**\*Note:** in TOAs that adopt inclusionary zoning (with enabling legislation from the Province) the provision of IZ units are mandatory regardless of density uplift. If developments request a density uplift, the voluntary inclusionary housing and inclusionary zoning frameworks are suggested to be synchronized so that the frameworks may operate as one singular framework to be applied to the entire development.

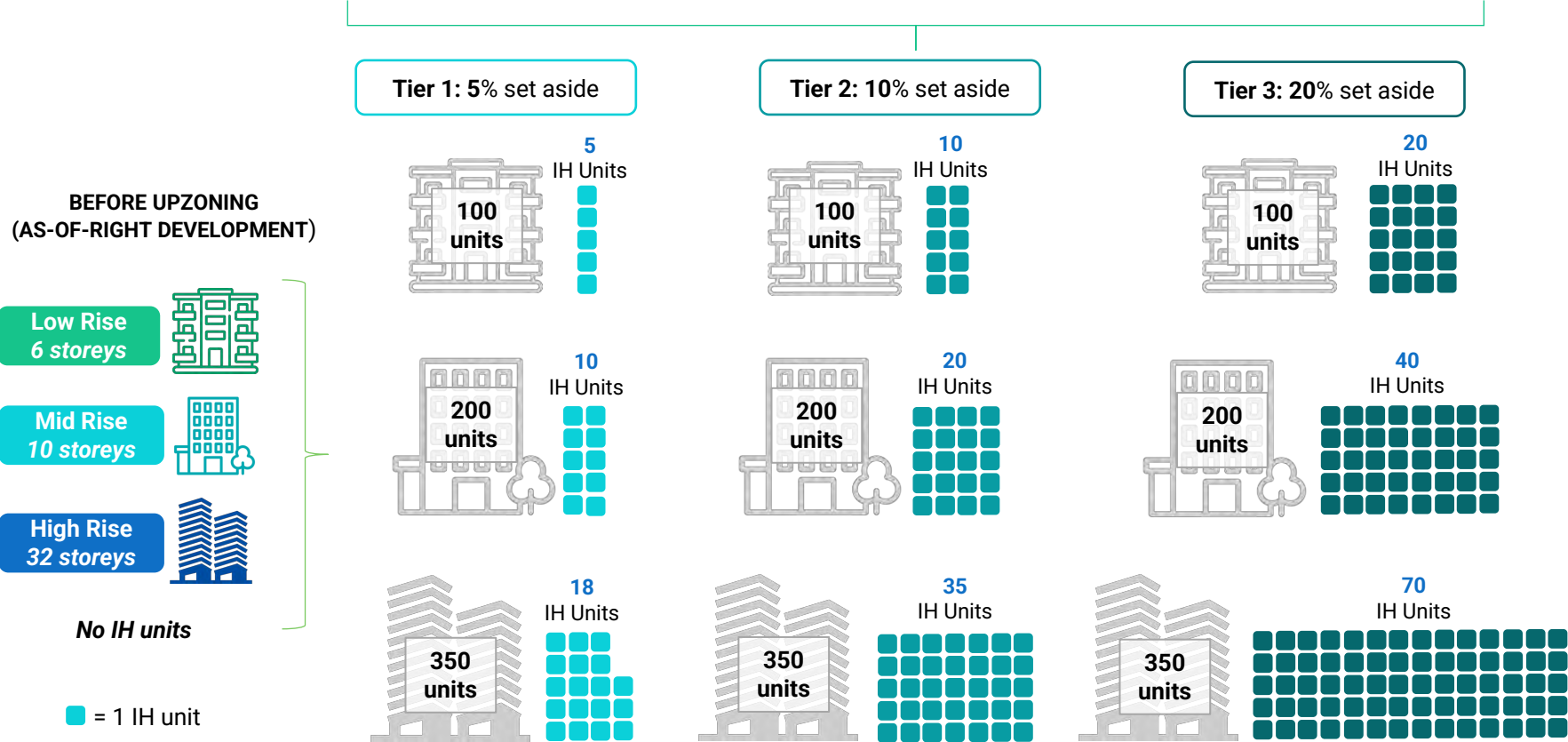
Anywhere else, the inclusionary housing framework applies to the entire building, and is triggered by an upzoning (increase of density) application. At the time of writing this report, the Province has not passed enabling legislation for inclusionary zoning, meaning that only the inclusionary housing component of this framework may be enacted.



# Sample IH implementation

The requirement to provide inclusionary housing units is triggered by an upzoning (increase of density). The following scenarios are for illustrative purposes to demonstrate how many units could be achieved through the application of the recommended inclusionary housing tiers, and are based on a 200% density uplift from as-of-right zoning, as considered in the prototypical development scenarios analyzed in this report.

## AFTER 200% DENSITY UPLIFT



# Sample IZ implementation

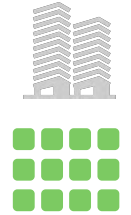
## High rise scenario

Upon enabling Provincial legislation, inclusionary zoning frameworks could apply to the base density of developments in TOAs. The following scenario illustrates how this inclusionary zoning framework will operate in tandem with an inclusionary housing framework.

The scenario uses a high-rise building in a TOA that is in a jurisdiction that has adopted Tier 2 (10% set aside rate) of the Inclusionary Housing framework and has requested a 200% density uplift from the as-of-right zoning.

In this scenario, the development size would increase from approximately 120 units to 350 units. Developments constructing to the as-of-right zoning will be required to provide 12 inclusionary zoning units. With the 200% density uplift, the requirement increases to a total of 35 inclusionary zoning/inclusionary housing units across the entire development. A similar principle and process would apply to any development in a TOA.

**BEFORE UPZONING  
(AS-OF-RIGHT DEVELOPMENT)**



12 IZ Units

### AFTER 200% DENSITY UPLIFT



12 IZ Units    23 IH Units

35 IH/IZ units

# Operational components

## Overview of recommended policy components

The operational components provide considerations for the size and tenure at which developments should be subject to IH and IZ frameworks, potential incentives for these developments along with regulations for opt-out provisions, and recommendations for the ownership and operational management of IH and IZ units.

### 1 MINIMUM SIZE OF DEVELOPMENT

Developments that are at least:



Total Project Size of 100 total units, or 80,000 sq. ft.

### 2 REQUIREMENTS BASED ON TENURE

Base Tenure:



Strata developments

### 3 OPT-OUT



### 4 INCENTIVES

Density Bonusing

To capture some of the value of increased density, inclusionary housing would apply where density increases are requested, and inclusionary zoning could apply where land has been already upzoned in a TOA.

### 5 OWNERSHIP & OPERATIONS/MANAGEMENT

The recommendation for unit ownership, operations, and tenant selection is to have a policy that allows for qualified organizations (for example, non-profit housing operators that are approved by the municipality to operate affordable housing units) to perform any of the functions.

Additionally, the recommendation is to include a provision for **units to be sold below market rate to non-profit organizations for ongoing ownership, management, and operations.**

# Affordability components

## Overview of recommended policy components

The affordability components provide considerations for the number, depth of affordability, period of affordability, size, and type of IH and IZ units.

### 1 SET ASIDE RATE

Voluntary Tier	Unit Set Aside
Tier 1	5%
Tier 2	10%
Tier 3	20%

### 2 DEPTH OF AFFORDABILITY

Voluntary Tier	Depth of Affordability
Tier 1	10% below AMR
Tier 2	10% below AMR
Tier 3	10% below AMR

### 3 PERIOD OF AFFORDABILITY

Length of Affordability for Units Created:



Life of the Building

### 4 SIZE AND TYPE OF UNITS

The inclusionary housing and inclusionary zoning frameworks are recommended to have unit types and sizes in a **proportional** mix to that of the market units and sizes.

Based on community feedback, it is recommended that this policy provision be customized to fit the operational needs of the affordable housing provider.

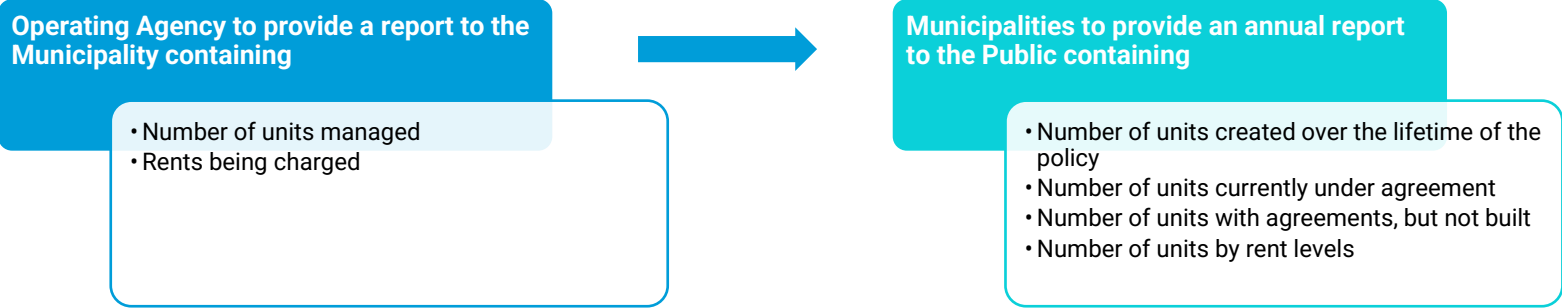
# Oversight and review components

## Overview of recommended policy components

The oversight and review components provide considerations for the ongoing management of the IH and IZ policy and the affordable units created under its framework.

### 1 Reporting Requirements

Reporting should occur annually:



### 2 Monitoring and Evaluation

Monitoring and evaluation requirements would involve a regular review of market assumptions, policy outcomes, and policy variables in order to meet evolving housing needs.

As a part of this process, MVRD would perform reviews to adjust the Tier definitions while individual municipalities would review whether to move between Tiers. It is recommended for there to be a **5-year review process**.

# Conclusions

This study puts forward an inclusionary housing model framework that would support Metro Vancouver and the communities within it to reach its objectives for improved affordable housing options moving forward, including the Metro 2050 regional target that 15% of all new units near transit be affordable rental housing units.

The goals of the recommended inclusionary housing model framework are to 1) provide a consistent framework of policies that member jurisdictions, whether they have pre-existing inclusionary housing policies or not, can voluntarily adopt or “opt-in” to, and 2) to support municipalities to implement the tool in the most effective way.

A region-wide framework for inclusionary housing will increase the effectiveness of existing IH policies in member jurisdictions by providing an opportunity to streamline requirements and create a consistent approach across the region, which will help developers and residents better understand the requirements for inclusionary housing and create opportunities to scale up delivery of IH in the region.

With the recent changes to provincial legislation, member jurisdictions are required to provide housing needs reports that estimate housing needs for 20 years. Concurrently, BC has adopted a pro-active planning system by requiring 20 years of pre-zoning to ensure that housing needs are met.

This study will be presented to the Province to support the introduction of enabling legislation for inclusionary zoning, to allow member jurisdictions within Metro Vancouver to require inclusionary units be provided as part of as-of-right zoning requirements.

This legislative change will allow communities to leverage the regional model of inclusionary housing to implement inclusionary zoning that capture the additional value created by moving to a pro-active planning system in BC that will rely more heavily on pre-zoning.

As a result of these initiatives and upon Provincial adoption of inclusionary zoning legislation, Metro Vancouver will promote a comprehensive, region-wide, and consistent inclusionary housing and inclusionary zoning framework that will encourage and enable member jurisdictions to meet the various housing targets as part of a forward-looking planning regime.

