CITY OF COURTENAY AFFORDABLE HOUSING STRATEGY OPTIONS STUDY

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INTRODUCTION

Residents of Courtenay are navigating a housing system that is not meeting the needs of many, especially those who are already the most vulnerable. Singles, those on fixed-incomes, lone-parent families, and low-to-moderate income households, are finding that shelter costs are becoming more expensive and affordable options less available. The population is also aging, and older residents are having to make decisions about living situations that are both affordable and enable them to access the amenities they need. All of this is compounded by Courtenay's sustainability goals that necessitate change from high-emission, low-density housing to more connected, denser neighbourhoods.

The effects of a challenging housing system are far-reaching. High housing costs and instability are linked to negative health outcomes, economic instability, and a general decrease in quality of life for community members. In Courtenay, many residents who hoped to settle are leaving for cheaper, more diverse housing markets or are living further away from amenities and paying more for transportations. Employers across all industries are struggling to find and retain employees. The 2020 Comox Valley Housing Needs Assessment indicates that more residents than ever are at risk of homelessness or already in an unsustainable housing situation.

Housing may be even more complicated ten or twenty years from now as household sizes continue to decline and housing preferences shift. The 2022 draft Courtenay OCP sets a goal of net-zero emissions by 2050 which will necessitate thoughtful, strategic and efficient use of land and housing resources. To meet emissions goals, protect public infrastructure and promote social equity, new housing efforts will have to be innovative, flexible and responsive to changing circumstances.

This Study outlines tools to address identified challenges and gaps and provides a framework for the City to work with other levels of government, the private sector, and non-profit organizations to facilitate the development of affordable housing.

WHAT IS AN AFFORDABLE HOUSING STRATEGY OPTIONS STUDY?

Building on the 2020 Comox Housing Needs Assessment which identified housing challenges, gaps in availability across the spectrum and housing assets, this Study of strategy options outlines tools to address these issues while staying true to the vision of the 2022 Official Community Plan (OCP) update. Courtenay's Affordable Housing Strategy Study provides a set of options for the City to use when considering how to work with other levels of government, the private sector, and non-profit organizations to facilitate the development of affordable housing. The Study also directs the City to establish policies and regulations that will help staff and decision-makers effectively respond to development proposals, such as for inclusion in the new OCP.

WHAT IS AFFORDABLE HOUSING?

There are many definitions of what's considered affordable housing and many of us have some familiarity with various terms but understanding these various metrics and definitions is critical – these definitions have real impacts on rents that tenants are asked to pay.

In Canada, housing is considered "affordable" if it costs less than 30% of a household's before-tax income. This is the affordability component of the definition of core housing need. It is important to note that there are other indirect costs relating to housing, including transportation, which affect housing affordability, however, are not included in the affordability calculation.

While the 30% figure is useful, it is not a perfect definition of affordability and does not necessarily help local governments encourage or preserve units at an affordable rate. A key component of Courtenay's affordable housing strategy will be to define affordability in a way that links it to incomes, rather than fluctuations in the market, and is secured, meaning it is protected in the long-term.

This Study uses rents set at income limits to define a minimum level of affordability to be eligible for incentives and extends incentives to housing meeting the following definitions:

Deep subsidy is housing offered at income assistance levels (set by the Province) and/or on a rent-geared-to-income (RGI) standard of 30% of a household's income.

Supportive housing is housing that provides on-site supports and services to residents who cannot live independently.

Transition houses, including safe homes, provide temporary housing for women and children fleeing violence, offer a safe, anonymous place to stay with food, staff, and services. Second-stage housing for women and children fleeing violence who have completed a stay in a transition house of safe home, is included in this definition.

Emergency shelter is immediate, short-stay housing for people who are homeless or at risk of becoming homeless.

HOUSING SPECTRUM OR WHEELHOUSE

Throughout this report, housing needs are often categorized by tenure, or the financial arrangements under which an individual or group of individuals in a partnership has the right to live in their home. The most common types of tenure are rental and ownership, but there are many financial relationships that individuals can have with their home. These relationships are often organized along *the housing continuum* or *spectrum*. Used around the world, the model typically displays housing as a linear progression from homelessness or housing need to homeownership.

THE HOUSING CONTINUUM



Source: Canada Mortgage and Housing Corporation, 2018

While a useful tool for visualizing the many available housing options, communities are experimenting with alternative housing frameworks that can account for different cultures, lifestyles, and economic realities. The traditional housing continuum model presupposes that people will start somewhere on the axis and then move from left-to-right, with homeownership as the ultimate goal and marker of "success". For a variety of reasons many families and individuals may not choose homeownership as their goal or be unable to attain it in their chosen market. If an economic hardship hits your family and you need to move from ownership to rental, you have not failed, your needs have changed. Similarly, if you choose to rent rather than own so you can live closer to work, you are no less successful. The housing continuum promotes a false narrative that moving from left to right, towards a market-oriented relationship to housing is the correct way to navigate the housing system.



Source: The Housing Wheelhouse, City of Kelowna (2017)

The Housing Wheelhouse, developed as part of Kelowna's 2017 Housing Needs Assessment, consciously repositions homeownership from the end of the spectrum to one of three equal outcomes. The goal of the shift was to encourage decision-makers, housing providers, developers and residents to understand that all tenures of housing are vital components to creating and maintaining a healthy, sustainable and adaptable housing system. No one level of housing is greater or more important than another.

"By de-emphasizing homeownership in favour of a more diverse and evolving approach, the **Wheelhouse** allows the City to respond more efficiently and effectively to people's changing needs by adapting the programs and strategies."

Canada Mortgage and Housing Corporation (2019)

The Wheelhouse is one tool for the City of Courtenay and its partners to collectively envision and build a housing system that includes all forms of housing, rather than focusing solely on homeownership.

HOUSING NEEDS ASSESSMENT KEY FINDINGS

The 2020 Comox Valley Housing Needs Assessment responds directly to new Provincial requirements for local government housing reporting and data collection. This study is the primary source for housing information in the Valley and was released as a regional study with local appendices. Unless otherwise stated, all housing statistics appearing in this Courtenay-specific Study come directly from the 2020 Housing Needs Assessment which draws primarily on the 2016 Census, 2019 BC Assessment data, 2019 Real Estate data, and 2019/20 Short Term Rental Data.

Key assessment findings included:

1. Courtenay's population is aging.

The population of seniors (age 65 years and older) in Comox Valley grew 58.2% over from 2006 to 2016. This increased their share of the total population from 18.1% to 25.2%, highlighting a need for affordable, accessible, and connected housing for those on a fixed-income, particularly in the rental market.

2. The private market is not able to provide housing for a significant proportion of the Comox Valley.

Across the region, 10.3% of households and nearly 30% of renter households are in Core Housing Need. Only couples or couples with children can reasonably expect to own a single-detached home. Lone parent and non-economic households (for example, roommates or individuals living alone) struggle to rent or own more affordable housing options, and the stock of those options is limited. A households earning the median income would not be able to purchase a detached house, the most common housing type in the Region. This highlights a need for more affordable and non-market housing options.

3. There is a Need for More Subsidized, Supportive and Emergency Housing

As of January 2020, the BC Housing wait list for subsidised units had 270 applications; 73 families, 82 residents with disabilities, 74 seniors, 12 persons requiring wheelchair modified housing, 25 singles, and 1 rent supplement applicant. As of 2018, 117 people identified as experiencing homelessness, 58 percent of whom were unsheltered. These numbers likely underrepresent need as those who are in "hidden homeless" situations (couch surfing, living in campers, boats and other vehicles) are often hard to identify. Through representing a small portion of Courtenay's population, deep subsidy, supportive and emergency options are key to alleviating housing issues.

4. Limited Rental Availability

There is generally a lack of rental availability in Courtenay and across the Comox Valley. Renter households also earn significantly less income than owner households and renters are 6 times more likely to experience Extreme Core Housing Need than owners in the Comox Valley.

The increased percentage of renters and frequency of Core Housing Need points to a greater demand for dedicated rental housing options that are affordable, accessible and appropriate for the community. Renters tend to make up a disproportionately large amount of the workforce in key Comox Valley employment sectors including retail and construction. Engagement revealed that employers are finding it more and more difficult to find workers for positions in those and other industries. Improving housing options for renters may alleviate concerns from employers, and will increase the amount money renters have for other expenses.

5. Interest in Alternative Housing Models

One of the most encouraging themes catalogued in the Assessment was the strong public desire to pursue alternative tenure types and forms of housing. People understood that encouraging denser development or more rental housing could improve housing availability but did not trust market housing to provide a long-term solution to the housing crisis. Many people brought up cooperative housing models, land trusts, and even housing authorities as potential methods of improving availability, affordability, and stabilizing the market.

The Housing Needs Assessment strongly suggests that government intervention and support should be targeted at specific population groups, including:

- Seniors;
- Low to moderate income earners;
- Those at risk of homelessness:
- Single-income households; and
- Equity-priority groups

Though these findings paint a concerning picture of housing in Courtenay, the assessment also catalogues unique assets and strengths in the Comox Valley, highlighting the engaged and collaborative local governments and the remarkably strong non-profit housing and social service environment. Recommendations included in the study leverage identified assets wherever possible.

CITY OF COURTENAY OCP 2022

The vision for Courtenay's OCP 2022 understands that Courtenay is responsible for the future, for high quality of life for all, and to ensure that actions deliver on multiple directions of Reconciliation, Climate Action, Equity and Community Well-being, in a time of change.

Courtenay is responsible for the future, supporting high quality of life, with a low-carbon footprint for all.

The OCP also espouses a strong vision of addressing the climate crisis head-on, while also preparing for its impact. The vision expands to include a goal of reaching net zero emission by 2050 and protecting the natural spaces and life sources we love and upon which our lives depend.

Nine goals are identified, including understanding land as a precious resource, ensuring housing choices for all, strong neighbourhoods, functional transportation choices, a city for everyone, and investing in relationships.

The Affordable Housing Strategy (AHS) Options Study builds upon this vision and these goals, most directly goal 2. Housing Choices for All. The OCP identified the need for more housing for singles, larger rental housing for families, seniors supported housing, social and emergency housing, housing for multiple generations under one roof or on one property, and housing that accommodates a variety of cultural preferences. The AHS Study aligns with the larger OCP vision as well as with the goal of enabling housing choices so that residents don't have to move if their lives change.

THE WEIGHTED WHEELHOUSE: DEFINING INTERVENTION PRIORITIES

Based on the findings of the 2020 Housing Needs Assessment and the vision of the 2022 OCP update, the Weighted Wheelhouse is a tool the City of Courtenay can use to define intervention priorities moving forward.

As represented in Figure 1, the vast majority of Courtenay residents (83%) are accessing housing through homeownership and market rental. Renter households make up approximately 30% of total households, of which 11.9% are subsidized¹ (approximately 4% of total households) and 35% are in core housing need² (approximately 9% of all households). Additionally, 5% of owner households are in core housing need³ (4% of all households).

It is important to remember that engagement data suggests that many Courtenay residents are underrepresented in household statistics, especially those in tenuous housing conditions, experiencing homelessness, or living with friends and family. The number of individuals not able to meet their needs in the current market is likely substantially higher than could be represented through housing needs data.

¹ Comox Valley Regional District. 2020 Regional Housing Needs Assessment. Appendix A, Courtenay Report. 271.

² Ibid., 279.

³ Ibid., 279.

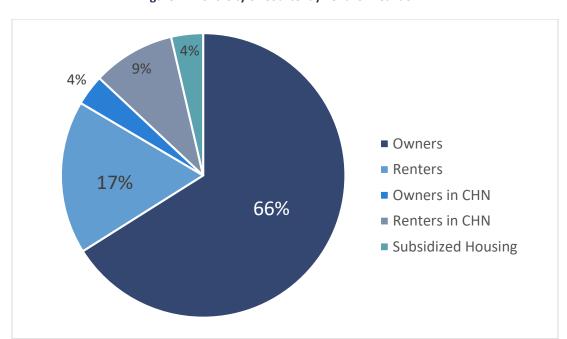


Figure 1 - 2016 City of Courtenay Tenure Breakdown

Those inadequately served by the market require more significant support and intervention from all levels of government as compared to other segments. In Figure 2 the "Weighted Wheelhouse" indicates where the City of Courtenay can both target its support and interventions, lobby other governments for further funding, and prioritize partnerships with non-profits that serve these sectors. More people may be in market ownership or rental tenures, but a social equity approach to housing requires interventions be targeted at those who need the most support.

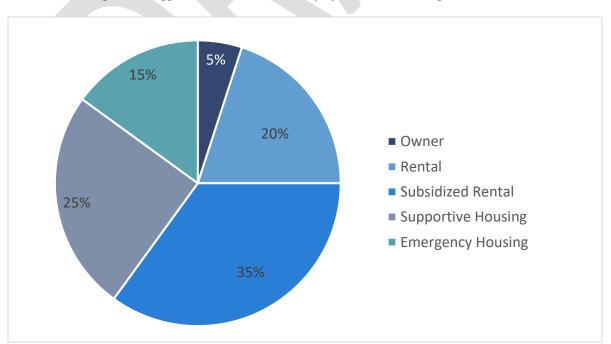


Figure 2 - Suggested Intervention Priority by Tenure: The "Weighted Wheelhouse"

In the Weighted Wheelhouse, government intervention and support are focused on the non-market and affordable market sections, including subsidized rental, supportive housing, and rental housing options. Emergency housing forms an important space for intervention but is relatively contained in terms of number of people accessing emergency housing. Ownership housing requires the least amount of intervention, as the majority of owners are capable of meeting their needs without support.

When reviewing the actions listed and implementation priorities, these can be filtered against the Weighted Intervention Wheelhouse to ensure that the City is taking effective action in the segments of the housing wheelhouse that most require support.

LIMITATIONS AND ASSUMPTIONS

There are a number of limitations to this Study. It is not a comprehensive plan nor a zoning bylaw review. The Study is a standalone document from the 2022 Official Community Plan (OCP), yet both builds upon the OCP goals and informs the OCP's direction. As such, it takes an evidence-based approach and focuses on identifying tools to address the most vital housing issues in Courtenay. The tools and actions are based on best practices from other jurisdictions, affordable research, practical knowledge from on-the-ground experience, and based on the findings from the Housing Needs Assessment.

COURTENAY AFFORDABLE HOUSING STRATEGY OPTIONS

VISION

The vision for this Study is informed by the vision for the 2022 OCP update, especially goals 1 and 2, and the Equity cardinal direction.

Goal 1: Land in Courtenay will be treated as the precious resource that it is, with all future growth being focused within the city's existing footprint, and where residents can go about much of their daily lives with a reduced carbon footprint.

Goal 2: Courtenay will enable housing choices in all neighbourhoods of the city in which all residents have access to homes that are affordable, healthy, green, and appropriate for diverse needs, life stages and aspirations.

Equity Cardinal Direction: Cities are home to people from all walks of life. Yet the ways that cities have been traditionally planned have not considered the needs and experiences of all people. The OCP challenges some traditional planning practices that can result in policies, programs, and regulations that disproportionately impact and stymie the progress of some equity-priority groups. Through polices on topics ranging from affordable housing to public participation, this OCP applies an equity lens and seeks to honour the lived experiences of all of Courtenay's peoples.

GOALS

To meet the vision while addressing specific shortfalls identified in the Housing Needs Assessment, the following policy goals inform objectives and possible actions throughout the Courtenay Affordable Housing Strategy Options Study.

Build on Past Successes and Current Assets

Through leadership and good practice, the City of Courtenay has already responded effectively to some of the housing challenges facing residents. There are also unique assets and strengths in the City including engaged and collaborative regional atmosphere and the remarkably strong non-profit housing and social service environment. Continued leadership supporting innovation and collaboration in an essential role for the City of Courtenay.

Prioritize Intervention Based on the "Weighted Wheelhouse"

Municipalities have competing interests for limited funds, resources, and staff capacity. When resources are limited, the City should prioritize its efforts based on the Weighted Wheelhouse, even when politically unpopular. Using the Weighted Wheelhouse as a guide will, help staff justify particular interventions over others and reinforce the principles of social equity included in the OCP vision.

Focus on Low to Moderate Income Households

While the Weighted Wheelhouse focuses on tenure, further priority can be placed on interventions that impact specific populations. As rental and ownership costs increase, there is a need to support households making the median income or less, especially single-income households, and those relying in income assistance.

Encourage Diverse Housing Options and Choice in All Neighbourhoods

The population of Courtenay is growing and household sizes are decreasing. At the same time, Courtenay is restricting the physical growth of the City to the current footprint. These are not necessarily competing interested, but will necessitate the development of a variety of denser housing forms and tenures in all areas of the City. This includes development of housing that is suitable for aging residents, families, individuals, and persons with mobility limitations.

Minimize Uncertainty

To support the efforts of the market and non-market development communities the City of Courtenay can minimize some of uncertainty in the development process by clarifying incentive policies and contribution requirements, providing guides around infill development, and even pre-zoning to encourage specific uses. Staff can also champion specific projects and be knowledge bases for under resourced non-profits, provided projects meet certain criteria.

Seek Opportunity and Leverage Innovation

Courtenay is an incredibly desirable community and many people with higher earning potentials are considering moving to the Valley or Courtenay because of the amenities and quality of life offered. At the same time, housing is one the most pressing issues and there is broad support for innovative action across the community and at all levels of government. The City should leverage its desirability into innovative housing action, either by securing larger community amenity contributions for affordable housing, acquiring new affordable units and land, or encouraging innovative housing options.

Build Trust and Community Support

Engaging with Courtenay residents about affordable, supported, and non-market housing is critical for the success of those and other housing projects. The City can provide clarity about policy and bylaw updates and link projects directly to OCP visions and goals through creative and early education and engagement.

POLICY OBJECTIVES

Based on the findings of the 2020 Comox Valley Housing Needs Assessment, a preliminary list of housing issue areas, policy ideas and considerations were identified. The policy options are grouped under five categories, presented here as policy objectives:

- 1. Promote and protect rental housing;
- Support non-market and secured affordable housing options;
- 3. Align land use and affordability goals;
- 4. Expand and deepen partnerships; and,
- 5. Educate citizens and advocate to senior levels of government; improve institutional capacity.

This Study has identified potential actions available to the City of Courtenay. Action options are assigned to one policy objective, though an action may support multiple objectives. Action options range from adjustments to existing regulations or policies to major new initiatives that will require bold leadership, commitment, and multi-sectoral partnership. Once actions are decided upon, it will take several years for the full effects of many of the actions to be felt.

When developing an Affordable Housing Strategy, each action option will be accompanied by a corresponding relevance and impact assessment and timeframe for implementation.

RELEVANCE AND IMPACT:

Each municipal action will be assessed in terms of its relevance to meeting needs and gaps identified in the HNA and/or its ability to further the goals identified in the draft 2022 OCP. As indicated above, the OCP is forward looking, directed by Reconciliation, Climate Action, Equity, and Community Well-being. Nine goals are identified in the OCP and each action option will be assessed against its relevance and ability to further these goals, most notably goal 2 – Housing Choices for All, as well as whether it is addressing a specific gap identified in the HNA. Each action will be assigned either **High**, **Medium**, or **Low** relevance/impact.

While each of the five policy objectives have been chosen for their ability to respond to the Weighted Wheelhouse (itself based on the findings of the HNA), some actions will have less immediate direct impact on, for example, providing new larger rental housing stock for families and other priorities identified in the HNA and OCP. These actions are still important areas where the City can have a longer-term, potentially indirect impact by creating the environment for ensuring housing choices are available for all. The relevance and impact criteria will focus the City's efforts on the most relevant actions, while the following will provide direction on the timeframe for each action.

TIMELINE:

The following timeline categories take into consideration staff capacity, financial resources, bylaw updates, and funding opportunities:

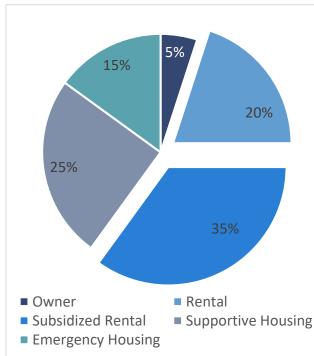
Ongoing: Certain municipal actions will require regular updates, monitoring, and actions to be considered effective.

Short Term: 1-2 years: Short term municipal actions are can be completed in the first two years upon implementation of an Affordable Housing Strategy or policy, including policy adopted within the OCP. These municipal actions can be classified as "quick wins". They require a limited amount of resources and don't necessarily require dedicated personnel to create changes with potentially high impacts. The completion of these actions can lead to the initiation of projects with longer timelines.

Medium Term: 3-5 Years: These projects are prioritized to be initiated or completed within 3-5 years of an Affordable Housing Strategy or policy, including policy adopted within the OCP. These items can rely on the completion of short-term projects to be initiated or completed.

Long Term: 5+ Year: Long term: Long term projects are initiated or completed 5 or more years after the implementation of an Affordable Housing Strategy or policy, including policy adopted within the OCP. These initiatives generally require dedicated personnel, are resource intensive, and dependent on the successful implantation of short- and medium-term municipal actions.

OBJECTIVE 1: PROMOTE AND PROTECT RENTAL HOUSING



Affordable market housing options, especially rental housing, are vital to the health of Courtenay's housing system. By encouraging development in the market, the City can facilitate rental housing solutions and increase affordable housing supply in a way that responds to a range of challenges.

Most residents of the City of Courtenay find their housing through market options, or housing that is available at a price set by private sellers. Either as a long-term solution or as a steppingstone to eventual home ownership, the market, especially the rental market, has traditionally been affordable enough to meet the needs of most community members.

As the ownership market in Courtenay becomes

more difficult to enter, the rental market is expected grow in importance. In 2019, purchase prices for all dwelling types averaged 50% higher than they were from 2010 to 2016.⁴ Adjusting for inflation, a median single-detached home that cost \$287,000 would cost \$487,000 in 2019⁵. An affordability analysis conducted in 2020 shows that only households earning substantially more than the median income can afford to purchase a detached home in Courtenay.⁶ Without enough supply, growing demand can result in increased competition for rental units, driving prices up and pushing out those least able to afford the increases.

Rates of rentership and core housing need are up, ownership prices are less attainable, and less people are able to meet their needs through the current housing market. Despite a recent influx of new primary rental market units, a lack of affordable, attainable rental units remains the clearest and pressing need in Courtenay. Policies in this section focus on increasing the number and availability of new affordable market rental units and protecting existing stock.

⁴ Ibid., 267.

⁵ Ibid., 267.

⁶ Ibid., 283.

POTENTIAL POLICY DIRECTIONS AND ACTIONS:

POLICY DIRECTION 1.1: PROTECT EXISTING RENTAL STOCK

Protecting existing stock is just as important as adding rental housing to the market. Many of the most affordable options in Courtenay are older and may be at risk of revitalization as the population grows, preferences change and land use regulations permit denser options. These actions can help protect existing rental units by giving the City tools to preserve rental designations.

Actions:

- 1.1.1 Update the City's strata conversion policy (included in 2007 Affordable Housing Policy) to limit or prevent the conversion of existing occupied multi-residential buildings from rental until the vacancy rate (according to CMHC) exceeds 3% for a period of at least 12 months.
- 1.1.2 Consider developing a Standards of Maintenance Bylaw to ensure long-term upkeep of existing rental and co-op stock, where applicable.
- 1.1.3 Consider pre-zoning to a rental-only zone for existing aging rental stock.

POLICY DIRECTION 1.2: ENSURE NO NET LOSS OF AFFORDABLE RENTAL STOCK THROUGH REVITALIZATION

A "no net loss" policy can ensure any revitalization of older rental stock either replaces or increases the number of available units. This is especially important as Courtenay grows without increasing its physical boundaries.

- 1.2.1 When properties with existing purpose-built rental, co-op and mobile home units are redeveloped or revitalized, require:
 - An assessment of existing on-site units, including servicing levels;
 - A meeting with city staff to discuss alternatives to demolition;
 - A plan to replace existing on-site units with similar units in the new development;
 - A plan to replicate affordability conditions offered by the existing site, or to meet affordability thresholds defined through further policy development.

POLICY DIRECTION 1.3: REQUIRE RELOCATION PLANS WHEN PROPERTIES WITH EXISTING RENTAL, CO-OP AND MOBILE HOME UNITS ARE REDEVELOED OR REVITALIZED

Relocation and assistance plans help protect existing affordable rental stock and ensure any revitalization of older rental stock does not reduce the number of available units. This is especially important as Courtenay grows without increasing its physical boundaries.

ACTIONS

- 1.3.1 Require Relocation and Assistance Plans when properties are with existing purpose-built rental, co-op and mobile home units are redeveloped or revitalized. Relocation and Assistance Plans should feature:
 - An assessment of existing on-site rental;
 - Proposed options for relocating and assisting existing tenants;
 - Relocation plan for tenants during and after redevelopment;
 - Proposed financial assistance options for tenant relocation; and

- Strategy for managing communications and relations between a developer and existing renters.
- 1.3.2 Consider mandating "right of first return" where displaced tenants are given the opportunity to return to a unit in the revitalized property once complete.

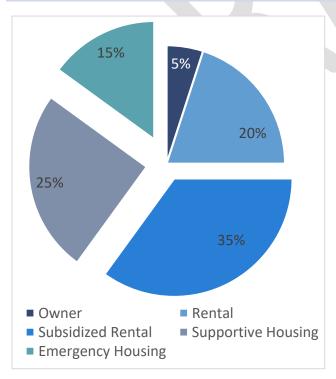
POLICY DIRECTION 1.4: REGULATE SHORT-TERM RENTALS

AirBnb, VRBO, and other short-term rental services have the potential to impact availability of rental housing. These actions are designed to minimize the impact of short-term rentals and help City staff track how many properties are active within City boundaries.

Actions:

- 1.4.1 Require all short-term rental operators to obtain a business licence and to display their business licence number in all listings. Business licence proceeds can be directed to the Affordable Housing Amenity Reserve Fund (AHARF).
- 1.4.2 Determine an appropriate fine for listing a short-term rental without a valid licence. Fine proceeds can be directed to the AHARF.
- 1.4.3 Create a short guide on requirements for short-term rental operators in Courtenay.
- 1.4.4 Consider restricting short-term rentals to dwelling units where the owner is currently residing on the property, either in the primary or secondary dwelling.

OBJECTIVE 2: SUPPORT NON-MARKET AND SECURED AFFORDABLE HOUSING OPTIONS



As the Comox Valley Housing Needs Assessment shows, there is tremendous need for non-market and secured affordable housing with and without supportive elements. The people who are in the greatest need are the ones receiving the least support and who have the least options available to them. As per the weighted wheelhouse, this is where the City should focus its efforts. Actions in this section can help the City and its non-profit development community begin the process of meeting that need.

POLICY DIRECTIONS AND ACTIONS:

POLICY DIRECTION 2.1: EXPAND AND INCENTIVIZE NON-MARKET HOUSING OPTIONS

This policy direction would reconfirm the City's commitment the non-market housing sector by incentivizing and prioritizing construction and redevelopment projects with affordability compositions that meet strict requirements.

The City of Courtenay can facilitate the development of below-market rental housing options by developing a tiered incentive policy that encourages developers to build more affordable rental options. Depending on the level of (secured) affordability offered in a particular project, the developer could be eligible for more incentives.

ACTIONS

- 2.1.1 Develop a package of incentives to encourage that a minimum of 15% of units within new developments be secured long-term below-market rental units. Incentives may include density bonuses, waiving of community amenity contribution negotiation expectations, parking relaxations, and reduction in application fees, subject to negotiation with city staff and to appropriate servicing, parking, traffic, building height/massing review. Include deeper incentives for non-market developments where at least 50% percent of new units are secured through legal agreement at below market rents for a period of at least 20 years.
- 2.1.2 Mixed-use projects are eligible for incentives outlined in 2.1.1 if they meet the residential unit criteria and the non-residential component does not exceed 35% of total building size.
- 2.1.3 Consider using BC Housing's Housing Income Limits (HILs) or Limits on Gross Achievable Residential Income to set eligibility conditions for market developments accessing "below-market rent" incentives outlined in Action 2.1.1.

HILs are set annually by BC Housing to represent affordable rent levels for low to moderate income families.

Housing Income Limits, Courtenay-Comox (2019)				
Unit Type	Housing Income Limit (2019)	Income Available for Shelter (30% of HIL)	Maximum Monthly Rent (Income Available for Shelter/12 Months)	
1 Bedroom or Less	\$32,500	\$9750	\$812	
2 Bedroom	\$39,500	\$11,850	\$987	
3 Bedroom	\$48,000	\$14,400	\$1200	
4+ Bedroom	\$62,500	\$18,750	\$1562	

Limits on Gross Achievable Residential Income are set on an individual property basis and require annual submission of independent appraisal report, the cost of which is borne by the property owner. The owner must show that the total residential rental income of the project is at least 10% below its gross achievable residential income. Limits on Gross Achievable Residential Income is a market-based approach and may not be suitable in an environment where rental costs are rising and incomes are not.

2.1.4 Preference is given to the creation of new non-market affordable housing units within proposed developments, however, developers may access incentive packages in action 2.1.1 in exchange for significant Community Amenity Contributions that must include land or a contribution to the affordable

- housing amenity reserve fund. Contributions must exceed Community Amenity Contribution requirements.
- 2.1.5 Legal agreements placed on title (Section 219 Covenant or housing agreement) to secure affordability can be waived when Provincial and Federal agencies have stringent covenant requirements as a condition for funding approval.
- 2.1.6 The City shall seek to waive fees (property taxes, Development Cost Charges, all application and permit fees) when possible for developments demonstrating commitment to deep affordability (e.g. units available at the Shelter Component of Income Assistance rate or rent-geared-to-income) and/or supportive, transition, and emergency housing (see definitions in Introduction section above).
- 2.1.7 For projects not directly meeting eligibility conditions set in Action 2.1.3, consider using a variation of BC Housing's Housing Income Limits (HILs) to set supplemental eligibility conditions for developments accessing non-market incentives. HILs are set annually by BC Housing to represent affordable rent levels for low to moderate income families. Seventy percent (70%) of HILs is routinely used by government programs as a metric to evaluate affordability for those of lower incomes. This represents an additional depth of affordability consistent with the goals of Action 2.1.1.

70% Housing Income Limits, Courtenay-Comox (2019)				
Unit Type	70% of Housing Income Limit (2019)	Income Available for Shelter (30% of HIL)	Maximum Monthly Rent (Income Available for Shelter/12 Months)	
1 Bedroom or Less	\$22,750	\$6825	\$569	
2 Bedroom	\$27,650	\$8295	\$691	
3 Bedroom	\$33,600	\$10,080	\$840	
4+ Bedroom	\$43,750	\$13,125	\$1094	

- 2.1.8 Mixed-use projects are eligible for incentives outlined in 2.1.1 if they meet the residential unit criteria and the non-residential component does not exceed 35% of total building.
- 2.1.9 Legal agreements placed on title (Section 219 Covenant or housing agreement) to secure affordability on can be waived when Provincial and Federal agencies have stringent covenant requirements as a condition for funding approval.
- 2.1.10 Direct staff to prioritize development-related applications that meet 2.1.1. Application goes to the "top of the pile" and will be processed within a targeted and expedited timeline of receipt based on staff capacity.
- 2.1.11 Waive any requirements that are already met by the project (housing agreement, public information meeting, etc.)
- 2.1.12 Consider waiving some of the requirements outlined in Policy Directions 1.2 and 1.3 provided the development considers the needs of current tenants and has a strategy to relocate or rehouse them during and after construction.

POLICY DIRECTION 2.2: UPDATE COMMUNITY AMENITY CONTRIBUTION FORMULA AND REDIRECT PERCENTAGE OF FUNDS TO THE "AFFORDABLE HOUSING AMENITY RESERVE FUND" (AHARF)

The Affordable Housing Amenity Reserve Fund (AHARF) is an important tool for City. It can be used to leverage market development to secure assets or contributions that can help the Courtenay meet non-market or affordability goals. By updating the Community Amenity Contribution formula to increase the

amount of revenues collected through the AHARF, the City can give itself a flexible reserve from which to draw for a variety of projects.

- 2.2.1 Update the Community Amenity Contribution Formula based on land economics and market analysis.
- 2.2.2 Conduct public consultation with development community and non-profit housing providers on proposed project eligibility and contribution amounts.
- 2.2.3 Create a structure to direct revenues, with the goal of generating the maximum number and variety of affordable units that meet affordability criteria listed in above actions, including:
 - Units secured at Housing Income Limits (HILs)
 - Units secured at 70% of HILs
 - Units secured at deep subsidy or Rent Geared to Income levels
 - Supportive, transition, and emergency housing units
- 2.2.4 In addition to maximizing units, consider using AHARF funds to help meet goals of Land Acquisition and Disposal Strategy (2.2).
- 2.2.5 Consider yearly municipal contributions to AHARF. Direct short-term rental business license and non-compliance fine proceeds to AHARF.
- 2.2.6 Partner with other levels of government and non-profit community to ensure greatest funding impact.

POLICY DIRECTION 2.3: DEVELOP LAND ACQUISITION AND DISPOSAL PLAN PRIORITIZING DISPOSAL OF LANDS FOR NON-MARKET HOUSING

The City of Courtenay can play a major role in facilitating affordable housing by acquiring properties for future development, either by the City or through disposal to an organization that has demonstrated a commitment to the affordability goals of the City. This plan would provide clarity in the approach to land acquisition and would enable the City to take advantage of available properties as they arise.

- 2.3.1 Develop criteria to help staff assess acquisition options and opportunities, including lot size, cost, location, zoning, proximity to transit, parks and other amenities, and any key site factors (servicing, environmental concerns, etc.).
- 2.3.2 Using criteria developed in Action 2.3.1, identify key un/underdeveloped sites for City acquisition. Prioritize land acquisition for affordable housing, specifically sites suitable for multi-residential development.
- 2.3.3 Identify funding sources for land acquisition, such as the Affordable Housing Amenity Reserve Fund, estate gifts, borrowing, or other sources.
- 2.3.4 Identify disposal criteria based on affordability priorities, secured affordability, need, non-profit status, and funding viability and any prequalification processes conducted with non-profit operators or non-market developers.
- 2.3.5 Enable Council to acquire sites as they come available, knowing that these sites may only be leased or disposed of as and when non-profit operators, funding programs and opportunities arise.

- 2.3.6 Consider opportunities to co-locate municipal facilities and affordable housing where appropriate. Consider developing partnerships with non-profit housing providers to facilitate the development of new housing as part of municipal halls, community centres, fire halls, libraries or other civic facilities.
- 2.3.7 Consider prequalifying non-market developers and/or non-profits for land disposal and/or lease using Reguest For Qualifications and Standing Offer.
- 2.3.8 Explore the potential for creating a municipal or regional housing corporation or housing organization that would be lead development and operations of future affordable housing. Should not be undertaken without significant consultation with existing non-profit sector.

POLICY DIRECTION 2.4: EXPAND SUPPORTIVE, SHELTER, AND EMERGENCY HOUSING SUPPORT OPTIONS

The City of Courtenay can expand supportive, emergency, and shelter housing options across the community by reviewing zoning permissions for these uses and continuing to fund important community organizations currently supporting Courtenay residents.

- 2.4.7 Include supportive, emergency shelter, and transitional housing as a permitted use in all residential/institutional zones in the City's Zoning bylaw
 - Ensure thoughtful site selection and design concept, as per Action 5.1.2.
 - Consider including specific parameters around what is allowed under supportive, emergency, and transitional housing use, such as maximum number of individuals/units, and separation distance from other supportive housing.
- 2.4.8 Consider the use of Municipal and Regional District Tax revenues (typically referred to as the Hotel Tax) to expand supportive, shelter, and emergency housing options. Though affordable housing is a permitted as a use of these funds, this must be balanced against tourism and marketing priorities.
- 2.4.9 Continue to support Homelessness Support Services (HSS). Consider increasing HSS requisition through community referendum process to meet need identified by Comox Valley Coalition to End Homelessness.

OBJECTIVE 3: ALIGN LAND USE AND AFFORDABILITY GOALS

Land use and affordable housing decisions are intrinsically linked. As Courtenay redefines its future through the 2022 Official Community Plan process, it needs to integrate and align all aspects of community planning including sustainability, transportation, zoning, service delivery, and growth management with affordability goals.

Sustainability and climate change mitigation and reduction has emerged as an important pillar of Courtenay's future land use goals. A key tool for meeting that goal will be constraining urban growth and encouraging densification across key growth nodes in the city. Actions in this section encourage gentle densification and zoning solutions that can expand affordability while addressing sustainable growth.

POLICY DIRECTION 3.1: ENCOURAGE INFILL AND INTENSIFICATION IN RESIDENTIAL ZONES

To diversify the number and type of housing options available in traditionally low-density areas, the City can support development of a variety of infill accessory options that increase density while maintaining form and character.

Actions:

- 3.1.1 When revising zoning bylaw through OCP update process, consider allowing up to three units to be built on standard residential lots (less than 750m²) and up to four units on larger lots (greater than 750m²) and higher densities for assemblies of 2 or 3 lots, subject to appropriate servicing and parking.
 - For lots less than 750m², this may include a triplex, duplex with a coach house, or principal dwelling with a secondary suite and coach house.
 - For lots greater than 750m², this could include up to four units in creative configurations, such as courtyard housing, a fourplex, or a triplex with a coach house.
- 3.1.2 Encourage additional residential density in identified growth nodes by permitting lock-off, secondary and micro-suites, subject to appropriate servicing, parking, traffic, and building height/massing review.
- 3.1.3 Reduce parking requirements for projects located within growth nodes and for infill housing forms. Explore alternative solutions to reduce parking requirements, including promoting car share, bicycle storage rooms in multi-residential developments, and encouraging development co-located with transit.
- 3.1.4 Consider reducing minimum lot sizes in residential zones to increase densification of existing and future lots.
- 3.1.5 When existing residential lots are consolidated and existing structures demolished, consider requiring maximum lot size to prevent large single-detached housing in growth nodes.

POLICY DIRECTION 3.2: EXPAND ZONING OPTIONS

By expanding zoning tools and permitting denser options in more zones the City of Courtenay can add rental and ownership options without increasing its physical footprint.

Actions:

3.2.1 Allow row house, townhouse, duplexes and other denser, multi-residential options in single detached residential zones (R-1, R-1A, R-1B. R-1C, R-1D) subject to appropriate servicing, parking, traffic, building height/massing review.

- 3.2.2 Consider allowing Comprehensive Development zoning options for projects meeting 2.1.1, when appropriate, to achieve proposed land use goals that are in line with OCP goals but aren't offered within existing zones.
- 3.2.3 Consider changing existing zoning or create new zoning that can accommodate cluster housing, co-ops or tiny homes, where servicing and transportation allows.
- 3.2.4 Consider granting renewable, temporary use permits to regulate tiny homes on underutilized land.

POLICY DIRECTION 3.3: ALIGN ALL ASPECTS OF CITY PLANNING

Housing policy is inextricably linked with transportation, servicing and other areas of city planning. Though broad, the actions in this section can inform how the OCP, area plans, and other regulatory documents can interact with affordable housing.

- 3.3.1 Align bike lane implementation, public transportation, and sidewalk connectivity improvements to reduce dependent on vehicle ownership.
- 3.3.2 Expand bike lanes, sidewalk connectivity, and linear trail systems to connect with growth zones.
- 3.3.3 Review servicing requirements and ability of neighbourhoods to support greater density.
- 3.3.4 Review costing of green waste pick up for multi-residential developments. Prioritize green waste pick up for multi-residential developments within the next five years.
- 3.3.5 Review servicing requirements for tiny homes, and potentially prioritize self-contained options (e.g. composting toilet/solar panels, etc.)

OBJECTIVE 4: EXPAND AND DEEPEN HOUSING PARTNERSHIPS

Partnerships across local, provincial and federal governments along with non-profit developers and service providers are key to addressing affordable housing in Courtenay.

Non-profit organizations are able and capable of filling housing service delivery gaps. Actors in this sector are some of the most important allies for local government, both in the provision of housing, but also to review and help administer education and advocacy campaigns that can make developing affordable housing easier. Courtenay has an incredibly strong non-profit sector, highlighted by the Comox Valley Coalition to End Homelessness, an umbrella organization addressing affordable housing and support services. Unfortunately, non-profit capacity and resources are limited, and that sector is routinely overworked. The community is looking to the City to play a key role in further supporting these groups to ensure that they are maximizing opportunities and meet housing needs.

There is also growing recognition that Courtenay's housing system functions within a larger, regional housing system. As the regional urban centre, many people who work in Courtenay may live in other communities in the Comox Valley or even Campbell River. While regional initiatives, including the recent Housing Needs Assessment, are under way, continued regional collaboration is key to improve long-term outcomes in Courtenay.

The actions in this section emphasize the importance of ongoing engagement with the provincial and federal governments to ensure that cities are empowered with the tools and resources to address the significant housing needs they face. They also encourage greater partnership with non-profit developers and housing service providers.

POLICY DIRECTION 4.1: SUPPORT NON-PROFIT SERVICE DELIVERY

The City has the resources and expertise to provide key assets to the non-profit community in Courtenay, who may be operating on smaller budgets and with less capacity. Actions in this policy direction encourage the City to continue or expand its contributions to the non-profit housing community and dedicate specific staff time to supporting non-profit housing development.

- 4.1.1 Continue to fund the Homelessness Support Services tax and expand this contribution, in collaboration with regional partners (CVRD, Village of Cumberland).
- 4.1.2 Assign a City staff person as an affordable housing "champion" and allocate staff hours to this work. This can include connecting non-profits with funding streams, land opportunities, or market developers. Staff "champion" can also serve as a dedicated single point of contact with Provincial and Federal housing entities (e.g. BC Housing and CMHC) to ensure consistency of communication, as well as with non-profit organizations and those seeking to develop secured affordable housing.

- 4.1.3 Investigate existing and future Provincial and Federal funding opportunities. When funding becomes available, ensure staff "champion" has capacity to support applications and understands the funding requirements.
- 4.1.4 Consider developing and executing a Memorandum of Understanding with Provincial and Federal partners to outline Courtenay's housing goals and aspirations and affirm commitment to work together to achieve these goals (e.g. Nanaimo MOU with BC Housing).

POLICY DIRECTION 4.2: EXPAND REGIONAL HOUSING INVOLVEMENT

Courtenay is the largest housing market in the Comox Valley. Actions in this section reaffirm Courtenay's commitment to regional housing action and partnership with other municipalities, electoral areas, and neighbouring Nations.

- 4.2.1 In recognition that housing needs in the CVRD are interconnected, explore partnerships with the Town of Comox, Village of Cumberland, and the Comox Valley Regional District to partner on housing projects that are beneficial to the region as a whole, with a focus on supportive housing.
- 4.2.2 Assign staff "champion" to seek to understand distinct housing challenges and opportunities of K'ómoks First Nation as well as the urban Indigenous population in Courtenay.
- 4.2.3 Explore partnerships with K'ómoks First Nations to collaborate on housing projects.
- 4.2.4 Work collaboratively within the region to update the Housing Needs Assessment every 5 years to reflect the current status of housing in the City. Time the next Housing Needs Assessment with the release of 2021 Census data (approximately Spring 2023).

OBJECTIVE 5: EDUCATE AND ADVOCATE; IMPROVE INSTITUTIONAL CAPACITY

Advocacy for more support and tools, improved staff ability, and a supportive affordable development environment can make affordable housing easier to build and more effective.

Advocacy and education within Courtenay and to other levels of government is an ongoing, and often unsung aspect of addressing affordable housing. Municipal tools are limited, and the Province and Federal government are primarily responsible for the provision of affordable housing. However, local government is routinely the best positioned to address housing need and the most aware of specific needs and service gaps. Through the mayor and council, and additional extra-governmental organizations Courtenay needs to advocate for expanded funding opportunities and support for improved local tools.

Local education is an important tool already available to municipalities. Many residents of Courtenay may not understand the need in their community and the value affordable housing can bring to their neighbourhoods, businesses, and lives. Because of this, affordable housing projects can be difficult to develop, especially in residential neighbourhoods. Local government plays a key role in building awareness of need and acceptance of new housing amongst its residents. Building on work already being done by the Comox Valley Coalition to End Homelessness, the City of Courtenay can continue to develop education materials and programs for residents that can have a meaningful effect on affordable housing development.

Internal education for city staff and mayor and council is perhaps the most important aspect of housing education. Both need continuing support to adapt to the changing realities of affordable housing development and community responses. By hiring or tasking a staff member to be a champion for affordable housing and integrating housing needs and equity impact assessment training into onboarding and routine education, Courtenay can ensure its already very capable staff become leaders across BC.

The actions in this section include internal and external affordable housing education, staffing commitments, and recommendations for advocacy positions at provincial levels.

POLICY DIRECTION 5.1: EDUCATE RESIDENTS ON THE VALUE OF AFFORDABLE HOUSING; WORK TO MINIMIZE CONFLICT

Through public outreach, leadership, and creations of new engagement opportunities, the City can help raise awareness of local housing issues and build support for affordable, supportive, and emergency shelter projects.

Actions:

5.1.1 Continue to educate residents on value of affordable and supportive housing options; expand on work done by Comox Valley Coalition to End Homelessness'(CVCEH) "Affordable Housing Benefits Everyone" campaign.

- 5.1.2 Work to encourage community acceptance of inclusive neighbourhoods by ensuring thoughtful site selection and attention to design detail to address neighbourhood concerns.⁷
 - Ensure ample opportunity for input in the design process by neighbors. Common concerns may be privacy, lighting, and design aspects that could negatively impact living environment.
 - Encourage developers to provide project renderings and offer design charettes with community stakeholders early in the process and throughout the design process to gather suggestions but without requiring proponents to follow recommendations.
 - Consider other similar developments in the neighbourhood/community, distance to amenities, etc. when selecting sites.
 - Encourage proponent organizations to employ different types of community and public engagement, from open houses and public hearing, to smaller-scale information provided on website and via handouts.
 - Consider creating a Citizens Advisory Committee at the design phase so that key stakeholders could actively engage and have input into the development and design process.
 - Requests for engagement in the design process need to be considerate of time any process
 that adds time to the approval process also adds a cost to the project (holding costs, taxes, etc.),
 which ultimately may impact affordability.
- 5.1.3 Encourage proponents to provide tours of existing developments to allow concerned residents to meet and hear from existing tenants if safe to do so. Proponent credentials are important in gaining community acceptance. The City should work with supportive and affordable housing providers that have good reputations in the community or encourage organizations to partner in a mentoring relationship with those that do.
- 5.1.4 Provide training and guidance to affordable and supportive housing providers in undertaking effective community engagement. Funders should provide training to proponent organizations who may have limited capacity or experience in community engagement. The City could work with the CVCEH to develop guidelines or a process for community engagement around affordable and supportive housing and lobby senior levels of government for funding for these activities.
- 5.1.5 Best practices for minimizing conflict between neighbouring developments include Good Neighbour Agreements (GNA), which are in place in several jurisdictions in Canada and the US. GNAs are in place to maintain open communications and be able to proactively respond to concerns before they become contentious. One of the functions of the GNA is set up a Project Advisory Committee that can provide space to regular feedback on the building operations, as well as providing an opportunity for tenants to engage with the wider community. The Project Advisory Committee can be seen as the operational extension of the Citizens Advisory Committee from the design phase.
- 5.1.6 The City can take a proactive position, given that the City has identified affordable housing as a top priority in the OCP and this Study. Enable City staff to explicitly support projects that are consistent with approved policies and plans.
- 5.1.7 The City could explore setting up a review panel to act as a tribunal and arbitration panel for contentious developments. The research did not find any other examples of a jurisdiction that has finalized this option, but it could be pursued if there is support from stakeholders in the community. The panel's mandate should be clearly defined as an advisory body that mediates in the event of disputes to encourage constructive discussion and resolution of issues. It would be an independent body that is used

⁷ Adapted from BC Housing Toolkit for Community Acceptance of Non-Market Housing 2019. Guide 2 Design Considerations to Gain Community Acceptance.

on a voluntary basis and its recommendations would not be binding but would offer advice to Council on next steps. The panel would be formed of independent, impartial, well-informed citizens⁸.

POLICY DIRECTION 5.2: PROVIDE EDUCATION FOR FIRST TIME LANDLORDS

As Courtenay develops more infill options, more homeowners are likely to become landlords for the first time. Providing training and education to make renting a more attractive option will mitigate conflict and increase number of units available.

Actions:

- 5.2.1 Provide resources on the City of Courtenay website and in person. Encourage landlords to take Residential Tenancy Act online course and pursue I Rent It Right certificate and/or Renting it Right course.
- 5.2.2 Consider hosting or subsidized annual course for new landlords in Courtenay through Renting It Right and I Rent It Right or other courses as appropriate.

POLICY DIRECTION 5.3: PROVIDE EDUCATION FOR NEW RENTERS

Similar supports should be encouraged for renters, especially those moving from supportive housing options into newly developed infill or rental options. Training facilitated in partnership with non-profits can help mitigate conflicts with landlords.

Actions:

- 5.3.1 Partner with the Comox Valley Coalition to End Homelessness to encourage new renters to take Ready to Rent course.
- 5.3.2 Consider hosting or subsidizing annual courses for new renters in Courtenay.

POLICY DIRECTION 5.4: ADVOCATE FOR INCREASED SUPPORT FROM SENIOR LEVELS OF GOVERNMENT

Senior levels of government provide key funding that helps non-profit developers build affordable housing in Courtenay. Through consistent advocacy, the City and its partners can expand the tools at their disposal and potentially attract more funding greater affordability.

Actions:

5.4.1 Advocate to senior levels of government: Work with other municipalities at the Union of BC Municipalities and Federation of Canadian Municipalities to develop consistent advocacy positions.

5.4.2 If planning tools from other jurisdictions have the potential to alleviate housing issues in Courtenay, advocate to senior levels of government for increased powers and greater municipal flexibility.

⁸ Adapted from Focus Consulting 2014. Finding Common Ground: Best Practices in Managing Resistance to Affordable Housing.

5.4.3 Advocate for further funding for affordable housing.

POLICY DIRECTION 5.5: EXPAND STAFF AWARENESS OF EQUITY-PRIORITY GROUPS IN COURTENAY

Equity-priority groups face disproportionate challenges accessing housing in Courtenay. Actions in this section can help staff plan for housing that addresses those challenges and evaluate projects on their ability to meet the needs of all Courtenay residents.

- 5.5.1 Expand staff training on housing needs and equity-priority groups in Courtenay. Equity-priority groups are communities that face significant collective challenges in participating in society. This marginalization could be created by attitudinal, historic, social and environmental barriers based on age, ethnicity, disability, economic status, gender, nationality, race, sexual orientation, or transgender status, etc. Housing challenges disproportionately affect equity-priority groups and staff awareness of these challenges can help them respond to community concerns and identify appropriate affordable housing developments.
- 5.5.2 Consider utilizing equity-impact assessments as a part of development applications, variance permits, or OCP amendment processes. Equity- impact assessments encourage making based on impacts to equity-priority or traditionally underserved groups
- 5.5.3 Encourage non-discriminatory housing options and universal and accessible design to support aging in place.