

# Developing a Framework for Evaluating B.C.'s 30-Point Plan

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# Introduction

## Research Purpose

British Columbia is in the midst of a housing crisis. The provincial NDP government, having ran on a platform advocating for greater housing affordability and fairness, launched its comprehensive housing plan in 2018: “Homes for B.C. — A 30-point plan for housing affordability in British Columbia” (henceforth referred to as the 30-Point Plan in this report). The plan outlines 30 points for addressing the housing crisis with tools, policies, multi-agency partnerships, and other approaches to be implemented over the following decade.

Now that a year has transpired since the launch of the plan, it is appropriate to determine whether the 30-Point Plan is on-track. Furthermore, because the entire plan comprises myriad approaches with many partners and government bodies, it would be useful to have a single document that summarizes each point and how it is being actioned. As such, the British Columbia Non-Profit Housing Association (BCNPHA) has collaborated with UBC SCARP’s Affordable Housing Policy and Planning course to develop a research project based on evaluating progress of the 30-Point Plan.

Two groups attached to this project will respectively develop a broad evaluation of the plan and dive deeper into evaluation of a few points. Our group, responsible for the former task, developed several deliverables. These deliverables include a methodological framework for evaluation, findings and constructive critiques for each point, and a report card that will allow the BCNPHA to reference the status of each point and determine how to follow-up on progress.

## Anticipated Benefits for B.C. Non-Profit Housing Association

As BCNPHA is the provincial umbrella organization for the non-profit housing sector, it is important that they have access to an evaluation framework to use and share with their partners and staff. Currently, there is no all-encompassing document or site that consolidates and explains all actions for each point of the 30-Point Plan. The Plan conveys a breadth of approaches, with diverse strategies and methodologies, that are not immediately clear to any single reader.

By implementing and refining a framework to summarize and understand the 30-Point Plan, we hope to demonstrate the viability of this framework. Our findings on each point will update stakeholders on the 30-Point Plan’s progress. This summary is also available as a succinct report card that can quickly inform readers on the current status of the 30-Point Plan. These deliverables provide BCNPHA staff with a heuristic assessment of each point and its metrics, permitting easy reference on the implementation progress of the plan. Finally, we hope that we have refined the framework and report infrastructure so as to be conducive for future research updates as the plan implementation continues and new data is released.

# Introduction

## Introduction to The 30- Point Plan

According to the BCNPHA’s research outline: “The B.C. Government’s 30-point plan sets ambitious goals, aiming to address issues affecting homelessness, rental, and ownership components of the housing continuum. Policy measures included in the plan range from addressing tax fraud and evasion; creating new funding programs for affordable and non-profit rental housing; as well as expanding the power of municipalities to provide them with new tools to tackle the crisis.”

These various policies, programs, and legislative actions and split into five categories:



Stabilizing the market focuses on calming an unaffordable housing market primarily through taxation tools. These actions include increasing and expanding the foreign buyers tax, targeting upscale property transfers for more progressive taxation, and taxing short-term rentals like AirBNB.

Cracking down on tax fraud and closing loopholes focuses on addressing tax evasion and laundering. These actions include closing tax-loopholes on the ALR, maintaining registries to fight hidden homeownership, and coordinating with the federal government to clamp down on the laundering that inflates BC’s housing market.

Building homes people need is about the supply-side of housing: and the 6.6 billion dollar B.C. Housing fund that will help develop and maintain affordable housing projects for a variety of demographics, in partnership with non-profit service providers, municipalities, and other agencies.

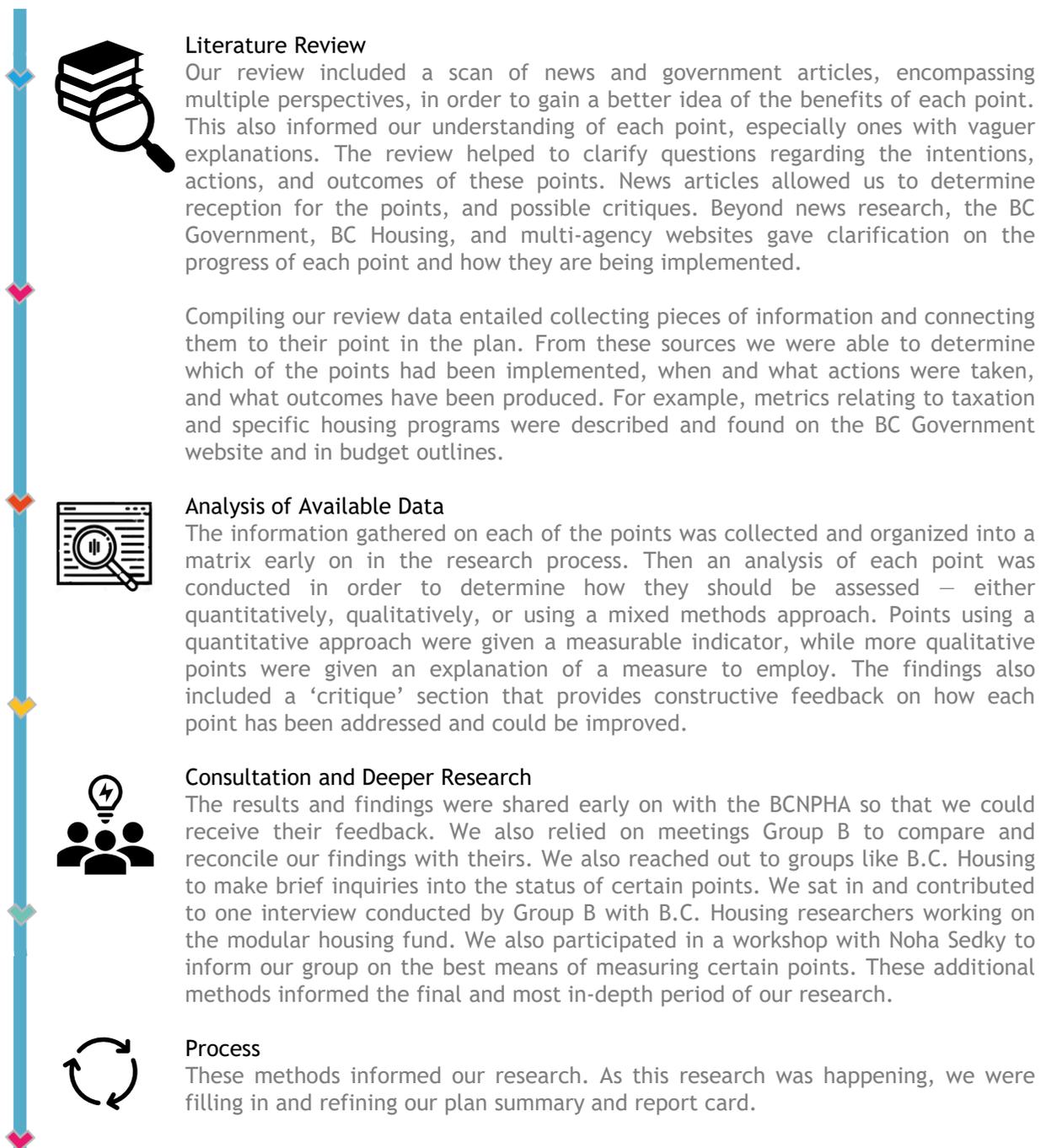
Security for renters is about ensuring that long-term assistance is available for renters. This entails expanding seniors benefits, strengthening tenant laws, and implementing an annual grant for renters.

Supporting partners to build and preserve affordable housing is about developing communicative infrastructure and establishing organizational partners at multi-agency levels. This includes the launch of the B.C. Housing Hub and providing local governments with greater jurisdictional power.

# Research Methodology + Process

A number of methods were used in order to develop our findings and framework for evaluating the 30-Point Plan. These included a literature review of relevant media and government documents, an analysis of each point to determine how they should be assessed, and consultation with other groups and informed individuals to further our understanding of each point.

Each method has been detailed as follows:



# Research Findings

What follows is our summary of the 30-Point Plan based on the evaluation framework below. The 30-Point Plan is divided into five sections. The findings in this report have been organized in the same order as the 30-Point Plan. Pages 7 through 35 present the report findings for each of the 30 points in detail.

Each of the thirty points were individually evaluated based on a consistent set of criteria which included:

- **Objective:** summary of the point's intended effect, impact, or benefit.
- **Approach:** who/where/what is targeted or changed in order to achieve the objective.
- **Progress:** whether or not the point has been implemented.
- **Method and Indicator:** The recommended quantitative, qualitative, or mixed method(s) and indicator(s) suggested for the evaluation of the point.
- **Critique:** Section of the report that provides additional input on the points (both personal insight from the group members, and insight gained from media scan) on whether the point was well-liked, constructed in an effective manner, or too unclear/vague to assess.

These were all summarized and pulled into a matrix, which we have identified as the 'report card.' The intention of this report card is to create a simplified sheet that will let the BCNPHA know what work has been done, and what indicator to use to track the point's status and effectiveness over time. The report card is presented on page 36 at the end of the Research Findings section of this report.



## STABILIZING THE MARKET

1. Taxing speculators who are driving up housing costs
2. Increasing the foreign buyers tax rate to 20%
3. Expanding the foreign buyers tax to areas outside of Metro Vancouver
4. Increasing the property transfer tax on the value of homes over \$3 million
5. Increasing the school tax rate on the value of homes over \$3 million
6. Allowing online accommodation providers to apply PST and MRDT on short-term rentals
7. Reviewing the Homeowner Grant to provide fairness for renters



# STABILIZING THE MARKET

## 1 Tax speculators who are driving up housing costs

**Objective:** This point targets foreign and domestic speculators who own residential property in B.C. but do not pay tax here. It seeks to turn empty homes into good housing for people and raise revenue that would directly support affordable housing.

**Approach:** All residential property in the designated taxable regions of B.C. must complete an annual declaration form on the vacancy status of their property. This change will be made through the B.C. Speculation and Vacancy Tax.

Progress: It has already been implemented.

### Method

Quantitative

### Indicator(s)

Change (%) in the proportion of property vacancies

First, track the # of homes registered under the annual declaration, which will signify the number of properties sitting empty. Then, determine if there has been a reduction in the proportion (%) of property vacancies. Compare annually to track the annual change in the number of homes eligible for the tax.

**Critique:** This point has been criticized for being more of a ‘vacancy’ tax than a ‘speculation tax,’ thus failing to address the actual issue. It is costly and timely as it requires all residents in the taxable regions to declare, while most homeowners are in fact exempt from the tax.

## 2 Increasing the foreign buyers tax rate to 20%

**Objective:** This point aims to raise the existing foreign buyers tax by 5%, from the original rate of 15% to the new rate of 20%. This action seeks to reduce pressure on the real estate market by further disincentivizing foreign buyers from purchasing property in the B.C. housing market as a speculative investment.

**Approach:** Properties within the taxable area that have been registered on or after February 21, 2018 must pay a tax amount of 20% of the fair market value of their proportionate share.

Progress: It has already been implemented.

### Method

Quantitative

### Indicator(s)

Change (%) of foreign ownership in the market

Track the reduction or change in foreign ownership. Although this doesn't represent cause and effect, it demonstrates the change in foreign ownership since the tax has been in effect.

**Critique:** This point implies that foreign ownership of property is at the root of B.C.'s housing unaffordability. It will also present a question of identity as to who is considered a foreign buyer in B.C., and what this means for the inclusivity of the Province. It is considered by some to be an unfair tax.



# STABILIZING THE MARKET

## 3 Expanding the foreign buyers tax to more areas

**Objective:** This point seeks to expand the foreign buyers tax to more areas of the Province. This action seeks to reduce pressure on the real estate market by further disincentivizing foreign buyers from purchasing property in the B.C. housing market.

**Approach:** The B.C. areas for the foreign buyers tax have been expanded to include the Capital Regional District, the Regional District of Central Okanagan, the Fraser Valley Regional District, and the Regional District of Nanaimo. These changes are found under the Additional Property Transfer Tax Return.

Progress: It has already been implemented.

**Method**

Quantitative

**Indicator(s)**

Change (%) of foreign ownership in the market

Track the reduction or change in foreign ownership. Although this doesn't represent cause and effect, it demonstrates the change in foreign ownership since the taxable area has expanded.

**Critique:** As with the previous point, this point implies that foreign ownership of property is at the root of B.C.'s housing unaffordability. It will also present a question of identity as to who is considered a foreign buyer in B.C., and what this means for the inclusivity of the Province. It is considered by some to be an unfair tax.

## 4 A more progressive property transfer tax

**Objective:** This point seeks a 2% increase on the regular property transfer tax for residential properties valued over \$3 million (from the original 3% tax to an updated tax of 5%). This action targets the upscale real estate market in order to reduce annual increases in the Province's land value.

**Approach:** The tax is calculated on the proportion of the fair market value, and entered into the tax return form titled PTT Calculator for Residential Property over \$3,000,000.

Progress: It has already been implemented.

**Method**

Quantitative

**Indicator(s)**

Track the annual revenue (\$) gained from the PTT

Track the amount of homes (#) valued above \$3 million

It is impossible to say that an increase in PTT will be the cause of a reduction in B.C.'s annual land value numbers. It may, however, be part of the reduction.

**Critique:** Having the number for this higher tax rate set at \$3 million could be critiqued as arbitrary. For example, what happens to properties that are just below this threshold, and why should they be exempt but others just over the threshold not? A more incremental tax increase may be more appropriate and fairer.



# STABILIZING THE MARKET

## 5 Making school taxes more progressive

**Objective:** This point seeks to apply an additional school tax to the most high-valued residential properties in the province, in order to provide a larger share in the cost of providing education in B.C.

**Approach:** An additional tax of 0.2% applies to the residential portion assessed between \$3 million and \$4 million, while an additional tax of 0.4% applies to the residential portion assessed over \$4 million. This tax includes detached homes, stratified condominiums or townhouse units, and most vacant land. B.C. Assessment determines if additional school tax applies, and these rates generally decrease so that average provincial revenues per home only increase by B.C.'s CPI rate of inflation.

**Progress:** It has already been implemented.

**Method**  
Mixed

**Indicator(s)**

Track the increase (%) in the additional school tax revenue raised per year. This is a starting point, that will help in assessing the annual impact of the additional school tax.

**Critique:** This tax could be critiqued as discriminatory in that it targets one asset class, homeowners. It can also be deemed misleading in that it is an additional tax that is not only applied to schools, but also can be spent in various areas to the government's discretion.

## 6 Taxing short-term rentals (Allowing online accommodation providers to apply PST and MRDT on STRs)

**Objective:** This point targets short-term rentals, and is designed to create a more level playing field between hoteliers and short-term rental owners. Prior to this tax, travelers choosing short-term rentals were exempt from the 8% provincial sales tax (PST) that hotels were required to charge.

**Approach:** In participating areas of the Province, unless there is a specific exemption, an 8% PST now applies to sales of short-term accommodation provided in B.C. The up to 3% municipal and regional district tax (MRDT) also applies.

**Progress:** It has already been implemented.

**Method**  
Qualitative

**Indicator(s)**

This point has been implemented. But whether it has actually been adopted by online short-term accommodation providers is the next question. Airbnb's website does not list this under their informational page on Service Fees.

Further analysis may require interviewing an Airbnb host in B.C. and asking how this tax has been adjusted for in their rental price, or service fees.



# STABILIZING THE MARKET

**Critique:** It may be difficult or costly for the government to be able to monitor this point, and whether or not it is actually being practiced. Online short-term accommodation sites are plentiful, and each features many listings.

## 7 Reviewing the homeowner grant to provide fairness for renters

**Objective:** The Province offers support for most homeowners under the Homeowner Grant. This point seeks to review the Homeowner Grant in order to ensure both renters and homeowners benefit in a similar way.

**Approach:** The Province has launched a Rental Housing Task Force consisting of three members including the Premier’s Advisor on Residential Tenancy. The task force will advise on how to improve security and fairness for renters and landlords. They have conducted a provincewide engagement with landlords, renters and other stakeholders. A set of 23 recommendations have been made that seek fair process, safe, secure and affordable housing. The 23 recommendations made in the report by the Task Force have been based on consideration of input received during the engagement process and review of best practices in other jurisdictions.

**Progress:** It is currently in progress.

**Method**  
Qualitative

**Indicator(s)**

An interview with one of the members of the Task Force will be beneficial to judge the progress of this point. There are many recommendations to this point (23) so a summarized continual update would be an appropriate measure for this point. It will also inform which of the recommendations have actually been implemented and enforced, and where.

**Critique:** This point in itself is a completely new round of 23 recommendations all specific and similar to the 30 points of the 30-Point Plan. It will require further investigation in order to develop adequate indicators for the various points of this plan, outside of the current recommendation to perform check-ins with the Task Force. One question at hand for the Task Force would be the way in which these recommendations plan to be monitored in the long-run. It will also be worth questioning whether the original plan to offer a subsidy in the form of the renter grant will be maintained.



## CRACKING DOWN ON TAX FARUD AND CLOSING LOOPHOLES

8. Moving to stop tax evasion in pre-sale condo reassignments
9. Taking action to end hidden ownership, including a new beneficial ownership registry
10. Strengthening provincial auditing and enforcement powers
11. Moving to close property tax loopholes on the ALR
12. Expanding information collection and information sharing with the federal government to prevent tax evasion
13. Seeking permanent provincial-federal action to combat money laundering, tax evasion, and avoidance



# CRACKING DOWN ON TAX FARUD AND CLOSING LOOPHOLES

## 8 Moving to stop tax evasion in pre-sale condo reassignments

**Objective:** This point seeks to obtain more comprehensive information about the reassignment of pre-sale condo purchases, in order to stop tax evasion that is occurring under the current system and the inflation of prices that comes with this selling and reselling of contract assignments under the table.

**Approach:** The Province has created a database that requires developers to collect and report specific information related to pre-sale condo reassignments. This information is shared with federal and provincial tax authorities to ensure that all taxes are adequately paid. Information on all assignments of purchase agreements signed on or after January 1, 2019 are to be entered into the Condo and Strata Assignment Integrity Register (CSAIR) accessed online.

**Progress:** It has already been implemented.

**Method**  
Mixed

**Indicator(s)**

Review the database on pre-sale condo assignments in order to determine whether the information has been reported. Then continue to track annually to see if the amount (#) of reassignments reported has increased or decreased.

**Critique:** This point seeks to stop tax evasion on pre-sale condos, in order to decrease the pressure of the real estate market. Yet, because it is just one of multiple loopholes used to obscure the true nature of ownership in B.C.'s housing market it will be difficult to determine the effectiveness of this point upon implementation.

## 9 Taking action to end hidden ownership

**Objective:** Some residential property owners may hide their ownership behind numbered companies, offshore and domestic trusts, and corporations. This point seeks to end this hidden ownership by tracking beneficial ownership of properties. It will also help in cracking down on tax frauds and money laundering.

**Approach:** In order to track beneficial ownership of properties, the government is in the process of developing a new and publicly accessible beneficial ownership registry. It will hold records on the individuals and give tax auditors, law enforcement agencies and federal and provincial regulators the information needed to conduct their investigations. Draft legislation has been completed for this point under the Land Owner Transparency Act.

**Progress:** It is currently in progress.

**Method**  
Qualitative

**Indicator(s)**

The progress of this point must be tracked by following updates on the draft legislation – has it been implemented? (Y/N). Once implemented, it will be difficult to determine the effectiveness of this point and the results of its implementation on the real estate market.



# CRACKING DOWN ON TAX FARUD AND CLOSING LOOPHOLES

**Critique:** It is still unclear how this point will be enforced since various levels of government are involved. For example, what is the penalty for not sharing this information, and what jurisdiction would a penalty fall under? How will this public registry be actively monitored, and will it be a breach of privacy to the property owners registered?

## 10 Strengthen provincial auditing and enforcement

**Objective:** This point seeks to strengthen provincial auditing and enforcement by providing them with more authority and access to information.

**Approach:** The Province has made additional changes to the Property Transfer Tax Act. These changes include: increasing the limitation period for assessments to six years; enabling the collection of additional buyer information; introducing administrative penalties for non-compliance; extending the application of the general anti-avoidance rules; and enabling tax administrators to compel access to information relevant to transfers such as information held in a Multiple Listing Service database.

**Progress:** It has already been implemented.

Method	Indicator(s)
Qualitative	This point seeks to strengthen auditing and enforcement, with the larger goal of increasing transparency. These newly granted authorities must be monitored, by following changes to the anti-avoidance provisions. An interview may be made with B.C. auditors to determine whether these amendments have made the process of verifying property transfer tax form information easier.

**Critique:** This point is quite straightforward, and it appears that the approach will be able to achieve the objective of the point. Thus there is not a clear critique for this point. However, this point should continue to be monitored, for an amendment to the anti-avoidance provisions is possible if a different political party is voted in for B.C. that seeks to increase privacy of information and limit government auditing and enforcement powers.

## 11 Moving to close property tax holes on the ALR

**Objective:** The goal of this action is to depress speculative development on the provincial ALR (Agricultural Land Reserve). Tax loopholes make residential development on the ALR attractive. For instance, large residential developments can be classified as estates with only meagre agricultural facilities and receive Farm Property property-tax exemptions. ALR developments may also accommodate secondary residential buildings (i.e. helper quarters) – another feature that allows for larger developments on ALR land, attracting investors. The action proposes closing tax loopholes through provincial legislation.



# CRACKING DOWN ON TAX FARUD AND CLOSING LOOPHOLES

**Approach:** It is currently unclear what other kinds of legislation the province will pass in order to close these tax loopholes. Approaches could include the institution of auditing bodies with more stringent classifications for agricultural usage.

**Progress:** It remains unclear whether this point has been implemented.

Method	Indicator(s)
Qualitative	Has appropriate legislation been passed?  What substantive changes in the ALR market have occurred?

**Critique:** While stricter provincial regulations have been put in place, the most recent provincial legislation pertains to housing size for primary and secondary buildings, not to loopholes on the ALR. Critics of the province’s lack of action have suggested the Speculation and Empty Homes tax does not apply to property on the ALR, which some agricultural advocates have said will continue to drive speculative purchases on the ALR (In 2016, the implementation of the Foreign-Buyers Tax caused property values on the ALR to rise dramatically). Provincial Liberals have suggested that these policies will ultimately impose more regulations and difficulties for actual farmers.

## 12 Expanding information collection and information sharing with federal government to prevent tax evasion

**Objective:** Properties in the province are often bought through and exchanged through shell-corporations who make spurious property-tax deduction claims. This action proposes collecting name, citizenship, SINS from property-tax forms and making that information available to federal bodies.

**Approach:** By using SINS to match property tax statements and income-tax information, it will become easier to audit suspicious claims. Because there cannot be enough auditors on the ground to screen homes on a case by case basis, property-tax declarations are an honour system. By forwarding this information to the federal government, income-tax records can be synthesized with their property declarations. This will make the question of who owns a property more transparent: and make falsifying property-tax deductions more difficult.

**Progress:** It is currently in progress.

Method	Indicator(s)
Mixed	How much data (e.g. SINS) have been collected?  How much money has been raised from these changes?



# CRACKING DOWN ON TAX FARUD AND CLOSING LOOPHOLES

An annual assessment based on reports and consultation with appropriate representatives (e.g. the Attorney General's office).

Assess substantive changes in frequency of tax evasion.

**Critique:** It remains to be seen how effective this will be at clamping down on tax evasion. This action primarily pertains to preventing owners from taking advantage of the homeowner's grant. But there are other ways of disguising or circumventing suspicion – a self-employed owner or investor can redirect their earnings to elude suspicion. If a shell-corporation has purchased a property, there is no certainty that the reported owner of a property is the beneficial owner – they could choose to report an appropriate individual's information. It is also unclear whether the current organizational capacity of auditing structures will permit pursuing this action: no money has been promised for this action.

## 13 Seeking permanent provincial-federal action to combat money laundering, tax evasion, and avoidance

**Objective:** Money laundering through real estate and casinos is a major influence on speculative housing in British Columbia. Connected to the fentanyl trafficking and international crime, police projections posit that as much as five billion dollars have laundered through transactions in the Vancouver housing market. This influx of money is inflating housing prices and connecting our housing market to criminal activity.

**Approach:** This action proposes the creation of a multi-agency group, with federal and provincial actors, who will collect data and enforce compliance in order to reduce tax fraud and combat money laundering.

The 2019 Federal Budget indeed includes provisions for money laundering, specifically through the "Strengthening Canada's Anti-Money Laundering and Anti-Terrorist Financing (AML/ATF) Regime" program of the "Creating New Change" platform (Canada Budget, 2019). The plan is to...

"Strengthen federal policing operational and investigative capacity by providing up to \$68.9 million over five years; Create the Anti-Money Laundering Action, Coordination and Enforcement (ACE) Team, which will bring together dedicated experts from across intelligence and law enforcement agencies to strengthen inter-agency coordination and cooperation and identify and address significant money laundering and financial crime threats; Create a multi-disciplinary Trade Fraud and Trade-Based Money Laundering Centre of Expertise, which will complement the efforts of the ACE Team..."



# CRACKING DOWN ON TAX FARUD AND CLOSING LOOPHOLES

Notably, British Columbia is the only province specifically named in this budget outline: “Strengthen operational capacity at FINTRAC, Canada’s AML/ATF regulator and financial intelligence unit to increase outreach and examinations in the real estate and casino sectors with a focus on the province of British Columbia.”

**Progress:** It is currently in progress.

Method	Indicator(s)
Mixed	How much data has been collected?  An annual assessment based on reports and consultation with appropriate representatives (e.g. the Attorney General’s office).  Are there substantive changes in the frequency of money laundering corresponding with FINTRAC funding and activity?

**Critique:** This is one of the less transparent actions in the 30-Point Plan. Although the 2019 budget accommodates progress, it is unclear what the effectiveness of these countermeasures will be. As this action requiring ongoing federal support, the future of this program may also be tenuous given an imminent election.

Additionally, while B.C.’s Attorney General is launching a probe into money laundering / and lenders’ use of real-estate assets, many are requesting a public inquiry into the previous provincial government’s culpability. It is worth evaluating how much of the current infrastructure permits ongoing money laundering, and whether the problem can be addressed without sufficient will from provincial politicians.



## **BUILDING THE HOMES PEOPLE NEED**

14. Making a \$6 billion-plus investment in affordable housing
15. Building rental units for the missing middle - more than 14,000 units for individuals, working families and seniors
16. Housing for women and children affected by violence
17. Working with universities, institutes and colleges to build new student housing
18. Fixing existing projects with an eye to ensuring affordability for British Columbians
19. Partnering with Indigenous communities to invest \$548 million over 10 years in social housing
20. Building 2,500 new supportive homes for people struggling with homelessness



# BUILDING THE HOMES PEOPLE NEED

## 14 Making a \$6.6. billion-plus investment in affordable housing

**Objective:** Through partnerships, the provincial government will deliver 114,000 affordable homes over the next 10 years. This entails an investment of \$6.6 billion from the provincial government, to be allocated over these ten years.

**Approach:** Funding in this program can be seen distributed across other actions in Section 3. Partnerships with agencies at all levels will provide a stream of development proposals and partnerships that the provincial fund can facilitate. B.C. Housing has also established the B.C. HousingHub: a subsidiary organization that will facilitate the outreach necessary for progression on this action.

Progress: It is currently in progress.

Method	Indicator(s)
Quantitative	How much money has been spent?
	How many projects are in development or have been completed?

**Critique:** The development of new housing through this fund is dependent on the health of the various sectors applying for funding. While all of the funds linked to this \$6.6 billion are receiving positive feedback, and there are lots of developments on-track, the viability of many projects depends on the continuing viability of not-for-profit service providers. Evaluation of each fund should also be evaluations of the partners that B.C. Housing are partnering with: if they are quality organizations, if their services are effective, whether they are effective at balancing budgets, their hiring procedures, and so on. In terms of evaluating the developments, the first EOI (expression of interest) periods were in 2018, and each fund is only in the early stage, so information about development is still not entirely transparent. Another general critique that extends across the \$6.6 billion fund is whether it is allotting for a sufficient increase in the amount of rental and supportive housing. While progress is underway, it is unclear if these programs can meet demand given the Lower Mainland’s growth-rates.

One could also take the critical political perspective that the social enterprise framework of this action – “[creating] more affordable housing without ongoing government financial assistance or operating subsidies” (Service Plan) – belies the government’s inability to take a more hands-on approach: namely, because of the erosion of federal transfer payments and austerity measures in the 90s. This is a conceptual and speculative critique more than one that would be helpful given the tools that the province has to work with: but it is interesting to weigh the advantages and disadvantages that a big-government approach could provide.



# BUILDING THE HOMES PEOPLE NEED

## 15 Building rental units for the missing middle – more than 14,000 units for individuals, working families, and seniors

**Objective:** An investment of near \$1.9 billion over 10 years to develop 14,350 units of mixed-income affordable rental housing for independent families and seniors.

**Approach:** The Community Housing Fund will partner with nonprofits, co-operatives, and local governments to subsidize developments so that they can eventually run with self-sustaining revenue models, and offer affordable rentals. The affordability of these projects will be ensured by 60 year operational agreements. RFP periods will request developments that reflect a mix of incomes: i.e. a 30/50/20 distribution of “affordable housing” (i.e. moderate income rental), “RGI” (rent-geared-to-income), and “deep subsidy.” Funding priority is for developments aimed at seniors and working families (individual housing takes least precedent). Notably, these will not be supportive homes (e.g. offering in-house seniors support services).

Progress: It is currently in progress.

**Method**  
Mixed

**Indicator(s)**

How much money has been spent?

How many units are in development or have been completed?

Interviews with non-profit housing providers to determine whether the units promised will be delivered; whether there are any problems emerging with the program requirements; and whether the homes are reaching those who need them the most.

**Critique:** Even if a given partner argues during the RFP process that this fund be best directed – given their community’s circumstances – into housing for independent adults, that is not this fund’s priority. It is surely harder to house families and seniors, but perhaps the overall fund does not sufficiently address the need to house working adults in a sustainable and affordable sense.

Disparities in RGI revenue and RFP rental projections may inflate the costs of some developments. Costs could be made up for projects depending on what rates are set for affordable units, which may overall distort the affordability of the development – and, in more dramatic cases, contribute to gentrification in vulnerable areas.

## 16 Housing for women and children affected by violence

**Objective:** This action will invest \$734 million over 10 years to build and operate 1,500 new units of housing including transition houses, safe homes, second-stage, and long-term housing.



# BUILDING THE HOMES PEOPLE NEED

**Approach:** As with the Supportive Housing Fund, development proposals will be accepted on an annual basis. These RFP periods will recruit non-profit service providers to ensure that developments will have the services and organizational capacity for long-term viability. The program will be informed by a women-centred approach to service delivery, safety and security for women and children, an acknowledgement of power imbalances in the service process, an open and collaborative sector environment, and transparent delivery.

**Progress:** It is currently in progress.

**Method**  
Mixed

**Indicator(s)**

How much money has been spent?

How many units are in development or have been completed?

Interviews with non-profit housing providers to determine whether the units promised will be delivered; whether there are any problems emerging with the program requirements; and whether the goals set are ambitious enough to meet the demand for this type of housing.

**Critique:** While the means of the program appears to be effective, it is worth evaluating the efficacy of B.C. Housing’s data analysis. This analysis will be used to determine what kind of housing and services for women and children affected by violence is appropriate for what kinds of communities. It is also worth determining what pace and urgency this action is moving with. While Group B has determined that 227 units and 60 beds – spread across safe homes, transition housing, second stage housing, and permanent housing – are being delivered: the original lack of supply means that this rate of delivery will have to be maintained.

## 17 Working with universities and colleges to build housing

**Objective:** This action aims to produce 5,000 new and affordable spaces in student housing (affordable, on-campus homes).

**Approach:** B.C. Housing has allocated \$450 million that can be loaned to post-secondary institutions to finance new student-housing and ensure it is affordable. An example of this loan strategy would be the new UVIC student housing development, partially financed by a \$123 million loan from this fund.

**Progress:** It is currently in progress.

**Method**  
Mixed

**Indicator(s)**

How much money has been lent?

How many units are in development or have been completed?



# BUILDING THE HOMES PEOPLE NEED

## Method

## Indicator(s)

Interviews with university housing providers to determine whether the units promised will be delivered; whether there are any problems emerging with the program requirements; and whether the homes are reaching those who need them the most.

**Critique:** Only a handful of loans have been approved through this action. Though the response from student lobbyists and schools is evidently positive (CBC News, 2018), this action is behind others in the fund.

Because these will be loans to campuses, the guarantee on protections relating to rental or affordable housing is more limited. B.C. Housing has the discretion to select projects for approval, but campus-wide residence fee increases would not fall under governmental jurisdiction, nor would non-negotiable move-out dates (these factors exacerbate the circumstances of students requiring affordable on-campus housing). While on-campus housing is a large part of ensuring affordability for students, there needs to be less precarious options off-campus that are adjacent to transit routes.

## 18 Fixing existing projects with an eye to ensuring affordability for British Columbians

**Objective:** There has been insufficient provincial investment into existing affordable homes projects. Balancing the budgets of these projects has become more difficult, with rising construction costs, trades shortages, and other cost factors meaning costs will drive rent up past the level of affordability that these homes were meant to service.

**Approach:** The provincial government is promising to commit \$75 million in subsidies over the next two years to in-development 4,900 homes in-development to ensure they remain affordable. Like other projects in the Building homes fund, RFP periods will be hosted to find appropriate partners.

**Progress:** It is currently in progress.

## Method

Quantitative

## Indicator(s)

How much money has been lent?

How many units are in development or have been completed?

**Critique:** This is a strong point which acknowledges that the development of new affordable housing should not supplant existing developments or extant affordable housing. As with other projects in this fund, it will be necessary to critically evaluate which partners are receiving these funds, whether there is a good geographical distribution of projects, and that affordability compliance measures are in place if the funding is made available.



# BUILDING THE HOMES PEOPLE NEED

## 19 Partnering with Indigenous communities to invest \$548 million over 10 years in social housing

**Objective:** In partnership with the Aboriginal Housing Management Association, the Indigenous Housing Fund Program offers \$550 million over 10 years to build 1,750 new units of social housing that is on and off reserve. The program is aimed at Indigenous families, seniors, individuals, and persons with a disability.

**Approach:** Annual RFP periods will solicit projects, with upwards of \$200,000 available per unit. This is twice the amount that can be allotted through CMHC for projects. Previous budgets, such as the 2017 provincial budget, have reserved Indigenous funding for housing that is not on reserve. Opening up this fund is a positive direction that will take much-needed action towards improved quality and availability of on-reserve housing.

Progress: It is currently in progress.

**Method**  
Mixed

**Indicator(s)**

How much money has been lent?

How many units are in development or have been completed?

Interviews with non-profit housing providers to determine whether the units promised will be delivered; whether there are any problems emerging with the program requirements; and whether the homes are reaching those who need them the most.

**Critique:** As with other Building B.C. Fund projects, the fund pertains to housing development, whereas the overall program will entail multi-agency campaigning and research. In the particular case of Indigenous communities, planning for culturally appropriate housing is key. This can include spaces within each project accommodating of Indigenous cultural practices. For instance, in Northern Canada, culturally appropriate housing may entail rooms for restocking supplies, large-scale family gathering, and an appropriate space for processing wild animals. Besides evaluating the scale of development, research on resident feedback ought to be a metric. Evaluation of this action’s progress should also encompass evaluation of the outreach, research, and collaboration informing each development. Additionally, because on-reserve housing falls under different jurisdiction from municipal housing, the enforcement of loans will be more difficult to facilitate.

## 20 Building 2,500 new supportive homes for those struggling with homelessness

**Objective:** This action is manifesting in the Rapid Response to Homelessness fund, which entails \$291 million in capital funding and operational funding of \$216 over three years. This will provide funding for 2,500 new supportive homes that offer 24/7 support.



# BUILDING THE HOMES PEOPLE NEED

**Approach:** Similar to other programs in the Supportive Housing fund, developments will be proposed on an annual basis. The focus of this fund is temporary modular housing, as it can be constructed and deployed quickly, bringing faster relief to homeless communities.

**Progress:** It is currently in progress.

**Method**  
Mixed

**Indicator(s)**

How much money has been lent?

How many units are in development or have been completed?

Interviews with non-profit housing providers to determine whether the units promised will be delivered; whether there are any problems emerging with the program requirements; and whether the targets are ambitious enough to meet the need for this type of housing.

**Critique:** Part of the periphery action of this fund will be evaluative research on both neighbourhood and tenant feedback to new modular developments, along with the development of new public engagement tools. There is currently a great deal of controversy with modular housing and many communities are launching campaigns against them. One entire municipality – Maple Ridge – is at odds with the province, which is now using its jurisdictional authority to enforce the development of a modular housing development in the municipality. This is not so much of a critique of the Rapid Response fund. Rather, it is worth emphasizing that ongoing evaluation will also have to focus on the efficacy of evaluative research and promotions campaigns that are key to the ongoing adoption of modular housing projects. And, once tenants have settled in, it will be important to gauge whether these developments are suitable to their needs. For instance, while many homeless individuals experience mobility impairments, not all modular housing developments offer elevators.



## SECURITY FOR RENTERS

21. Expanding and increasing benefits to seniors living independently
22. Expanding and increasing the Rental Assistance Program to help working parents
23. Strengthening protections for renters and manufactured home owners
24. Extending the life, quality and affordability of existing affordable housing



# SECURITY FOR RENTERS

## 21 Expanding and increasing benefits to seniors living

**Objective:** Many seniors in the Province struggle to keep up with increasing rents. This point seeks to make housing more affordable for low income seniors who rent their homes by increasing rental supports.

**Approach:** The Shelter Aid For Elderly Renters Program (SAFER) provides monthly cash payments to subsidize rents for eligible B.C. seniors (60 and over) who pay more than 30% of their before-tax income for rent. Updates to the program came into effect in September 2018 through an increase to the monthly benefit. With this, seniors may receive up to an extra \$930 per year.

Progress: It has already been implemented.

Method	Indicator(s)
Mixed	<p>Program budget (\$/year). Track if it's increasing or decreasing</p> <p>#of senior households covered by the program per year.</p> <p>Interviews with program recipients will help monitor, assess and improve future modifications and updates for this point.</p>

**Critique:** The program appears to be working in an effective manner. However, many seniors may still have to spend much more than 30% of their income in rent. And unlike other vulnerable groups, they have a stagnant or diminishing income that is not likely to improve over time.

Studies (Senior's Housing in B.C.) explain that a high percentage of low-income senior renters are not aware of the SAFER program. Therefore, many of those who most need this assistance do not know about it. It would be worth evaluating the promotion of this program to achieve better outreach and impact over time. This provincial program should also be supported by an increasing supply of affordable rental housing that addresses the needs of seniors.

## 22 Expanding and increasing the rental assistance to help working parents

**Objective:** This point aims to expand the eligibility criteria and increase the amount of benefit from the Rent Assistance Program (RAP) to provide low income families with cash assistance to help with their monthly rents.

**Approach:** This action reinforces the importance of RAP, which was implemented in 2006. In September 2018, the program was modified to aid families with a maximum annual household income of \$40,000, from the previous maximum amount of \$35,000.



# SECURITY FOR RENTERS

**Progress:** It has already been implemented.

**Method**  
Mixed

**Indicator(s)**

Program budget (\$/year). Track if it's increasing or decreasing

#of assisted households per year

Interviews with program recipients will help monitor, assess and improve future modifications and updates for this point.

**Critique:** Even though changes have been made to improve the program, there is a need to look for ways to keep expanding the eligibility criteria, because there are still vulnerable groups who require assistance and are excluded by the applied standards (e.g. families who rely on social assistance but still need to pay rent, families living in cities where rents are high and increasing, etc), and the value of subsidies for making an impact in their monthly expenses. This provincial program should be encouraged by the supply of affordable rental housing addressing the needs of families.

## 23 Strengthening protection for renters and manufactured home

**Objective:** The residential tenancy laws and services are not meeting B.C. inhabitants' needs. This point seeks to update and improve housing laws to ensure more fairness for renters, but also, balancing the rights of owners.

**Approach:** The Residential Tenancy Act has not undergone a review in 16 years. Therefore, there is a gap between the needs of renters and owners and the law.

In April 2018, the Rental Housing Task Force (RHTF) was appointed to advise on how to improve security and fairness for renters and rental housing providers in B.C. The Task Force conducted participative engagement with landlords, renters and other stakeholders throughout the province. and in December 2018, the RHTF released its final report and identified twenty-three recommendations on how to make the rental housing system fairer by dealing with renovictions, making renting more secure, and improving enforcement of regulations and laws.

As a result of these recommendations, changes to the Residential Tenancy Act were made to set the annual allowable rent increase to 2.5% to match inflation. Previous to the RHTF report, updates were done to the Residential Tenancy Act and the Manufactured Home Park Tenancy Act to improve security for renters facing eviction. Additionally, the Province is investing in the Residential Tenancy Branch to facilitate further policies relating to landlords and tenants.



# SECURITY FOR RENTERS

Progress: It is currently in progress.

### Method

Qualitative

### Indicator(s)

Check to determine whether changes to BC’s tenancy laws to protect tenants and owners, according to the recommendations made by the RHTF being made.

Further assess the correlation between the cases presented to the Residential Tenancy Branch and recommendations presented in the RHTF’s report to see if tenancy problems are being addressed.

**Critique:** The recommendations of the RHTF were released in December 2018, therefore, they are still under consideration and it is too early to provide a notable evaluation on the implementation process. It would be worth making a further assessment on the correlation between the cases presented to the Residential Tenancy Branch and the problems and recommendations presented in the RHTF’s report to see if tenancy problems are being addressed and solved.

## 24 Extending the life, quality and affordability of existing affordable housing

**Objective:** This point seeks to ensure the quality of social housing by making it safe and secure. The province will invest \$1.1 billion over 10 years into disaster upgrades (e.g. seismic, fire), essential building repairs, and maintenance. These fixes will also implement more sustainable building elements to lower energy costs and carbon emissions.

**Approach:** This point does not refer to a specific program for the allocation of this investment. Still, BC has several “Home Improvements Assistance Programs:”

- Home Adaptations for Independence: helps low-income seniors and people with disabilities finance home modifications. Homeowners, renters and landlords are eligible.
- Efficiency BC: offers financial incentives and support to help households save energy and reduce GHG emissions. It is co-funded with the federal Low Carbon Economy Leadership Fund.
- Residential Rehabilitation Assistance Program On-Reserve: financial assistance to repair homes to a minimum level of health, safety and accessibility.
- Green Home Program: CMHC program that helps make energy-efficient housing more affordable.
- Capital Fund: to upgrade and improve non-profit and provincially-owned public housing units.



# SECURITY FOR RENTERS

**Progress:** It is currently in progress.

Method	Indicator(s)
Quantitative	Budget allocated to maintain/improve social housing per year
	#of units upgraded and repaired
	Facility Condition Index. Is the cost of a building's renewal and replacement needs divided by its replacement cost, expressed as a percentage. $FCI = \frac{\text{Total of Building Repair/Upgrade/Renewal Needs (\$)}}{\text{Current Replacement Value of Building Components(\$)}}$

**Critique:** The point is unclear and there is uncertainty on which program/s will receive the proposed budget, or the ultimate distribution. The point mentions “investment in refits and renovations of social housing,” but the programs mentioned do not necessarily target social housing. Most of them are meant to benefit all applicants: be they residents, renters or owners.



## SUPPORTING PARTNERS TO BUILD AND PRESERVE AFFORDABLE HOUSING

25. HousingHub: Building Partnerships. Building Homes
26. Empowering local governments
27. Expanding the use of MRDT revenues for affordable housing
28. Encouraging more rentals via property tax exemptions
29. Empowering homeowners in stratas to deal with short-term rentals
30. Expanding transit and building communities



# SUPPORTING PARTNERS TO BUILD AND PRESERVE AFFORDABLE HOUSING

## 25 HousingHub: Building partnerships. Building homes

**Objective:** This point seeks to create the HousingHub: to build partnerships with the non-profit sector, faith groups, for-profit builders, all levels of government, and others to develop or re-develop available land to produce affordable housing.

**Approach:** In 2018, the HousingHub was created as a centre for community partners and private industry to collaborate on developing new construction or redeveloping existing sites for affordable housing, for rent and for purchase.

The HousingHub will operate the Provincial Rental Supply and Affordable Home Ownership Programs to increase the supply for middle income households. Additionally, through its partnerships, the HousingHub will be able to provide low-cost financing and access to land.

Progress: It has already been implemented.

Method	Indicator(s)
Mixed	How many coordinated projects with owners looking to invest in affordable housing?
	How many affordable units have been created?
	How many new rental/ owner purchased units through HousingHub?
	What is the budget allocated to projects/year?
	There should be an ongoing assessment on the operation and viability of completed projects to evaluate the opportunities and challenges that they are facing.

**Critique:** This point is quite straightforward, and HousingHub appears to be working in an effective manner. However, since the HousingHub started operating, only several projects have been finalized. Further research should be done to assess the operation and viability of completed projects, and to evaluate the opportunities and challenges that they are facing.

## 26 Empowering local governments

**Objective:** This point aims for the Province to provide power to local governments to develop different tools and instruments to support and accelerate the development and maintenance of affordable housing supply.

**Approach:** The provincial government will allocate \$5 million over three years to help fund housing need assessments for local governments.

To date, amendments to the Local Government Act and Vancouver Charter have been done to provide municipal governments with the authority to zone for residential rental tenure, or rental-only zoning.



# SUPPORTING PARTNERS TO BUILD AND PRESERVE AFFORDABLE HOUSING

**Progress:** It is currently in progress.

**Method**  
Mixed

**Indicator(s)**

Technical tools developed to support local governments (And assess the success of these tools, by contacting local government that has used them)

What is the #of local housing needs assessments per year?

Compiled record of tools developed by municipalities to address affordable housing

**Critique:** In order to monitor this point, it would require a deeper research on what are municipalities of BC doing on the development of new tools to support affordable housing. The progress might be different for all municipalities since they all have different technical capacities and housing contexts. As part of the monitoring tools, there should be a record of the different tools being used and developed by the different local governments of the province.

## 27 Expanding the use of MRDT revenues for affordable housing

**Objective:** The seeks to expand the use of the Municipal and Regional District Tax (MDRT) revenues to support affordable housing purposes.

**Approach:** The MRDT provides funding for local tourism marketing, programs and projects. In the 2018 Provincial Budget, affordable housing was added as a permissible use of the funds. The recipients can define and fund affordable housing initiatives that they believe meet with local needs.

**Progress:** It has already been implemented.

**Method**  
Mixed

**Indicator(s)**

MRDT local revenue

MRDT funds invested in affordable housing

Evaluation on whether the funds are targeting affordable housing initiatives and needs.

**Critique:** The inclusion of affordable housing as a use of the MRDT will make local governments aim for this fund for purposes other than tourism. Of course, this means that poor usage of the fund can have a negative impact on actual tourism activity and revenues. That said, in-depth evaluation is mandatory on the implementation of the MRDT funds in each area to determine how they are targeting affordable housing.



# SUPPORTING PARTNERS TO BUILD AND PRESERVE AFFORDABLE HOUSING

## 28 Encouraging more rentals via property tax exemptions

**Objective:** This point aims to increase the available property tax exemptions provided by municipal revitalization agreements.

**Approach:** The Community Charter in Section 226 provides jurisdiction to exempt property from municipal property value taxes. Revitalization tax exemptions are a tool that municipalities may use to encourage revitalization, or to achieve a range of environmental, economic or social objectives. Regarding social objectives, exemptions can be used to encourage affordable housing, through development or preservation. As part of the agreement, municipal councils are free to specify the amounts and extent of tax exemptions available.

Progress: It has already been implemented.

Method	Indicator(s)
Quantitative	Track # of property tax exemptions provided under revitalization agreements
	Track # of qualified purpose-built rental housing

**Critique:** This is a tool that may be used in specific projects by Council to their own criteria and discretion. Therefore, it is important to make an in-depth assessment on what the agreement will contain, by balancing the loss of tax revenue and the supply of affordable housing.

The implementation of other types of incentives should be also assessed, such as the reduction of Development Cost Charges, as a way to encourage developers in the production of affordable housing.

## 29 Empowering homeowners in stratas to deal with short-term rentals

**Objective:** Whether short-term rentals should be permitted has been a common issue for stratas across the province. This point seeks to support homeowners who have decided to limit or ban short-term rentals in strata buildings, by providing enforcement of the bylaws.

**Approach:** Bylaws determine many rights and responsibilities of a strata lot owner. Strata corporations can decide whether to adopt or not a bylaw which can allow certain kinds of pets, establishment of quiet hours, and specific to this point, to limit or ban short-term rentals.

For those who want to implement and enforce the law, in November 2018, the fine for owners or residents violating a short-term rental strata bylaw was increased to \$1,000 a day from the previous maximum fine was of \$200 per day.



# SUPPORTING PARTNERS TO BUILD AND PRESERVE AFFORDABLE HOUSING

Progress: It has already been implemented.

**Method**

Mixed

**Indicator(s)**

\$ of collected fines / year

Evaluate if the increment of fines has improved the condition of short-term rentals and whether another adjustment (decrease or increase) is needed.

**Critique:** The increment of the fine changed drastically from \$200 to \$1000. Since these modifications were done at the end of last year, it is early to provide an evaluation on the impact of these fines. It is necessary to evaluate if the increment of fines has improved the condition of short-term rentals and whether another adjustment (decrease or increase) is needed.

## 30 Expanding transit and building communities

**Objective:** This point seeks to work with Translink and local governments in Metro Vancouver to increase density and improve the availability of affordable housing around transit stations.

**Approach:** This point is limited only to Metro Vancouver. Since 2017, Metro Vancouver and its partners (BC Housing, BCNPHA, CMHC, Translink, Vancity and others) have been working on studies within the “Transit-Oriented Affordable Housing Study (TOAH)” to understand and assess the opportunities and constraints for building affordable housing in transit-oriented locations. Research is still in progress and findings will be rolled out this year. The Phase 2 Report (presented on April 5, 2019) includes findings about the effectiveness, limitations, and applicability of specific tools to support the delivery of new transit-oriented affordable rental housing supply in the region.

The region is also evaluating the feasibility of a Transit-Oriented Affordable Housing Fund as a financial mechanism to aid affordable housing development and incentivize the supply around high-traffic transit development areas.

For the past years, Metro Vancouver has been implementing a transit-oriented development model in its cities. But bringing affordable housing into the scope (especially to deter the gentrification that is associated with new transit infrastructure) is a challenge that must be addressed.

Progress: It is currently in progress.

**Method**

Quantitative

**Indicator(s)**

Projects located in frequent transit development areas / year

New affordable housing units located in frequent transit development areas / year



# SUPPORTING PARTNERS TO BUILD AND PRESERVE AFFORDABLE HOUSING

**Critique:** Research is yet to be fully made available. Therefore, it is difficult to determine the implementation progress of this point. It is well-known that Metro Vancouver has different transit projects on its way, making opportunities for the insertion of affordable housing, which should be measured and assessed.

Also, it will be a opportunity to experiment and evaluate the financial viability of different instruments such as development charges, density bonuses, rental zoning and others in favor of the development of affordable housing.

Since this point is limited to Metro Vancouver, it is clear that they are conceptual leaders here. But what about the other municipalities within the province? It would be necessary to assess how municipalities outside the Lower Mainland are connecting affordable housing with sustainable transit infrastructure.

# Report Card

	Point	Progress	Method	Indicator/Measure
Stabilizing the market	1. Taxing speculators	●	Quantitative	Change (%) in the proportion of property vacancies
	2. Increasing the Foreign Buyers Tax	●	Quantitative	Change (%) of foreign ownership in the market
	3. Expanding Foreign Buyers Tax to more areas	●	Quantitative	Change (%) of foreign ownership in the market
	4. Increasing PTT on homes over \$3 million	●	Quantitative	Track the annual revenue (\$) gained from the PTT Track the amount of homes (#) valued above \$3 million
	5. Increasing the School Tax on homes over \$3 million	●	Mixed	Track the increase (%) in the additional school tax revenue raised per year
	6. Allowing online accommodation providers to apply PST and MRDT on STRs	●	Qualitative	Interview an Airbnb host or staff member in B.C. and asking how this tax has been adjusted for in their rental price, or service fees.
	7. Review Homeowner Grant to provide fairness for renters	●	Qualitative	An interview with one of the members of the Task Force.
Cracking down on tax fraud and closing loopholes	8. Stop tax evasion in pre-sale condo reassignments	●	Mixed	Change in amount (#) of reassignments reported
	9. End 'hidden ownership'	●	Qualitative	Has it been implemented? (Y/N)
	10. Strengthen provincial auditing and	●	Qualitative	Monitor for changes to B.C.'s anti-avoidance provisions.
	11. Close tax loops on ALR	●	Qualitative	What legislation has been passed? What substantive changes in the ALR market have occurred?
	12. Works with federal government to prevent tax evasion	●	Mixed	How much data (e.g. SINS) have been collected? How much money has been raised from these changes? An annual assessment based on reports and consultation with appropriate representatives Assess substantive changes in frequency of tax evasion.
	13. Combat money laundering	●	Mixed	How much data has been collected? An annual assessment based on reports and consultation with appropriate representatives Are there substantive changes in the frequency of money laundering corresponding with FINTRAC funding and activity?



# Report Card

	Point	Progress	Method	Indicator/Measure
Building homes people need	14. \$6.6 billion investment over 10 years	●	Quantitative	How much money has been spent? How many units are in development or have been completed?
	15. Build 14,000 rental units for missing middle	●	Mixed	How much money has been spent? How many units are in development or have been completed? Interviews with non-profit housing providers
	16. Housing for women and children affected by violence	●	Mixed	How much money has been spent? How many units are in development or have been completed? Interviews with non-profit housing providers
	17. Working with universities and colleges to build housing	●	Mixed	How much money has been spent? How many units are in development or have been completed? Interviews with university housing providers
	18. Fixing existing project with an eye to affordability	●	Quantitative	How much money has been lent? How many units are in development or have been completed?
	19. Partnering to build social housing for indigenous people	●	Mixed	How much money has been spent? How many units are in development or have been completed? Interviews with non-profit housing providers
	20. Build 2,500 supportive housing units	●	Quantitative	How much money has been spent? How many units are in development or have been completed? Interviews with non-profit housing providers
	21. Expanding and increasing benefits to seniors living independently	●	Mixed	Program budget (\$/year), tracking if its increasing or decreasing Number of senior households covered by the program per year Interviews with program recipients.



# Report Card

	Point	Progress	Method	Indicator/Measure
Security for Renters	22. Increase rental assistance to help working parents	●	Mixed	Program budget (\$/year) Number of assisted households per year Interviews with program recipients.
	23. Strengthen protection for renters and manufactured home owners	●	Qualitative	Changes to BC's tenancy laws Correlation between the Residential Tenancy Branch and the RHTF's report .
	24. Extend life, quality, and affordability of affordable housing	●	Quantitative	Budget allocated to maintain/improve social housing per year Number of units upgraded and repaired Facility Condition Index
Supporting partners to build and preserve affordable housing	25. Housing Hub	●	Mixed	# of coordinated projects # of affordable units created # new rental/ owner purchased units Budget allocated to projects/year Assessment on the operation and viability of completed projects
	26. Empowering local governments	●	Mixed	Technical tools developed to support local governments # of local housing needs assessments per year Compiled record of tools developed by municipalities
	27. Expanding use of MRDT revenues	●	Mixed	MRDT local revenue MRDT budget invested in affordable housing Evaluation on whether the funds are targeting affordable housing initiatives and needs.
	28. Encourage rentals via property tax exemptions	●	Quantitative	Track # of property tax exemptions provided under municipal revitalization agreements Track # of qualified purpose-built rental housing
	29. Empowering Homeowners in Stratas to deal with STRs	●	Mixed	\$ of collected fines / year Evaluate if the increment of fines has improved the condition of STRs
	30. Expanding transit and building communities	●	Quantitative	Projects located in frequent transit development areas / year New affordable housing units located in frequent transit development areas / year



# Discussion

## Project Constraints and Limitations

One of the most pressing challenges was our knowledge gap on the topic. All group members were relatively unfamiliar with taxation systems, means of combating speculation, and best-practice housing policies. We addressed this with targeted research and consultation with the course's professor — Noha Sedky of City Spaces — in order to build our understanding and refine the indicators and methods for measurement. In future iterations of the project, more emphasis on meeting with professionals and experts from the beginning would be helpful. Recruiting a breadth of knowledge and skill-types would be valuable for this project.

Some of the points were difficult to assess, or to discern in terms of quantitative or qualitative indicators. It was difficult to develop indicators for some of the points due to the seeming lack of causality with what they had sought to achieve. For instance, point 1 of the 30-Point Plan seeks to tax speculators “who are driving up housing costs.” Yet, it would be unclear how to determine the causal effect of this point alone as the vehicle that drives up housing prices and removes rental stock from the market. While it will be interesting to monitor the number of declarations made per year, and the percentage of foreign speculators entering the market each year after this tax is implemented, it can not be determined that this point will be the direct causal force for the market changes.

Because projects are in their early stages, information is not consolidated. For instance, even looking at B.C. Housing's website to track the progress of the \$6.6. billion fund will be difficult because there is no one place where you can see the point on the plan, how it connects to various agencies, the most recent actions, RFP protocols, and developments underway. Instead, it is the responsibility of interested parties to connect the dots. As the plan develops, we expect reports will make clear how each point is developing.

A lack of knowledge regarding available and publicly accessible data was another constraint that meant we had to focus more on performing a literature review, and less on more intensive research necessary for discerning indicators. In many cases we would have to refer to webpages with only general descriptions of the programs.

## Lessons Learned

Planners are often tasked with developing recommendations or strategies and applying them to complex urban problems. It is important to understand how the intended effects of these recommendations may play out in actuality, or how to measure their effectiveness after implementation. In preparing this report, our team has come to understand the importance of developing recommendations with strong methods and indicators, that allow for more accurate measuring and monitoring of their success after implementation. In our critical analysis of each of the points in the 30-Point Plan, we have learned that even points that sound great on the surface and that appear to have good intentions in their output, may actually be too vague, general, or difficult to measure. As planning students developing an evaluation framework for this report, we can now appreciate the importance of developing effective recommendations in any work that we pursue in our future careers.

# Discussion

It remains to be seen whether having this plan and mandate available will result in greater action and commitment than if no plan was available. However the production of our report card demonstrates positive details. For one, there is a good balance of focus on qualitative, quantitative, and mixed approaches. The breadth is substantial, with supply-side challenges being addressed by a real commitment of funding: not just policy encouragements and research. While research oriented points are present, they are not predominant – action is. And qualitative points, which often have a looser causal link between their actions and objectives – such as the implementation of new tax legislation and auditing bodies – try to make as transparent as possible actions that are meant to discourage and punish poor real estate practices. Just a survey of the report card will also show that a year-out, most points have either been implemented or are on-track. So far, from our perspective in giving a broad overview, progress is good.

As the 30-Point Plan is still in its early stages, how reports will roll out, and where metrics for progress can be found is still indeterminate. However, we believe our rubric demonstrates the effectiveness of having a single document which makes quick reference of what each point of the plan entails, and how to evaluate progress on it. Many points on the plan extend beyond what funding or legislation the provincial government can offer. For instance, Section 3 – Building the Homes People Need – speaks to funding for the development of not-for-profit affordable housing. However, each point also captures an array of promotional tools, public engagement, research on tenant and neighbourhood feedback to new developments, and so on. Only some points of the plan capture the full breadth of action that a point is meant to address. This is an issue of clarity which we believe the rubric can help alleviate.

## Suggested Research Initiatives

As the 30-Point Plan has only been implemented for a year, some of the points require more time to develop, be implemented, and be made ready for evaluation. It is worth considering how we can work best according to this timeline, how much capacity we have to check in on points that haven't been implemented yet, and how to gauge whether we can report accurately on the status of their implementation. For instance, one point to question is on when it would be appropriate to measure the effectiveness of some of the points, and what points would require more time before determining their effect.

While the 30-Point Plan is the initiative of the current NDP minority government, many points on the plan require ongoing funding and coordination. As such, a change in government could disrupt several of the points. It is worth considering how best we can format our research findings so as to be valuable given that the plan could become obsolete.

In these cases, a focus on interviews and occasional updates from Provincial staff would be the best way to stay up to date on the plan. We would also recommend rechecking and monitoring the government website and other sources, for further insights or updates of the indicators proposed in the report.

# Discussion

## Next Steps

Once the BCNPHA receives our report, they can choose to implement our framework and criteria for ongoing assessment of the 30-Point Plan. Furthermore, they can disseminate the framework to BCNPHA staffers, associates, and other organizations which could benefit from the report.

We would recommend a periodic update of the indicators in our report, which considers new information, updates, points with longer implementation periods, and developing outcomes. This could be achieved through ongoing monitoring, or annual research updates.

To go deeper with this rubric, we would recommend that another research group go more in-depth with the evaluation of each point. This would entail doing thorough analysis on the metrics, uncovering metrics when possible through research and requests for information, and interviewing representatives as well as experts in the field for the assessment and critique of metrics.

## Conclusion

The B.C. Government's 30-point plan for housing affordability establishes 30 goals to address a number of issues across the housing spectrum: targeting areas ranging from homelessness, rental housing, speculation, and ownership.

This report is meant to benefit the British Columbia Non-Profit Housing Association (BCNPHA) in monitoring the progress of the 30-Point Plan. It presents a summary and report card as heuristic models for the quick reference of policies, actions, and outcomes, and to lay the groundwork for further evaluation. Our findings also comprise a critique of each point, which prompts for the examination of shortcomings in the 30-Point Plan. This framework and report card can be easily updated as the plan's implementation continues, as new metrics are discovered, and as more in-depth research is conducted.

We aim for this report to be a useful tool for the BCNPHA and other actors to reference and evaluate the policies and actions being implemented provincially regarding housing and affordability. Hopefully, this report lays the groundwork for ongoing assessment of a critical housing program with many variables and timelines that require consistent check-ins.

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