



# Affordable Housing Master Plan

## Town of Collingwood



October 2023

**Town of Collingwood**

**Affordable Housing Master Plan**

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***Disclaimer:***

The conclusions contained in this report have been prepared based on both primary and secondary data sources. NBLC makes every effort to ensure the data is correct but cannot guarantee its accuracy. It is also important to note that it is not possible to fully document all factors or account for all changes that may occur in the future and influence the viability of any development. NBLC, therefore, assumes no responsibility for losses sustained as a result of implementing any recommendation provided in this report. This report has been prepared solely for the purposes outlined herein and is not to be relied upon, or used for any other purposes, or by any other party without the prior written authorization from N. Barry Lyon Consultants Limited.



# 1.0 Introduction

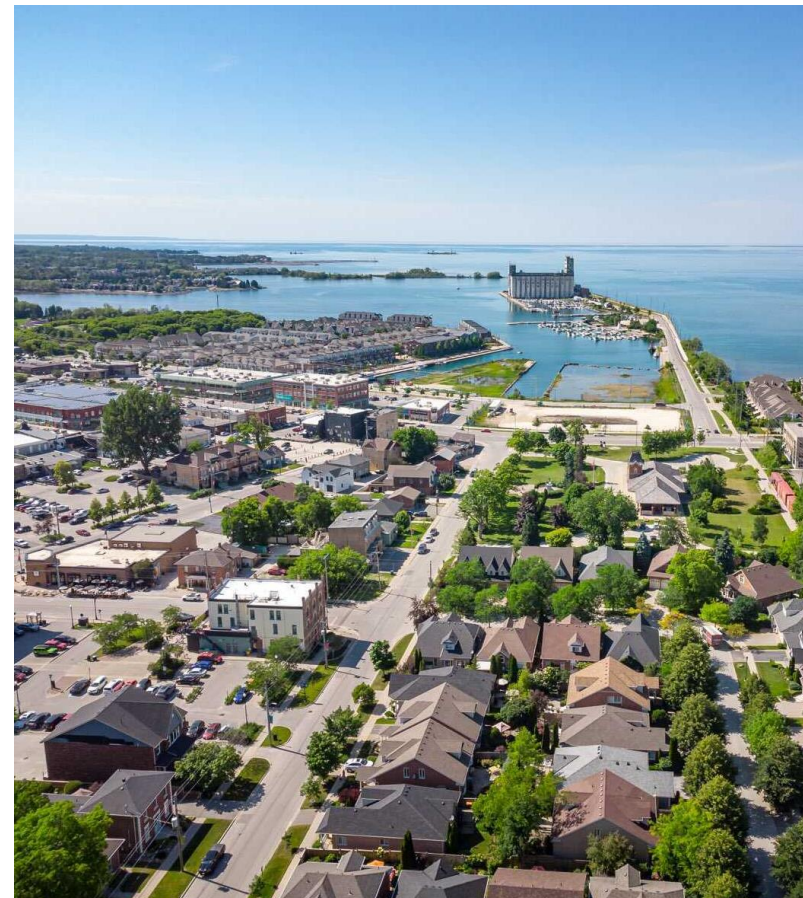
The Town of Collingwood (‘the Town’) retained N. Barry Lyon Consultants Limited (‘NBLC’) in early 2023 to prepare an Affordable Housing Master Plan (‘AHMP’). The AHMP builds on the recommendations provided by the Town’s Affordable Housing Task Force in 2021. The work is meant to provide the Town with an actionable strategy to address the affordability challenges experienced by current and future residents.

Phase 1 of the AHMP was the completion (June 2023) of a detailed Housing Needs Assessment (‘HNA’) that provides a foundational assessment of housing needs and affordability challenges in Collingwood. The HNA establishes current conditions and guides the recommendations brought forward through the AHMP.

Phase 2 of the AHMP was a Strategic Direction Options report, which provided a list of potential options for the Town to consider as they look to address the affordable housing issues in the community. While the initial list of options was extensive, it was refined through public and stakeholder consultation, as well as collaboration with Town staff, to create the basis of the recommendations in this AHMP.

As per the Town’s direction, the AHMP focuses on the housing needs of *moderate-income households* (i.e.,

those in the 4<sup>th</sup> to 6<sup>th</sup> income deciles). It is understood that low-income housing is the responsibility of Simcoe County as Service Manager, as well as senior levels of government, supported by the Town where possible.



Source: Chris Gardiner Photography

**Table 1** summarizes household incomes in the Town of Collingwood by decile group and household type in 2022. Using these incomes, the affordable purchase price and rental rate for each decile group is estimated. Moderate-income households are highlighted in the red box.

Moderate-income households in Collingwood can afford to purchase a home in the range of \$250,000 to \$370,000 or to rent a home that is between \$1,200 and \$1,700 per month. It is the creation and maintenance of housing at these price points that this AHMP strives to achieve.

**Table 1**

Household Incomes by Decile 2022, Town of Collingwood					
Income Group	Income Decile	All Household Income <sup>^</sup>	Affordable Purchase Price <sup>*</sup>	Renter Household Income <sup>^</sup>	Affordable Monthly Rent <sup>*</sup>
Low Income	1st	\$30,483	\$102,233	\$22,531	\$563
	2nd	\$45,062	\$151,126	\$29,379	\$734
	3rd	\$58,757	\$197,057	\$38,877	\$972
Moderate Income	4th	<b>\$73,999</b>	<b>\$248,173</b>	<b>\$47,712</b>	<b>\$1,193</b>
	5th	<b>\$90,565</b>	<b>\$303,734</b>	<b>\$56,990</b>	<b>\$1,425</b>
	6th	<b>\$109,341</b>	<b>\$366,704</b>	<b>\$68,034</b>	<b>\$1,701</b>
High Income	7th	\$130,326	\$437,081	\$80,625	\$2,016
	8th	\$161,251	\$542,713	\$98,297	\$2,457
	9th	\$214,264	\$728,864	\$129,221	\$3,231

*Note: Income deciles divide the population into 10 equal-sized groups according to total income. Those in the bottom decile group are the ones who fall in the lowest 10% of the total income distribution. Those in the top decile group are the ones who fall in the highest 10% of the total income distribution.*

*<sup>^</sup>Incomes from 2021 Census of Canada Custom Tabulation, inflated to 2022 using CPI (Canada).*

*<sup>\*</sup>Affordability thresholds assume shelter costs do not exceed 30% of gross household income. Affordable ownership thresholds include mortgage (25 years, minimum 5% downpayment, 1.16% property tax payment, 4% of loan amount for CMHC mortgage insurance, five year fixed mortgage rate 6.5%). Affordable rental thresholds based on 30% of gross household income.*

*Source: Statistics Canada, N. Barry Lyon Consultants Ltd.*

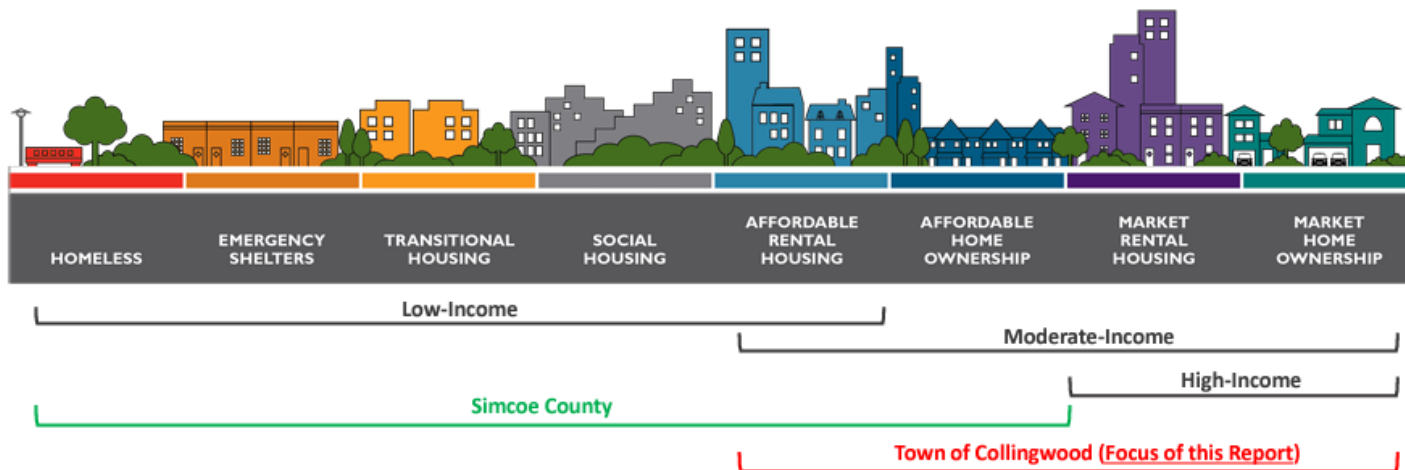
## 1.1 Roles and Responsibilities Across the Housing Continuum

This AHMP focuses on moderate-income households, which generally includes affordable rental and ownership housing as well as market rental and ownership housing (**Figure 1**). Simcoe County, in their role as Service Manager, is responsible for the needs of both low- and moderate-income households. Of note, Simcoe County is currently completing their own Attainable Housing Action Plan that is investigating ways to support moderate-income households, as well as an update to the Housing and Homeless Plan that

will support low-income household needs. Opportunities to collaborate with Simcoe County are therefore offered throughout this strategy.

Senior levels of government, including agencies such as the Canada Mortgage and Housing Corporation (CMHC), also play a role in addressing housing needs through the provision of funding and financing for new housing projects through the National Housing Strategy and other relevant programs.

Figure 1: Housing Continuum



## 1.2 AHMP Call to Action

**Private developers** provide most of the housing in Collingwood. The housing provided is at market value, which is increasingly beyond what moderate-income household can afford to pay. As will be explored throughout this report, there are opportunities to leverage the private sector to deliver a broader range of housing outcomes and pricing levels through strategic policy and financial interventions.

While **non-profit housing providers** can play a major role in the delivery of affordable housing and services, these actors are largely absent in the Collingwood market at a larger scale beyond the Simcoe County Housing Corporation that manages the supply of social housing in the County. This strategy intends to offer opportunities to enhance the presence and participation of non-profits in the Collingwood market.

**Residents and Employers** also play a role as advocates for safe and appropriate housing for all residents. Collingwood residents and employers should be more open to new development in the community to begin to address the current shortage of housing of all types. Residents can also create rental housing

opportunities within their home through participation in the Town's Rapid Accessory Dwelling Unit incentive program. Further, residents and employers can invest in social financing networks and take bolder action such as creating a land trust or housing co-ops.

There is also a role for the citizen-led **Affordable Housing Task Force** to continue in their role as advocates for new affordable housing initiatives implemented through this AHMP.

**This AHMP issues a Call to Action to all these stakeholders.**

It is recommended that at the conclusion of this project, the citizen-led Affordable Housing Task Force's terms of reference should be revisited to focus on education and advocacy to support and champion the new affordable housing initiatives implemented through this AHMP. The Task Force should act as a platform for community discussions and information sharing, in collaboration with the Town's Housing Development Coordinator. Many of the advocacy and coordination initiatives recommended in this strategy will fall to the Town's Housing Development Coordinator, who can be

supported by the Task Force. This revised mandate will also allow the Task Force to assist in communications specifically related to a public education campaign that supports initiatives stemming from this AHMP as well as supporting grassroots efforts related to the creation of non-profit housing providers and other related forms of social finance and equity.

This Call to Action also applies to developers in the community, where the Town's Housing Development Coordinator will link groups with available incentive and funding programs as well as non-profit partners.



## 2.0 Housing Needs Assessment Summary

A Housing Needs Assessment ('HNA') was completed in June 2023 with the intention of providing a foundational assessment of housing needs and affordability challenges in the Town of Collingwood to guide the Affordable Housing Master Plan. The following are key takeaways from the HNA:

- There are **next to no options in the market for moderate income households** in both ownership and rental tenures.
- There is an **acute shortage of rental housing** in Collingwood, with the purpose-built rental supply declining over the past decade due to insufficient new rental development.
- **Rental rates have been rising rapidly**, with most options now exceeding \$2,000 per month.
- **Renter households are far more likely than owners to be in Core Housing Need** (i.e., living in unaffordable, unsuitable, and/or inadequate housing). There is clearly a more pressing need to address the needs of renter households across a variety of incomes and characteristics.
- The **supply of ownership housing is also not meeting demand**, particularly from low and moderate-income households. Collingwood is attracting an increasing share of higher income households, and new supply is focused on this demographic.
- The Town of Collingwood's **ownership housing stock has experienced significant price growth over the last decade**. Many households, and particularly first-time home buyers, would be challenged to buy a new or resale home in the Collingwood market today.
- A lack of affordability in the ownership market is **driving 'would-be' purchasers to the already constrained rental market**.
- To accommodate the forecasted population growth to 2051, **more than 10,000 new housing units will be required**, at a variety of forms and price points.

**Table 2** on the following page synthesizes the market information collected by NBLC as part of the HNA with the income decile data from Statistics Canada to understand the market and non-market housing that is affordable to households in Collingwood. This helps to visualize what is or is not affordable to different income groups in Collingwood’s housing market today.

The full Housing Needs Assessment report can be found in Appendix A.

**Table 2**

Ownership Housing Affordability Gap Analysis, Town of Collingwood										
Income Decile		1	2	3	4	5	6	7	8	9
Affordability Threshold		\$102,233	\$151,126	\$197,057	\$248,173	\$303,734	\$366,704	\$437,081	\$542,713	\$728,864
Housing Type	Avg. Purchase Price									
NEW SALE										
Single-Detached	\$1,000,000									
Semi-Detached	\$705,000									
Townhouse	\$725,000									
Condominium Apartment	\$720,000									
RESALE										
Single/Semi-Detached	\$1,085,000									
Townhouse	\$820,000									
Condominium Apartment	\$640,000									
Rental Housing Affordability Gap Analysis, Town of Collingwood										
Income Decile		1	2	3	4	5	6	7	8	9
Affordability Threshold		\$563	\$734	\$972	\$1,193	\$1,425	\$1,701	\$2,016	\$2,457	\$3,231
Housing Type	Average Rental Rate									
Purpose-Built Rental Market										
New Purpose-Built Rental Apartment	\$2,125									
Old Purpose-Built Rental Apartment	\$1,935									
Secondary Rental Market										
Privately Leased Single/Semi-Detached	\$2,950									
Privately Leased Townhouse	\$2,700									
Privately Leased Condominium Apartment	\$2,300									
Privately Leased Basement Apartment	\$1,725									
Community Housing Affordability Gap Analysis, Town of Collingwood										
Income Decile		1	2	3	4	5	6	7	8	9
Affordability Threshold		\$563	\$734	\$972	\$1,193	\$1,425	\$1,701	\$2,016	\$2,457	\$3,231
% CMHC Average Market Rent	Average Rental Rate									
100% AMR	\$1,235									
80% AMR	\$988									
60% AMR (Low-End of Market)	\$741									
<p><i>Note: Affordability threshold is determined based on 30% of gross household income going towards housing costs. Average prices are based on a survey of available units or recent transactions. These prices are point in time and can change based on a variety of economic and market factors.</i></p> <p><i>Source: N. Barry Lyon Consultants Limited, Altus Data Studio, Canada Mortgage and Housing Corporation, Simcoe County Realtor</i></p>										

## 3.0 What is Causing Affordability Challenges?

In addition to NBLC's HNA, the University of British Columbia has developed The Housing Assessment Resource Tool (HART). HART is powered by Census data and meant to provide an estimate of the affordable housing deficit in communities across Canada. The tool primarily utilizes the Core Housing Need data from the Census to understand the affordable housing deficit and which groups or household types are most impacted.

As of the 2021 Census, HART estimates an affordable housing deficit of more than **1,300 units** in the Town of Collingwood and mostly for lower income households. However, HART's methodology acknowledges that **this estimate is a floor that likely underestimates housing needs**, meaning the actual need will almost always be higher. Based on the Town's forecasted growth to 2051, if no action is taken, the current deficit will nearly double to 2,500 affordable housing units.

Without action, there are likely to be serious economic and social consequences related to the ability of employers to staff businesses, increased homelessness, reduced growth potential and economic competitiveness, further lack of housing options for low- and moderate-income households, among other problematic outcomes. See Section 4 of this report for

further discussion of the feedback received from a range of stakeholders and the public through this study.

The Regional/National nature of the affordable housing challenge further complicates the ability of any single municipality to solve the problem. A lack of affordable and suitable housing is not isolated to Collingwood or even the Province of Ontario. Coordinated efforts are therefore needed across the entire County of Simcoe, Greater Golden Horseshoe, Province of Ontario, and Canada. If adequate housing is built in one location, but not another, demand for this housing will shift across a larger Region.

It is therefore important to recognize the current deficit and forecast of housing within Collingwood, while also identifying that this deficit and target will shift significantly over time. It is recommended that monitoring and reporting of this Affordable Housing Master Plan include broader metrics beyond a simple point-in-time housing target, which is presented in Section 7 of this report.

This section provides an overview of some of the reasons that Collingwood and other municipalities across Ontario and Canada are seeing housing affordability gaps. While the issues causing housing



gaps are complex, this section is intended to provide a high-level overview of some of the identified factors and provide support for the recommendations to follow.

## We Are Not Building Enough Housing

Arguably the biggest factor that has led to affordability gaps across Ontario and Canada is a lack of sufficient housing supply. Simply put, we are not building enough housing to meet the demand from a changing and growing population. As with any commodity, when demand outstrips available supply, prices climb.

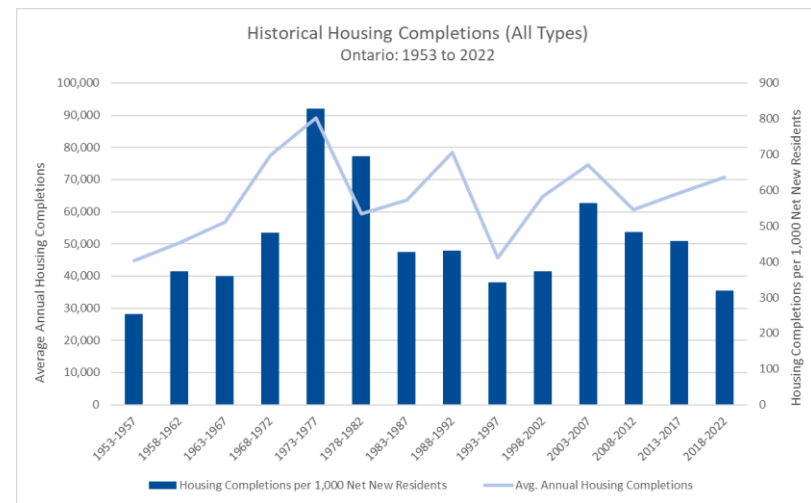
**Figure 2** illustrates the number of housing completions per capita of new residents in Ontario over the past 70 years. Housing completions have been declining over the past 15 years, and over the past five years, construction activity on a per capita basis has been at its lowest point (319 homes per 1,000 new residents) since the mid to late-1950’s (254 homes). In fact, the past five years have represented a rate of new construction activity that is less than 40% of peak activity in the mid to late-1970’s.

Relative to the rest of Canada, the lack of supply is particularly acute in Ontario. As illustrated in **Figure 3**, the number of private dwellings per person in Ontario is

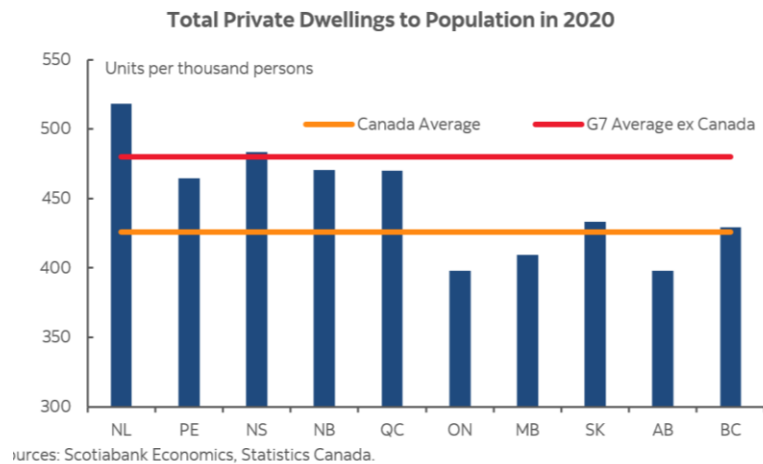
lowest of all provinces in Canada, well below both the Canadian and G7 average. According to Scotiabank, Ontario would need to add about 650,000 homes to reach the Canadian per capita average.

CMHC has identified a similar shortage, estimating that Canada requires an additional 3,500,000 homes (above baseline trends) by 2030 to restore housing affordability.

**Figure 2**



Source: Statistics Canada

**Figure 3**

## Household Dynamics are Changing

In addition to scarcity of housing, household dynamics are also shifting, putting a further strain on the market. There are two main causes worth noting:

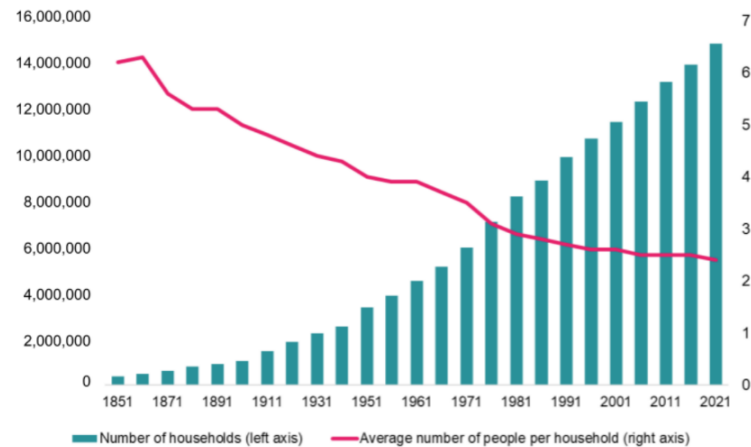
- The aging of the large Baby Boomer generation has resulted in many empty-nester households seeking to downsize; and,
- Younger adults are getting married later and having fewer children than in past decades.

These two things have combined to reduce the average household size. As household sizes decline, more housing is needed to serve the same sized population.

For example, if a population of 1,000,000 residents has an average household size of 3.0, a minimum of 333,333 homes are needed. If that average household size declines to 2.5, the same population requires a minimum of 400,000 homes. This does not include additional homes needed to service demand from post-secondary students, temporary foreign workers, and demand for secondary homes or short-term rentals, among others.

**Figure 4** illustrates the long-term trend of average household sizes in Canada to 2021. The average household size of 2.43 persons in 2021 represents a significant shift from the 1950's through 1970's when average household sizes were between 3.0 and 4.0 persons, all the while more housing was being built on a per capita basis.

**Figure 4: Average household size and total households in Canada, 1851 - 2021**



Source: Statistics Canada Catalogue no. 98-316-X2021001 and 11-630-X2015008

## Changing Lifestyles / Limited Downsizing Options for Seniors

The large Baby Boomer generation is now into their senior years and are healthier and living longer than past generations. This has had an impact on housing choices, with more seniors choosing to stay in their single-family homes longer, delaying the natural turnover that occurred in previous decades.

Further compounding this is that for many seniors who would like to downsize, there are few options. Outside of some select municipalities in Ontario, most

residential options are low-rise, ground-oriented housing types (68% in Ontario, 77% outside Toronto), which do not meet the needs of many downsizers. At the same time, apartment development that has occurred in recent years often consists of increasingly compact units and high proportions of one-bedroom units.

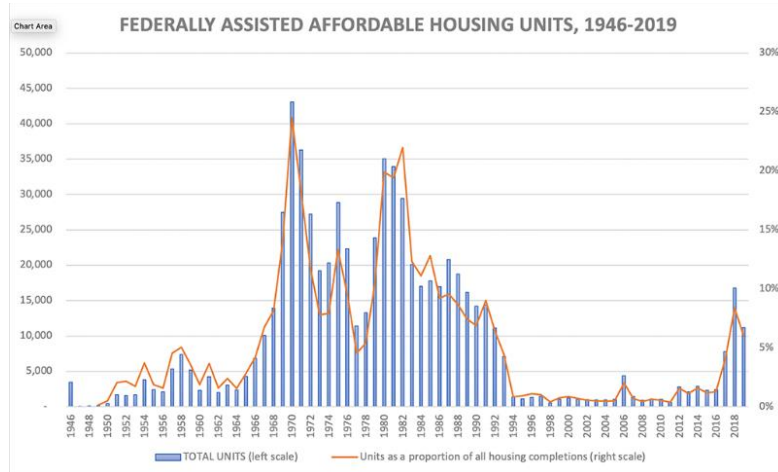
## Limited Affordable and Market-Rate Rental Development

The tenure of housing that is being built is also playing a role in the affordability crisis. For several decades, there has been far too little affordable and market-rate rental housing constructed – two housing types that have historically accommodated low and middle-income households.

Canada built a lot of federally assisted affordable housing units in the 1960s through to the 1980s. Downloading of responsibilities to the provinces and then to municipalities, the end of federal funding for new social housing in the mid-1990s, and the end of social housing as a significant national policy priority all contributed to the steep decline in affordable rental housing supply (**Figure 5**).

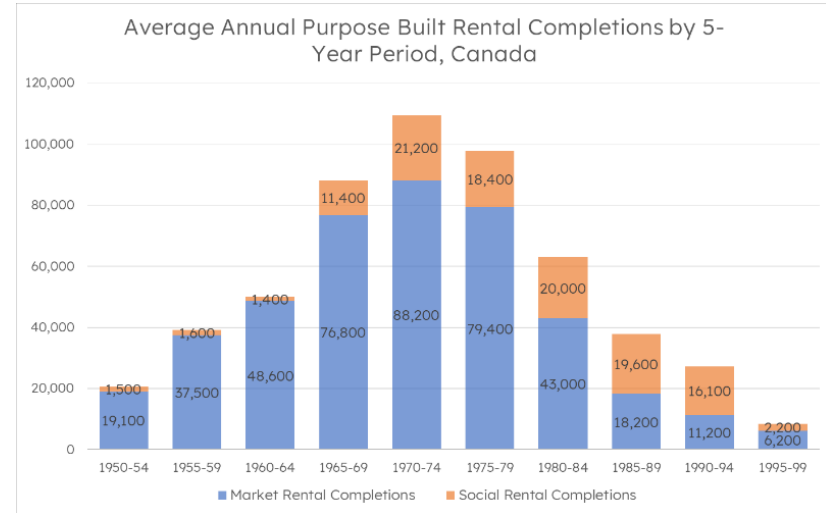
Construction activity has started to improve in recent years in response to initiatives borne out of the Federal government’s National Housing Strategy. However, after 25+ years of relative inaction, and widening affordability gaps, this represents just a small portion of what is needed.

**Figure 5**



Source: The Tye, “Why Can’t We Build Like It’s the 1970s?”, April 22, 2022

**Figure 6**



Source: Dr. Mike P. Moffatt

At the same time, changes were also made that impacted the attractiveness of new market-rate purpose-built rental investment. The private sector built a significant amount of new market rentals in the 1960s and 1970s (**Figure 6**). Policy changes since then around rent control, GST/HST, subsidies, and other measures, led to a steep decline of private sector rental investment starting in the 1980’s, requiring that the growing base of renters in Canada rely on secondary rentals that do not offer the same security of tenure.



Today, rental development is plagued by high equity requirements and relatively low returns, which has led to most projects pursuing condominium tenure. Condominium projects present less risk, higher and quicker returns, and higher land values, which rental projects struggle to compete with.

## **Restrictive Planning Policies & Onerous Development Process**

Outdated restrictions on new development require that many developers seek amendments to zoning by-laws or Official Plans to build new housing. This delays new development and adds to the costs and risk profile of new housing development. These costs can impact project feasibility and restrict housing supply. Where demand for housing outstrips supply, these dynamics mean that developers can (and need to) charge more for housing in order to maintain viability.

In many municipalities, the development process has become more and more complicated, with design guidelines and other requirements that exert further control over what can and cannot be built. Appeals, a long list of required studies, peer reviews, public consultation requirements that can go beyond what is

set out in the Planning Act, and other factors also play a role in making development process more onerous and creating an environment where it is harder to build new housing.

Restricting where new housing development can be built also creates a premium for developable land. Where few development sites exist, land values increase substantially, which creates many unintended consequences:

- High land values due to competition from developers, requiring high density and/or premium market positioning for projects to ‘pencil’.
- Landowners seeking planning permissions to improve the value of their land, but without near-term plans to build.
- Most development is undertaken by the larger developers who have substantial capital, expertise, resources, and political connections necessary to undertake a complicated and multi-year entitlement and construction process.

## Local Opposition to New Development (NIMBYism)

Residents who are passionate about their communities often want to have a say about what gets built and where it gets built. However, within this space, there is some extreme opposition to change and new development. These individuals or resident groups are often labelled as ‘NIMBY’ (‘not-in-my-backyard’).

The impact of opposition voices can delay new development or require compromises from the developer that can risk project feasibility and can reduce affordability. In some communities where the NIMBYism issues are well-known, it may even discourage some developers from trying to build at all, with a belief that opposition to growth and change is so strong that it may not be worth the effort, time, and resources.

Restrictive planning policies help support opposition to new development, increasing the importance of

reforming local land use restrictions and creating a more streamlined approvals process.

## Construction and Development Costs

The cost of development has been rising. This includes both hard construction costs and soft costs. **Table 3** summarizes how hard construction costs have changed in recent years<sup>1</sup>, indicating an increase of \$80 to \$130 per square foot, or 45% to 70%, since 2019. At the same time, development charges have increased in many municipalities, and rising interest rates more recently are now also making construction more expensive.

Delays caused by restrictive planning policies, an onerous development process, and the impacts of NIMBYism also contribute to the rising cost of development in many communities.

As costs go up, developers need to raise their prices in order to ensure they receive a return, otherwise the project is no longer feasible. Rising costs mean that most developers now compete at the upper end of the

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<sup>1</sup> Specific construction cost data was not available for Collingwood, however, we would expect similar trends in Collingwood as the GTA given their proximity.

market to achieve the rate of return on investment that will be required by lenders and equity investors in a project. Historically, new housing projects were positioned towards a broader segment of the population, including middle/ moderate-income groups, which was made possible by lower development costs and a strong supply of development-ready greenfield land where low-density housing could be built quickly.

**Table 3**

Change in Per Square Foot Construction Costs GTA, 2019 to 2023				
Housing Type	2019 Average	2023 Average	Change (2019 to 2023)	
Single-Detached	\$165	\$245	\$80	48%
Townhouse	\$133	\$223	\$90	68%
Stacked Townhouse	\$158	\$253	\$95	60%
6-Storey Apartment	\$188	\$283	\$95	51%
12-Storey Apartment	\$225	\$328	\$103	46%
25-Storey Apartment	\$223	\$328	\$105	47%
40-Storey Apartment	\$230	\$360	\$130	57%
Underground Parking	\$138	\$233	\$95	69%

*Note: Average pricing per square foot is based on the mid-point of the range provided by Altus Group in their annual construction cost guide.  
Source: Altus Group*

These rising costs also have a significant impact on the delivery of new affordable housing. These developments are often exposed to the same costs as a market-rate project. As such, as costs increase, the

required level of subsidy to fund the affordable housing increases, which impacts the scale of housing that can be delivered. Non-profits, in particular, are being affected by this issue, as rising interest rates have reduced the amount of project costs that can be financed, requiring greater upfront equity for projects to advance.

### Labour and Material Shortages

Labour supply for new development is a key factor contributing to the housing shortage and may be a limiting factor in the Province reaching its own goal of 1,500,000 new homes over 10 years.

The construction industry is already short an estimated 80,000 workers across Canada according to CIBC, including shortages for both labourers and skilled trades. A coming wave of retirements could make the problem worse over the next decade.

Job vacancies in the construction industry not only limit how much new housing can be delivered on an annual basis, but also drive up building costs, which has a trickle down effect on housing affordability, as noted throughout this section.

Material shortages – such as lumber, steel, and aggregates – while not as acute as labour shortages today, were also a significant limiting factor during the COVID-19 pandemic that contributed to the recent slowdown of new development. Alternative construction techniques such as modular housing, panelization, shipping containers, and others, could help to reduce the burden on more traditional construction from a materials and labour standpoint.

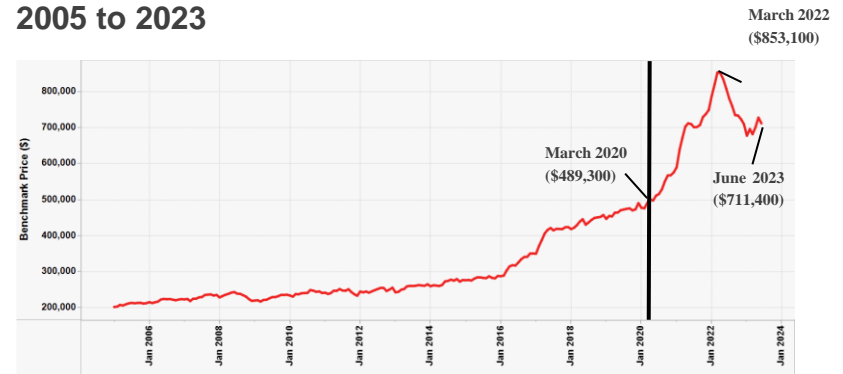
### Impacts of COVID-19

The COVID-19 pandemic changed the way many people work and also changed people’s priorities when it came to lifestyle and housing. In 2020, after initial economic lockdowns, many households chose to move – seeking more space, or seeking a home outside of larger cities. Locations like Collingwood therefore became very popular.

The increased demand for low-rise homes during the pandemic contributed to a significant spike in home prices. **Figure 7** illustrates the monthly benchmark resale price in Collingwood since 2005, which follows a similar trend as most other municipalities in Southern Ontario. At the beginning of the pandemic in March

2020, benchmark prices were under \$500,000 in Collingwood but quickly rose to more than \$850,000 in two years (+74%). While prices have since declined due to the impacts of rising mortgage rates, they are still up about 45% in just over three years. Rising interest rates have also meant that affordability has not improved, despite price compression in the market.

**Figure 7: Benchmark Resale Prices in Collingwood: 2005 to 2023**



Source: The Lakelands Association of Realtors

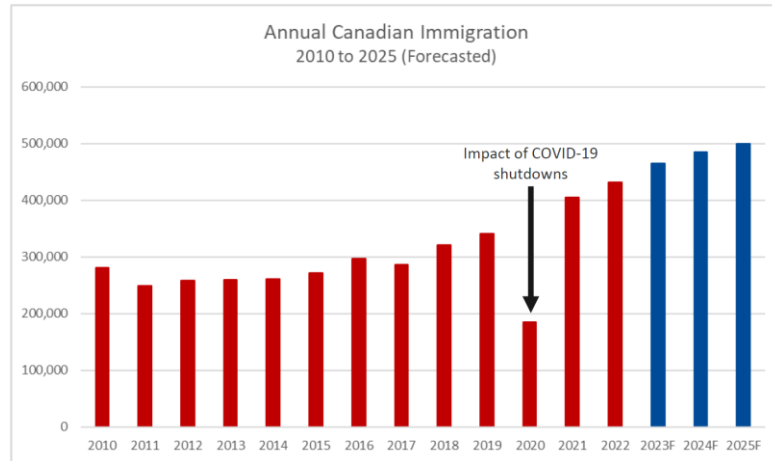
### Population Growth

Relating back to the subsection on housing supply, population growth also plays a significant role in the shortage of housing, particularly in recent years. Canada’s immigration targets have been ramped up in



recent years and are forecasted to reach 500,000 new Canadians annually by 2025 (**Figure 8**).

**Figure 8**



Source: Statistics Canada

This has an obvious impact on the housing market. As the population grows, construction activity needs to grow with it. Unfortunately, for a variety of reasons – including many noted within this section – construction activity has not kept pace with the increasing rate of population growth.

## Post-Secondary Enrollment Pressures

Many students require relatively affordable housing options and often must compete in the market with low- or moderate-income households, putting a further strain on this increasingly limited segment of the market. As post-secondary enrollment increases so too does housing demand from students.

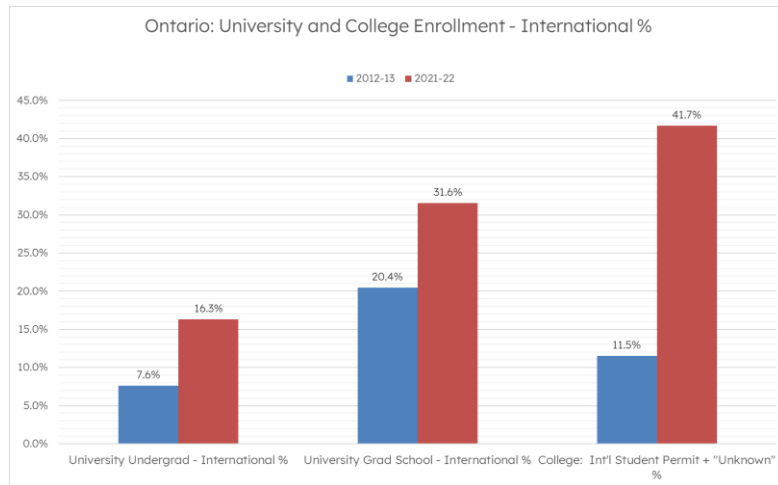
More recently, both Universities and Colleges have expanded their international enrollment – with the increase being particularly dramatic for Colleges, about half of which in Ontario now feature a student body with 40%+ international students (**Figure 9**).

While many domestic students can live with family if attending school locally, international students cannot. The shift towards a higher proportion of international students has had a considerable impact on housing markets, particularly those that include Colleges.

At the same time, these schools are not building student housing at a rate that responds to these changes in enrollment – and the housing that is built tends to be unaffordable for most students. This forces students who are seeking housing to look elsewhere in the housing market and to compete with residents for the

limited supply of relatively affordable housing in the market. This is putting significant strain on the rental market.

**Figure 9**



Source: Dr. Mike P. Moffatt

## Secondary Homes and Short-Term Rentals

Secondary homes and homes used as short-term rentals are also likely having an impact on housing affordability in Collingwood.

In Collingwood, in addition to those that have been purchased as secondary / vacation homes, there are also more than 300 homes that are listed on short-term

rental websites, according to AirDNA (**Figure 10**). This is a region-wide trend with Blue Mountains (850) and Wasaga Beach (450) featuring even higher numbers of short-term rental homes. While it is possible that not all these homes are leased out as short-term rentals year-round, these figures are still notable.

Secondary homes and short-term rentals remove homes from the market that could otherwise be used for a full-time resident household. In communities like Collingwood, the demand for secondary homes / short-term rentals needs to be considered when forecasting housing need as more dwelling units will be required to accommodate the local and seasonal populations.

Notwithstanding the above, it is important to also consider that the tourism industry is critical to Collingwood’s economy, and to that of the wider South Georgian Bay region. Consideration should therefore focus on how to reduce the impact of secondary homes / short-term rentals on local housing affordability while also understanding that these dwelling units may also serve an important economic purpose from a tourism perspective. Surveys completed by the Town have also indicated that some residents have rented their homes

through short-term rental arrangements to ease rising mortgage costs.

The Town of Collingwood has embarked on a regulatory review for short-term rentals, which attempts to balance the positive aspects and challenges of these units.

## 4.0 Public and Stakeholder Consultation

This section provides a summary of the community and stakeholder engagement efforts that have been undertaken in support of the Affordable Housing Master Plan. The consultation process included a total of two meetings with the public that were co-hosted by the Town's Affordable Housing Task Force, an online survey, and more than 10 meetings with key stakeholder groups, as well as select individual interviews.

The following factors were of utmost importance to NBLC when conducting the consultations:

- **Equity, Diversity & Inclusion:** The need to be equitable in engagement and include a diversity of voices is increasingly recognized as paramount to successful engagement processes.
- **Establishing Trust:** Clearly articulating to participants how their input is helping to shape the evolution of the AHMP helps to close the 'feedback loop' and builds trust between stakeholders and the public.
- **Education as Part of Engagement:** Providing people with the knowledge and context they need to be adequately informed to engage in municipal processes is both a challenge and a critical success

factor. An educational element to consultation helps to allow more people to feel comfortable with sharing ideas.

### 4.1 Purpose of Consultation

As part of the development of this AHMP, NBLC engaged with the public and key stakeholders to achieve the following goals:

- Introduce the development of the AHMP by educating the public and stakeholders on existing housing issues in the Town of Collingwood through the findings from NBLC's Housing Needs Assessment.
- Promote awareness of the benefit to a defined Affordable Housing Master Plan for the Town and the potential it has to provide new housing options to create affordable housing for moderate-income residents.
- Hear from residents, as well as employers, about their current housing situations and receive feedback, advice and considerations on the recommended Strategic Direction Options and Implementation Strategies developed by NBLC to improve housing affordability in Collingwood.

- Hear from targeted stakeholder groups composed of key members of the community about their experiences and challenges related to housing affordability and receive feedback, advice and considerations on the recommended Strategic Direction Options and Implementation Strategies developed by NBLC.
- Consult with the Town's Affordable Housing Task Force on solutions to the affordable housing crisis as an elevated stakeholder group.

## 4.2 Public and Stakeholder Engagement

An online survey was developed and made available to the public through the Engage Collingwood website to allow for online engagement about current housing conditions in Collingwood and to generate ideas to help improve housing options. The survey was available for two months and was completed by 165 participants. Just under 300 people viewed the survey on the Engage Collingwood online page.

The following consultation events took place in support of the Affordable Housing Master Plan:

- **Public Consultation #1 (June 6<sup>th</sup>, 2023):** The first public consultation meeting was conducted virtually with approximately 75 participants attending. The meeting included a shared story from a local Collingwood resident, a presentation from NBLC on the Housing Needs Assessment, and a question-and-answer period where NBLC and the Town responded to comments and questions about the findings of the Housing Needs Assessment, the overall AHMP process, and affordable housing in Collingwood in general.
- **Stakeholder Meetings (June 14<sup>th</sup> - June 30<sup>th</sup>, 2023):** NBLC conducted a series of stakeholder meetings over two weeks in June 2023. An initial ten meetings were conducted, each with a different stakeholder group made up of multiple members. In some instances, follow-up meetings were conducted where the AHMP would benefit from one-on-one conversations with specific individuals. Close to 70 individuals participated and the stakeholder groups that were consulted included:
  1. The Town of Collingwood's Affordable Housing Task Force;
  2. Non-profit groups;

3. Housing providers;
  4. Indigenous groups;
  5. Community groups;
  6. The development community;
  7. Local employers;
  8. Town of Collingwood Council;
  9. Town staff; and,
  10. Government groups (other levels of government).
- **Public Consultation #2 (August 15<sup>th</sup>, 2023):** The second public consultation meeting was conducted through a hybrid format, with the meeting occurring in-person at the Collingwood Public Library and also being available live in online webinar format. Approximately 80 participants attended the session. The meeting included a presentation from NBLC on the Strategic Direction Options report, as well as a question-and-answer period where attendees voiced their opinions, provided feedback and inquired about the Strategic Direction Options and overall AHMP.

### 4.3 'What We Heard' Summary

The feedback, advice and considerations shared by participants through the online survey and the above events are captured below. This summary reflects the key points shared by participants through these engagements and is not intended to be a verbatim transcript or to attribute specific comments to any single individual or group (confidentiality was a key component of the stakeholder engagement that allowed for frank and transparent discussions to occur). The star symbol denotes areas where the Town is already taking action.

#### Survey Results

- Homeownership is a goal for nearly 70% of respondents.
- Over half of respondents (55%) would not consider adding an accessory dwelling unit to their current home or on their property.
- Many respondents (65%) are not satisfied or only somewhat satisfied with their current housing situation and how it suits their needs.
- Over 40% of respondents are not satisfied with their current housing situation because of the cost of rent, mortgage, and/or utilities.



- An accessory dwelling unit would suit the needs of 40% of respondents.
- Housing affordability is a barrier to over 60% of respondents living in Collingwood, with the biggest challenge being unaffordable pricing (88%).

## Public Consultation

- The future of Collingwood is at stake if action is not taken on the affordable housing issue. It is critically important that municipal processes (e.g., development approvals, funding strategies, etc.) are set to be quicker, faster and better.
- The Town should look to regulate vacation rental units. They should also consider incentives to encourage these short-term rental units to become long-term rental units. \*
- The Town should undertake an exercise to create an inventory of surplus municipally owned properties for affordable housing development. \*
- Recent changes to the Planning Act that allow up to three units on a property will help the issue of affordability but is not a silver bullet. Off the shelf designs for ADU's could be leveraged through this legislative change to help improve affordability. \*

- Finding ways to reduce costs to developers is an extremely effective tool the municipality can do to ensure affordable units get built, however it is only one tool in the toolbox.
- The Town should look at ways to streamline the municipal approvals process. \*
- Reaction to the idea of raising taxes for the purpose of affordable housing was mixed, with some participants noting opposition and others being in favour.
- We need to look long-term and ensure that new affordable housing developments stay affordable longer than 15 to 20 years.
- Residents emphasize the importance to differentiate between affordable and social housing.

## Stakeholder Consultation

- NIMBYism is an issue in the Town of Collingwood. The Town needs to communicate effectively and positively with the public on the topic of affordable housing. \*
- Successful models for developing new affordable housing in the Town will need support from other levels of government.

- One of the main barriers for housing providers and non-profits building affordable housing is financing and equity requirements.
- Local employers are buying houses and renting them out to employees to ensure that they have an affordable place to live that meets their needs. Some others are providing down payment assistance.
- A concierge program to pair developers or non-profit housing providers with groups that have land would help in getting more affordable units built. A program that pairs these partnerships with funding and financing programs will also be important. \*
- Social financing tools should be explored including community bonds, community land trusts, and cooperative housing models. The Town could seed fund the financing of establishing a community land trust.
- Municipalities need enhanced partnerships with private and public groups that can be shared regionally to discuss common affordable housing goals. \*
- The development community cannot operate at a loss and needs the Town to look at a wide mix of options to help. Strategies can include removing development charges, fast tracking approvals, connecting developers with groups that have land, among other options to help units get built at affordable prices.
- Renovation incentives for old housing stock should be provided to readapt or reuse assets.
- Pilot programs are an effective tool for measuring the effectiveness and impact of new affordable housing policy.
- Simcoe County is issuing a ‘call for land’ for the explicit purpose of building new affordable housing.
- The Town should leverage CMHC’s Rapid Housing Initiative and the Housing Accelerator Fund to increase funding for affordable housing. \*
- Alternative housing forms like modular or container housing should be explored as low-cost design options. \*
- Single-family zoning should be eliminated entirely, and zoning should be simplified.

#### **4.4 Integrating Community Engagement with the AHMP**

Aside from the second public consultation event, all the public and stakeholder consultations occurred prior to the development of NBLC's Strategic Direction Options report. This allowed for the commentary, feedback, opinions, and advice that was heard to be integrated into the recommended solutions developed to address the growing affordability issues in the Town.

While many of the suggestions from the public and stakeholders were used to shape the inclusion and direction of the recommended strategies in this plan, not all feedback has been included for a variety of factors (e.g., out of the Town's control, feedback was not legal/implementable, better to be undertaken by other groups, etc.).

A Strategic Direction Options report was completed in August 2023 (see Appendix B) that laid out a long list of options for the Town of Collingwood to consider as it looks to address growing affordability issues for moderate-income households. This report contained a total of 42 strategic direction options for the Town to consider, organized into the following four categories:

- **Policy and Process Reform:** Given existing fiscal constraints, the most active role a municipality can have in delivering housing is through land use planning. Creating a more permissive policy/regulatory environment and more efficient internal processes to ensure more housing (of all types and prices) is approved and constructed will be critical moving forward to try to bring balance to the market. A lack of supply is a significant contributing factor to the affordability gaps being observed.

A more permissive policy environment will ensure that more housing will be built, and more efficient internal processes should reduce delays, which has positive impacts on project costs and development feasibility. Lowering costs and increasing the supply of developable land creates more elasticity in pricing, allowing developers to compete at a wider

range of prices while still achieving their required return. It also helps affordable housing providers to advance more quickly through the process and with increased certainty.

- **Offer Development Incentives:** The Town of Collingwood needs to provide various incentives to reduce the cost of development for housing providers who are seeking to build the types of housing that are identified as a priority. Development incentives improve the feasibility of new housing that is not already being delivered naturally by the market. There are a wide range of incentives that can be provided by the Town of Collingwood, in addition to the use of Town-owned land for new residential development. Senior levels of government must also play a role here.
- **Act as a Coordinator to Get Affordable Housing Built:** While the Town of Collingwood may not have the ability or resources to construct or fund a significant amount of new housing on their own, they can be a leader in the delivery of new housing in other ways. This includes taking the initiative to declare new residential development and the infrastructure needed to support it as a priority, educating residents, identifying public land for new

- housing, connecting interested parties to potential partners and funding programs, among other initiatives.
- **Advocate to Other Levels of Government:** More active participation from the Provincial and Federal governments will be required to have a more significant and lasting impact on housing affordability, particularly in subsidizing affordable housing development. Advocacy to other levels of government to help in solving housing affordability issues, ideally with targeted requests, will be critical for the go-forward strategy.

The initial list of 42 items from August 2023 has been refined through consultation with Town staff, key stakeholders, Council, and the public, as well as considering best practices, lessons learned in other municipalities, and NBLC's internal expertise. This refined list of options is presented in **Table 4** and represents the recommended strategies for implementation through this AHMP.

This combination of strategies creates an implementable master plan that couples market-oriented land use planning reforms with a proactive government role, including leveraging public land as well as direct investment, to increase the development

of housing that meets the needs of moderate-income households.

When evaluating the original 42-item list, as well as the diversity of feedback received, the following considerations were applied to refine the options presented in this AHMP:

- Does the municipality control the outcome?
- Through consultation with Town staff and legal representatives, is the option legally possible for the Town to implement?
- Can the Town realistically implement an action given current or reasonably projected financial and staffing resources?
- Is the proposed action a duplication of funding / processes / programs already in place with senior level government programs (e.g., National Housing Strategy, County Housing and Homelessness Plan, etc.)?
- Is a proposed action more easily delivered by another level of government or business/non-profit sectors?

- Which actions can be taken-on efficiently by the Town with limited additional financial or administrative burden?
- Which actions will have the biggest impact on housing affordability and supply?
- Can the items be combined in this AHMP to obtain the same result?
- Other similar considerations.

Some of the feedback received has therefore been fully assessed but not recommended for implementation through the AHMP, has been included as something the Town can advocate for or through coordination with neighbouring municipalities and Simcoe County, or are included in the call to action for other community partners who can more effectively and efficiently deliver the desired outcome.



## Methodology

The following explains the ranking system that was utilized for all of the strategic directions in terms of potential impact, the potential cost of its implementation, and the estimated timeline for implementation. This ranking is meant to provide the Town of Collingwood with additional insight into each of these strategic directions, however, this ranking is an estimate. It is possible that in any option, the true impact, cost, or timeline may be above or below what we have estimated.

### **Impact: How impactful will the direction be in increasing housing options in Collingwood, relative to others?**

The level of impact is estimated based on a number of factors such as how scalable the recommendation is, how much new housing supply it is likely to create, how likely it is that the recommendation will produce housing for moderate-income households, and how much control the Town has over the that specific recommendation, among others.

★ **Minimal Impact**

★★ **Low Impact**

★★★ **Moderate Impact**

★★★★ **High Impact**

★★★★★ **Maximum Impact**

### **Cost: How much should the Town expect the implementation and/or ongoing administration of the strategic direction to cost?**

**\$:** Low-Cost (<\$100,000): This may represent no cost to the Town, a small one-time cost, or the cost of one new staff member.

**\$\$:** Medium Cost (\$100,000 to <\$1,000,000): This may require the hiring of consultants, several staff members, and/or ongoing costs.

**\$\$\$:** High-Cost (\$1,000,000+): Directions in this category are likely to be most significant from a budget and investment perspective.

**Timeline: How long might it take to implement the strategic direction?**

**Immediate:** These can be implemented immediately after the Master Plan is completed. Implementation could take less than a month.

**Near-Term:** These directions can be implemented in less than one year.

**Medium-Term:** These directions are likely to take between one and three years to implement.

**Long-Term:** These directions are likely to take three or more years to implement.

Table 4

<b>Recommended Approach</b>			
<b>Town of Collingwood Affordable Housing Master Plan</b>			
	<b>Impact (1 to 5)</b>	<b>Cost (\$ to \$\$\$)</b>	<b>Timeline (Immediate to Long-Term)</b>
<b>Recommended Policy, Process, and Regulatory Changes</b>			
1. Refine the Upcoming Comprehensive Review of the Town’s Zoning By-Law	5	\$\$	Near
2. Work Towards a Decision Faster (Shorten Approvals Timelines)	4	\$\$	Near
3. Enact a Rental Replacement By-law in Order to Preserve Existing Rental Stock	3	\$	Near
4. Source Simple Pre-Approved ‘Off-the-Shelf’ Building Designs	3	\$	Near
5. Shift the Public Discourse Around Growth, Density, and Affordable Housing Through a Public Education Campaign	3	\$	Near
<b>Recommended Financial Approaches</b>			
6. Create a Municipal Capital Facility By-law to Offer Incentives for Targeted Projects	5	\$\$\$	Medium
7. Use Public Land to Deliver new Affordable Housing	5	\$\$\$	Medium
8. Expand Rapid ADU Program to Include More Options	2	\$\$	Near
<b>Recommended Coordination Initiatives</b>			
9. Expand the Existing Concierge Program to Connect Parties Who are Interested in Partnering to Deliver New Housing	4	\$	Near
10. Explore the Potential for Density Bonusing for Priority Projects	3	\$	Medium
11. Pursue Economies of Scale by Partnering with Other Municipalities	4	\$	Medium
12. Treat the Private and Non-Profit Sectors as Partners	3	\$	Immediate
13. Be Encouraging of Non-Traditional Construction Techniques, Housing Tenures, and Funding Models	3	\$	Immediate
14. Ensure the Town of Collingwood has Robust Data Collection to Support Good Decision-Making	3	\$	Near
15. Consider Housing Above or in Conjunction with New Public / Community Facilities	2	\$/\$\$	Immediate
16. Explore Alternative Revenue Tools	2	\$\$	Medium
<b>Recommended Advocacy Initiatives</b>			
17. Advocate for the Elimination or Deferral of HST on New Purpose-Built Rental Developments	5	\$	Near
18. Advocate for More Revenue Tools to Reduce the Burden on the Tax Base	5	\$	Medium/Long
19. Advocate for the County to Participate in any Local Incentive Programs	4	\$	Medium
20. Advocate to CMHC for More Streamlined Access to Funding and Financing Programs	4	\$	Long
21. Ask the Province to Define Attainable Housing and Incentivize It	3	\$	Near/Medium
22. Advocate for Increased Labour Supply for New Development	4	\$	Long
23. Request Targeted Funding Where it is Not Currently Available	5	\$	Medium / Long
24. Advocate for More Progressive Property Taxation Options	2	\$\$	Long
25. Leverage the Collective Power of Municipalities in Advocacy	3	\$	Long
26. Advocate for the Use of Inclusionary Zoning	3	\$	Long

The affordable housing crisis will not be improved without significant action from all levels of government, including the Town of Collingwood. While municipalities have many levers available that can meaningfully impact housing affordability, their revenue tools and overall capital budgeting is limited. Greater action and funding from other levels of government are therefore also necessary to meaningfully address current housing challenges. Participation from the private and non-profit sectors will also be critical in ensuring that new affordable housing supply gets built.

While Town resources are limited, affordable housing is in desperate need of focused and accelerated attention. The Town of Collingwood should therefore plan to allocate as many resources as possible to this file while also leveraging increased support and funding from Simcoe County and senior levels of government. It is not possible for Collingwood, in isolation, to meaningfully influence affordable housing delivery without this collaboration and stacking of financial resources.

Depending on the number of implementation strategies advanced, and the level of involvement from Simcoe County, additional staff resources may be required to

assist the Town's Housing Development Coordinator. Given the limited budget for funding affordable housing, efforts should be made to ensure that any new staff salary is not funded through the affordable housing reserve fund.

It is also highly recommended that the Town report on affordable housing issues annually and utilize lessons learned over time to adjust any programs and policies to maximize effectiveness. The strategies incorporated in this report should be a 'living document' that are constantly being refined as the market, funding, and policies shift over time. Section 7.0 of this report to follow provides recommendations for reporting and monitoring on the AHMP.

### 6.1 Priorities for the AHMP

The HNA, Strategic Direction Options Report, and consultation / feedback throughout the AHMP process has identified the following housing types to be prioritized, in this order:

- Affordable rental housing;
- Market-rate rental housing;
- Affordable ownership housing.

Affordable rental housing should be the highest priority in the Town of Collingwood. However, the shortage of market-rate rental housing in Collingwood, as noted in the HNA, and the economic challenges associated with building this housing type justifies making it a secondary priority for any housing programs offered by the Town.

## 6.2 Financial and Staff Resources

A key variable impacting the implementation of this AHMP is the capacity of current Town staff and the budget available to fund the identified actions.

The Town has recently hired a Housing Development Coordinator who will be the primary individual responsible for the implementation of this AHMP, with assistance from the wider Planning Division and a variety of senior managers. Beyond the Housing Development Coordinator, the Town has indicated that staffing resources are currently limited in their ability to absorb administrative responsibilities resulting from the implementation of the AHMP. While some of the initiatives recommended for implementation can be handled by the Housing Development Coordinator, additional staff may also be necessary as identified in the sections to follow.

Affordable ownership housing opportunities through non-profit groups like Habitat for Humanity may also be compelling. Flexibility for the Town will be key. Interest in housing programs can vary from year-to-year, so flexibility in what is available and to who will allow the Town to be nimble and be as impactful as possible.

The Town has been budgeting \$350,000 annually in recent years to fund affordable housing programs and strategies. It is recommended that this budget be increased to at least \$1.0M, and ideally \$3.0M annually to more effectively implement the strategies identified.

While Sections 6.3 to 6.6 of this Plan highlight the specific actions recommended for implementation, Section 6.7 offers guidance as to how the Town might proceed depending on the budget and staffing provided.

The following presents the strategies recommended for implementation through the AHMP:

## 6.3 Policy, Process & Regulatory Changes

Significant changes to planning policy province-wide are needed to increase housing supply. The Town of Collingwood is currently completing an update to its Official Plan, which is making strong progress towards

creating a more permissive planning environment for new housing.

Beyond the Official Plan, we recommend that the Town of Collingwood review the zoning by-law to assess areas where the delivery of housing could be streamlined. A review of the zoning by-law is budgeted to begin in 2024 after the new Official Plan is adopted and should not therefore utilize any significant amount of the Town's financial resources being dedicated towards the implementation of the AHMP strategies to follow. A caveat is that some of the recommendations may extend project timelines and increase the likelihood of appeal, both of which have financial ramifications. Ensuring a robust public education campaign will be critical and budget should be allocated to support this effort.

The creation of a more permissive planning environment, where housing outcomes are permitted as-of-right, will allow development of all types (e.g., affordable and market) to advance more quickly and with greater certainty and reduced risk. It will also allow for gentle intensification within neighbourhoods, which zoning currently restricts.

Other by-laws are also recommended in this strategy to protect the existing supply of rental housing. The rental housing stock in Collingwood has shrunk over the past two decades at a time when demand has never been higher.

### #1: Refine the Upcoming Comprehensive Review of the Town's Zoning By-Law

Impact: ★★★★★ Cost: \$\$ Timeline: Near-Term

The following are key housing outcomes that should be strongly considered by the Town as the Zoning By-Law review begins:

- **Upzone along arterial roads:** Where it does not exist already, the Town should consider opportunities to upzone along arterial roads where the lot depths and other factors might allow. We understand the new Official Plan is proposing heights up to 8 to 12-storeys in some areas.
- **Eliminate single-family-only zoning:** Eliminating single-family-only zoning is not meant to restrict the construction or existence of single-detached homes, but rather to end zoning that *only* permits this built form. In any residential 'neighbourhood' – even



those that are primarily low-rise homes – semi-detached, townhouses, and multiplex built forms should be permitted as-of-right to increase housing options. The Town of Collingwood should eliminate its R1 zoning category. The R2 category should also be expanded to include, at minimum, permissions for townhouses and denser multiplexes than just duplexes.

- **Allow more density in neighbourhoods:** The Province through Bill 23 has already required that three units be permitted as-of-right on any serviced residential parcel. There is an opportunity to take this further by ensuring medium-density housing types like traditional, back-to-back and stacked townhouses are allowed as-of-right in neighbourhoods, as well as denser multiplex homes like four and six-plexes (e.g. encourage more “missing middle”). Legalizing rooming houses (which could even be used as employee housing) in all residential zones would also be beneficial, as well as other apartment typologies where appropriate. We understand the new Official Plan is proposing heights between 3 and 8-storeys in existing established neighbourhoods to promote intensification and conversion of single unit dwellings to higher density housing types while maintaining character and compatibility.
- **Allow residential development to be integrated into designated commercial areas:** The nature and need for brick-and-mortar retail has changed. Large-format retail plazas are being re-imagined across Ontario to incorporate a mix of residential uses on existing surface parking lots and create more complete communities. The Town of Collingwood should recognize this emerging trend and create a related policy framework that provides flexibility to add housing supply to these commercial properties. Importantly, this would put more housing within walking distance of key commercial amenities. We understand the new Official Plan sets the groundwork for this change in the future by eliminating all stand-alone commercial designations.
- **Eliminate minimum parking requirements:** Parking can add significant costs to apartment developments, particularly if it needs to be located underground. Eliminating minimum parking requirements for mid and high-density developments would allow housing providers to provide parking based on market expectations as

opposed to policy requirements, building only what is needed. We understand that some opponents of no parking minimums are concerned about a potential increase of residents parking on streets. In our view, this is an enforcement issue, not a planning issue.

- **Avoid protecting stability at the expense of new housing:** Unless the proposal is in a heritage district, better balance the preservation of the community with the creation of housing supply through an amended zoning by-law. It is probable that with careful reconsideration, low-density zones could allow for a broader range of more dense housing formats while still protecting the character of the local area. In particular, any future updates to the Town's Urban Design Manual should aim to simplify requirements, focus on aspects of design within the municipality's control, and reinforce those elements that support sustainable development forms.
- **Update other zoning permissions as necessary to accommodate the above changes:** The Town should review the by-law to make any necessary changes related to items like setbacks, building depths, minimum lot sizes, floor space index, and

others to accommodate the noted recommendations.

- **Simplify the Zoning By-Law:** Simplifying the Town's zoning by-law could also have a positive impact on getting more housing supply built, making it easier for prospective housing providers, particularly smaller groups and residents, to get to the construction phase more quickly and/or to increase the number of participants in housing delivery.

**The Town should implement these changes through the Comprehensive Zoning By-Law Review that will take place in 2024.**

**Of note, some of these items, particularly those related to parking reforms, can be advanced more quickly and ahead of the zoning by-law review. It is recommended that these be initiated immediately, if possible.**

## #2: Work Towards a Decision Faster

**Impact:** ★★★★★ **Cost:** \$\$ **Timeline:** Near-Term

The Town of Collingwood should strive to speed up and simplify the development approvals process to increase housing supply. This could in turn reduce the cost of all new residential development without requiring direct subsidies. We understand the Town of Collingwood has embarked on a Development Process and Fees Review and the recommendations in this Master Plan should be provided to the lead consultant for consideration. Recommendations from the Review project have not been confirmed in the Town's budget and investment would be required in 2024 and beyond to implement the desired program enhancements that are currently over and above existing capacity.

The Province's Bill 109 has implemented requirements for specific timelines for decisions related to site plan and zoning applications. Other recent changes also included allowing projects with 10 or fewer units to be exempt from site plan control, with limited exceptions. These items should help to speed up development approvals and have all parties work towards delivering new housing faster.

However, the Town of Collingwood should explore whether there are other ways that they can speed up their own internal processes to spur more construction activity. Designing internal processes to match staffing capacity is a key step in ensuring that those processes are efficient.

In addition to the reforms noted in the previous section, some other steps that may allow the Town to increase the speed at which housing is delivered include, among others:

- Limiting the number of public consultations to only what is required by the Planning Act, particularly for applications that conform with local planning policies. Utilizing existing technology for additional input (e.g. ensuring that public consultations have a hybrid in-person-virtual approach, allowing for comments through the Town's website, etc.), as needed, should be sufficient.
- Streamline the process for low-risk or uncomplicated development applications.
- Streamline the approval of building permits.

- Streamline pre-application meetings to ensure that a decision can be made quickly once an application has been submitted.
- Critically review and consider reducing the number of required studies for certain residential developments.
- Eliminate peer review requirements, where possible, if initial studies are completed by qualified professionals or firms qualified by the Town.
- Improve communication and decision-making between departments to support a more efficient approvals process, primarily through investment in tracking technology as a one-stop shop for all communications and review related activity of a file.

We would also recommend fast-tracking priority projects. In this case, we would recommend that those priority projects either be ones that provide affordable housing for moderate and low-income households, or market-rate purpose-built rental units. This would help speed up the delivery of the housing that is most needed in Collingwood. The Town has made initial process changes that would support this recommendation by assigning the Housing Development Coordinator as a concierge, advocate,

and “one window” contact for affordable housing projects.

The Town is currently completing a Development Process and Fees Review. In addition to the zoning changes, which can have a significant impact on reducing approval timelines, the Town should also investigate the strategies identified here to reduce timelines and increase the speed at which housing can be delivered.

**The Town should investigate these changes through the implementation of the Development Process and Fees Review, which is currently underway and expected to be completed in 2023. The Town should also monitor approval timelines to ensure applications are advancing more quickly through the process as changes are implemented.**

### #3: Enact a Rental Replacement By-Law in Order to Preserve Existing Rental Stock

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Near-term

As identified by the HNA, the Town of Collingwood has seen a decline in its purpose-built rental stock over the past several decades, declining from a high of 782 units in 1991 to just 562 units in 2022. The reason for the decline is that rental demolition and conversion to condominium tenure housing has outpaced the construction of new purpose-built rental housing in Collingwood over the past 30+ years.

Given that many of the older rental buildings in Collingwood provide relatively affordable monthly rents, it would be beneficial for the Town to take action to increase the difficulty at which these units can be removed from the market. One way to do so is with a rental replacement by-law. Section 99.1 of the Municipal Act grants municipalities the authority to regulate or prohibit the demolition or conversion of residential rental properties with six units or more. The City's of Toronto and Mississauga currently have a rental replacement by-law in force.

While the Province's Bill 23 gives the Minister of Municipal Affairs and Housing new powers to impose limits and conditions on municipal authority in this area, it is still worthwhile to implement a rental replacement by-law to avoid further reduction of the already limited rental supply in Collingwood, and to protect existing renters from displacement.

In addition to a rental replacement by-law, creating a more permissive development environment should also help to reduce the pressure to demolish or convert these existing buildings. When housing providers have a wide range of development opportunities, they are less likely to pursue the demolition of multi-unit buildings.

To support landlords in maintaining these buildings in a state of good repair, the Town's Housing Development Coordinator should become familiar with and direct interested parties to funding programs that support the renovation of older rental buildings, such as the Co-Investment Fund Repair and Renewal program offered through the National Housing Strategy.

The Town should investigate a Rental Replacement By-Law in tandem with the Comprehensive Zoning By-Law Review that will take place in 2024. This will also allow time for greater clarity from the Province on some of the proposed changes to the Municipal Act. Staff resourcing may be required beyond what has been estimated for the Zoning By-law Review to draft the by-law.

#### #4: Source Simple Pre-Approved ‘Off the Shelf’ Building Designs

Impact: ★★☆☆ Cost: \$ Timeline: Near-term

As a means of accelerating the development process, reducing costs, and increasing housing supply, the Town of Collingwood should consider creating pre-approved ‘off-the-shelf’ building designs. Builders can then choose from the various designs depending on what type of housing is permitted on a property and construct them as-of-right without having to go through a complex approvals process. Collingwood already provides ‘off-the-shelf’ pre-approved building designs for accessory dwelling units through the Rapid ADU

program. This would represent an expansion of something that Collingwood is already doing.

This ‘off-the-shelf’ design approach has been taken in municipalities elsewhere, primarily for lower-density housing types, and is a similar idea to CMHC’s ‘Victory Homes’ designs that were utilized to build homes for returning veterans after World War 2.

The Town should consider a similar pre-approved ‘off-the-shelf’ approach but adapt it for medium-density building types that are recommended to be permitted across Collingwood. To do so would require hiring an architect to design some simple home designs for a variety of building scales – duplex, triplex, fourplex, sixplex, townhouses, stacked townhouses, and low-rise apartment buildings (3 and 4-storeys).

Simple, modular housing options could even be included to lower the cost of construction and further support our later recommendation on creating an enabling environment for alternative construction techniques. It could also make sense to use some of these designs as the basis for new development on Town-owned lands.



This should be completed in parallel with the Town's Comprehensive Zoning By-Law Review, which will also ensure that the new zoning regulations permit these types of built forms without the need for costly amendments. A financial investment will be required beyond the baseline Zoning By-law Review.

### #5: Shift the Public Discourse Around Growth, Density, and Affordable Housing Through a Public Education Campaign

Impact: ★★☆☆ Cost: \$ Timeline: Near-term

The Town of Collingwood is in need of a paradigm shift in terms of how new development, intensification, and affordable housing is viewed. Through the Comprehensive Zoning By-Law process, significant public consultation is expected to occur, which will begin this process.

Beyond the Zoning review, Town Council and staff should hire a communications / marketing firm to move forward with a new communications strategy / public education campaign with the goal of shifting public

opinion on the importance of increasing housing supply and creating more housing options in the market.

This campaign should have a positive tone, should be utilized to teach residents why new housing investment and growth is beneficial to them, and help to dispel some of the myths around new development. This public education campaign should also be used to push back against local NIMBYism and better inform community members to reduce delays in the approvals process. There is a clear role for the Town's Affordable Housing Task Force in helping to spread the message of the campaign within the Town of Collingwood at a more grassroots level.

Should the funds for a professionally created and delivered campaign not be available, the Town could continue to rely on the Task Force to lead education initiatives and develop a more targeted NIMBY to YIMBY (Yes In My Back Yard) campaign. This Task Force led educational campaign would require alignment with Town communication standards and polices and would therefore require resources, in some form, from Corporate Communications.

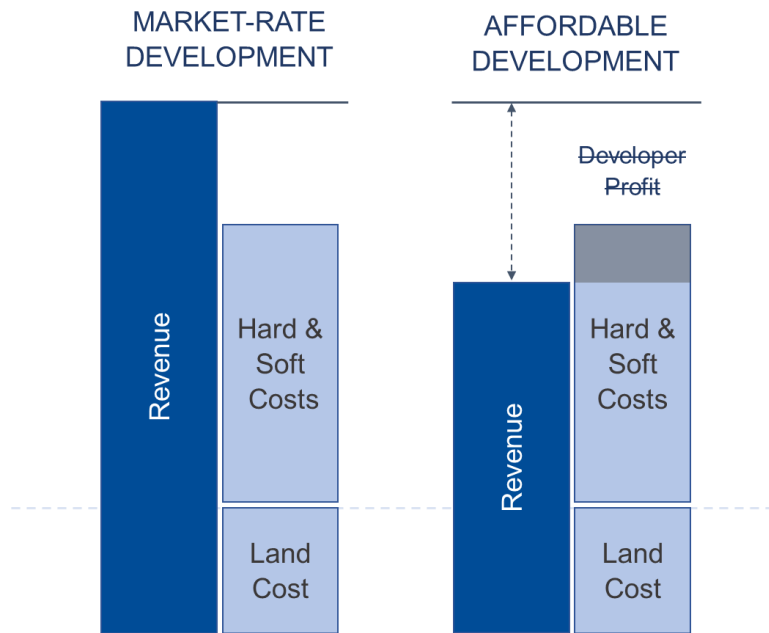
During the Town's Comprehensive Zoning By-Law Review, the Town should hire a marketing firm to undertake this campaign. Such a campaign is likely to cost in the range of \$30,000 - \$50,000 and can come from the Affordable Housing Reserve Fund if a separate funding source cannot be found.

Should those funds not be available, the Town could continue to rely on the Task Force to lead education initiatives and develop a more targeted NIMBY to YIMBY (Yes In My Back Yard) campaign. This Task Force led educational campaign would require alignment with Town communication standards and polices and would therefore require resources, in some form, from Corporate Communications. It would also require collaboration with the Town's Zoning By-Law consultant team.

## 6.4 Financial Approaches

There is no business case for the private sector to build affordable housing on their own. The revenues associated with affordable rental or ownership prices are not sufficient to cover the costs of new development while also providing the developer with a reasonable return (**Figure 10**). Non-profits do not require a return, but they struggle to secure the financing and equity needed for an affordable housing project to advance. Both groups will require subsidy from government to advance affordable housing.

**Figure 10: Affordable Housing Example**



While simplifying and speeding up the development process, as recommended in the previous section, is one way to reduce development costs in a more indirect way and for all types of housing, there are also options for the Town of Collingwood to more directly subsidize new development that achieves municipal priorities.

The Town of Collingwood should aim to reduce the cost of development using development incentives (e.g., capital subsidy, property tax breaks, free/discounted

land, etc.) to encourage private sector and non-profit developers to participate in the delivery of affordable and market-rate rental housing. Affordable housing should be the highest priority for incentives, but market-rate purpose-built rental development should also be considered as a secondary priority given the limited new investment occurring in Collingwood. Combining both objectives (i.e., mixed-income development) that includes both affordable and market rental housing on public lands would be an effective strategy that also reduces the amount of subsidy that might be required.

Notwithstanding the above, it must be identified that subsidizing affordable housing is expensive. Most programs offer incentives in the range of \$85,000 - \$300,000 per unit for moderately affordable housing between 80% and 120% of Average Market Rent ('AMR'). The affordability range for moderate-income households in Collingwood ranges from 95% - 140% of AMR. While the Town will be required to waive development charges, parkland fees, and community benefit charges for housing below 80% AMR when recent changes through Bill 23 come into effect (unless the definition of "affordable housing" under the Development Charges Act is amended), in addition to senior government waiving of HST on new rental

investment, significant subsidies remain for new housing that is affordable for moderate-income households to be viable.

It is therefore paramount that should the Town wish to implement an incentive program as recommended in this Master Plan, Council find ways to increase the annual affordable housing budget, while also leveraging increased funding and support from Simcoe County and other levels of government. It is important to identify that Simcoe County is also advancing an Attainable Housing Action Plan that is also focusing on strategies to meet the needs of moderate-income households.

Any incentive program implemented through this AHMP should align with and have the capacity to easily stack with funding that might be made available through the County. It is also important that the Town coordinate funding and financing through the National Housing Strategy programs that provide grants and lower cost financing to affordable rental housing projects. Coordination efforts can include educating interested parties on funding programs, identifying how local and County initiatives can stack with other programs available, and help applicants apply to programs where necessary/appropriate.

## #6: Create a Municipal Capital Facility By-Law

Impact: ★★★★★ Cost: \$\$\$ Timeline: **Medium-term**

We recommend that the Town create a Municipal Capital Facility By-Law ('MCFB') under Section 110(9) of the Municipal Act. A MCFB is almost identical to a Community Improvement Plan (CIP) but has additional flexibility and is easier to implement. Many communities have been using a MCFB over a CIP for this reason, and there are no identified challenges of using a MCFB over a CIP. A MCFB allows both the Town and the County to offer a range of incentives to the private and non-profit development community in exchange for affordable housing. Incentives can include:

- Capital grant (i.e., not tied to any fee or charge);
- Grants tied to specific fees and charges (e.g., development charges, planning applications fees, building permits, parkland fees, etc.);
- Low-cost or forgivable loans;
- Tax Increment Equivalency Grants for property taxes (TIEG);

- Public land at discounted or no cost;
- Exemption or reduction from property taxes; and
- Exemption or reduction from development charges.

To enact a MCFB, a municipality must define affordable housing, define the eligibility requirements, including references to current acts and legislation, prepare a summary of the provisions that agreements must contain, and other language as required by the Act. The approval or amendment of the by-law requires Council endorsement but does not carry appeal rights or consultation requirements and can therefore be enacted more quickly than a Community Improvement Plan under the Planning Act.

Once the by-law is enacted, a municipality can then enter into individual agreements, referred to as Municipal Capital Facility Agreements, with selected projects. These agreements will explicitly characterize the project, if the project is meeting or exceeding the definition of affordable housing in the by-law, detail the incentives being offered, and other similar items. An agreement with the development, including the number of units, length/depth of affordability, and other conditions are registered against the title of the property. Through annual reporting to the municipality,

if a project does not comply with these requirements, the owner will pay back the prorated incentive provided. This ensures compliance, over the long-term, with any conditions placed on the provision of municipal funding.

The implementation of the overarching MCFB will therefore enable the Town to offer incentives, including low or no-cost public land, in exchange for affordable housing. It is recommended that the Town implement the MCFB, regardless of the budget or staffing resources made available.

Given the limited financial resources currently available, flexibility in both program structure and implementation will be important:

- Affordable housing should be defined based on the needs in the HNA, but also include flexibility to ensure the by-law does not require constant updates. It should also include both affordable ownership and rental, allowing flexibility to incentivize outcomes as opportunities become available:
  - Affordable Rental Housing: Housing Units offered for rent, for which the monthly rent is at or below 170% of the Average Market Rent ('AMR') as determined by CMHC each year for

the Town of Collingwood for a period of no less than 20-years<sup>2</sup>.

- Affordable Ownership Housing: Housing units offered for sale by Affordable Non-Profit groups serving moderate income households.
- The above definitions will allow the Town to incent a wide variety of outcomes, including affordable ownership non-profit groups such as Habitat for Humanity, Options for Homes, Trillium Housing, and others. While 140% of AMR is the current benchmark affordable to groups in the 6<sup>th</sup> income decile in Collingwood, including a higher benchmark in the overarching MCFB will allow the Town to incentivize market-rate rental as well as mixed-income projects, if desired.
- The by-law should also permit the Town to use, at their discretion, all of the incentives available under the Act.
- In addition to creating new housing, the by-law should also allow the Town to offer incentives, and

particularly property tax abatements, to assist non-profit groups with the acquisition of existing older apartment buildings as a means of protecting older and relatively affordable rental supply from being gentrified.

- A sample MCFB is provided in **Appendix C** of this report. As the Town looks to implement a MCFB, this by-law should be refined in consultation with Simcoe County and Town legal. Agreements that are registered on the title of land should also be created by the Town's legal staff.

Having a MCFB in place will allow the Town to offer financial incentives, including discounted or free land (see following sub-section of this report) as opportunities arise and program budget allows. Should Simcoe County advance a similar program, the Town could either allocate budget to the County program or offer incentives through their MCFB, which can stack efficiently with any County MCFB or CIP.

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<sup>2</sup> 170% of AMR, as defined by CMHC, represents market or near market rental housing. Setting a high baseline eligibility criterion allows the municipality to be flexible, incent both affordable and market rate housing if desired, enables the incentivizing of mixed-income development on public land, and provides enough flexibility that the by-law should not need updating. It does not prevent the municipality from only incenting more deeply affordable housing. Similar benchmarks have been used in both Peel and York Region. The affordability benchmark of Moderate Income Households in Collingwood related to approximately 95% - 140% of AMR.

In terms of establishing a program structure, the following is recommended.

### **Option 1: Current Annual Budget Contribution to the Affordable Housing Reserve Fund is Maintained**

- The Town does not currently have a sufficient budget, or staffing resources, to justify a formal incentive program with a defined application and approval process.
- As such, the Town should advance the MCFB recommended in this AHMP and seek to partner with Simcoe County. If the County advances their own incentive program, the Town can use the MCFB to offer additional financial assistance to projects selected by the County that are within the Town of Collingwood. Participation in a County-led program will largely eliminate the administrative burden to the Town of operating their own program, while also improving the available budget and funding available.
- If Simcoe County does not advance an incentive program, the Town should create a webpage that highlights the MCFB and the depth of affordability

that is eligible for incentives. The Town's Housing Development Coordinator can then respond to inquiries and recommend to Council that incentives be provided to identified projects if budget is available and the project aligns with municipal objectives / this AHMP. These conversations can also advance through the Housing Development Coordinator's role in the concierge program.

- In addition to offering free and discounted land, the Town can also use the MCFB to stack financial incentives to secure housing outcomes, which will likely be necessary in addition to funding from Simcoe County and other levels of government.

### **Option 2: Budget is Increased to \$3M or More Annually**

- If a larger annual budget can be secured, the Town can consider advancing a more formal incentive program where developers apply, and applications are reviewed and approved by Town staff based on criteria approved by Council or on a first-come, first-served basis through a time limited application window. Funding can then be allocated to projects that are approved through the application process.



- With this more substantial budget, which might create around 30 units annually assuming an average subsidy of \$100,000 per unit, creating a formal incentive program with a defined application process would allow for the efficient review and approval of applications<sup>3</sup>.
  - To undertake the above, the Town will require additional staff with expertise in affordable housing, development economics, and real estate analysis.
  - The Town will also need to allocate staff resources or hire a consultant to prepare a program webpage, program description, application forms, and application review criteria.
- Without this more substantial budget, creating this formal incentive program is likely to only 'lock-in' valuable budgetary resources with very little up-take.

**The MCFB should be created and implemented upon approval of this AHMP. The Program's structure should be determined once the Town's budget is confirmed, and the Simcoe County Housing Attainable Supply Action Plan is approved.**

## #7: Use Public Land to Deliver New Affordable Housing

**Impact:** ★★★★★ **Cost:** \$\$\$ **Timeline:** Medium-term

Like incentives, no-cost or low-cost land is a way to subsidize the development of new affordable housing and can have a significant impact on project affordability, but also has a significant financial impact on the Town by essentially negating any future revenues from the sale of the lands.

<sup>3</sup> Examples of current best practice programs include:

The Region of Peel: <https://www.peelregion.ca/housing/development/affordable-housing-incentives/program-details/>

City of Toronto: <https://www.toronto.ca/community-people/community-partners/housing-partners/housing-initiatives/open-door-affordable-housing-program/>

Region of Durham: <https://www.durham.ca/en/regional-government/regional-incentives.aspx#AHIP>

The Town of Collingwood should utilize Town-owned land for new affordable housing or mixed affordable and market-rate housing as a means of lowering the cost of delivery and retaining a measure of control over development outcomes.

It is not recommended that the Town either develop the sites on their own or own/operate the affordable units. Rather the Town should leverage the expertise in the private and non-profit sectors, or alternatively Simcoe County as service manager, to select the developer and long-term owner/operator partners through the process described to follow.

The Town's Affordable Housing Task Force has already short-listed three Town-owned properties for new affordable housing development, with Council having resolved to recognize and champion the Task Force's recommendations for the properties in March 2023 and to ensure that Official Plan designations on those properties are appropriate to support higher density, mixed use development.

While the Town and Simcoe County has already conducted a portfolio review of public lands to identify additional properties that can be made available, this should be done periodically to create a 'pipeline' of

properties that can be used for affordable housing. In addition to these properties, the Town should consider acquiring other surplus institutional properties such as surplus school or church sites as they become available, or alternatively supporting non-profits and other groups to acquire these lands for new affordable housing delivery. Lastly, any Town project related to other municipal land needs or uses such as an Arts Centre or Multi Use Recreational Facility should consider the integration of affordable housing within those projects where possible.

As will be explored to follow, considerable costs and resources can be encountered when disposing of public land in exchange for affordable housing. Like the incentive program, the following options are provided:

### **Option 1: Current Annual Budget for Affordable Housing Initiatives is Maintained**

Simcoe County is issuing a call for land later in 2023. Given the limited budget available, the Town should transfer lands to Simcoe County, who would undertake the disposition process. This could be an attractive option given that Simcoe County has larger resources than the Town and has significant experience carrying

out these processes in their role as Service Manager. Simcoe may also build on these lands directly with affordable or mixed-income rental housing.

While the Town may lose some control over project outcomes and timing, this would be an effective strategy to transfer much of the anticipated administrative and financial burden to Simcoe County while enabling Town staff to focus on other priorities identified in the Plan.

### **Option 2: Budget is Increased to \$3M or More**

With an increased budget, the Town could allocate more resources (including the additional staff member identified previously) to undertaking the land disposition process internally. Alternatively, the Town can transfer lands to Simcoe County, while directing more funds to the incentive program.

The following process is recommended for any future Town-owned property being used for new affordable housing development:

- Create certainty in development entitlements and maximize achievable density on the property.

- Maximize the number of affordable housing units that can be delivered by remaining open to mixed-income developments as a means of subsidizing the affordable housing units.
- Set preliminary criteria related to depth of affordability, length of affordability, and target income groups. These criteria should be refined as analysis is undertaken on the site and funding requirements are better understood.
- Prioritize rental tenure development over ownership. A mixed-income rental tenure development could provide the benefit of delivering two types of housing that are currently in short supply in Collingwood.
- Notwithstanding the above, some sites may be appropriate for non-profit affordable ownership groups such as Habitat for Humanity, particularly if properties are likely to only accommodate lower-density housing types.
- Offer the property without cost, or at below market value. It is not recommended that Town-owned lands be sold at full market value, later reinvesting proceeds into other incentives/priorities, unless there is a clear rationale that will allow for the delivery of more affordable units. It is also not

recommended that the Town retain ownership and operation of the affordable housing developments, as this can be more efficiently and effectively provided by a not-for-profit, private housing operator, or Simcoe County as Service Manager.

- The Town can also investigate the possibility of a low-cost land lease option rather than disposition; however, this must be evaluated through a proforma and economic analysis to ensure the economics are aligned with project feasibility.
- Be open to creative solutions around construction techniques, building design, and housing models that can reduce the cost of development on Town-owned land, support more affordable housing delivery, and support the Town's housing needs and priorities.
- Identify partners to not only develop the housing, but also operate any affordable housing units after construction is completed.

To ensure transparency and that the best project with the largest number of affordable units, greatest affordability depth, best value for money, or meeting other community benefit criteria is selected, for any site identified for new affordable housing, the Town should

undertake a Request for Expression of Interest ('RFEOI') and Request for Proposal ('RFP') process to select a development partner. While a RFEOI may not be necessary for every property, it helps the Town understand interest in the property, the availability of partners and funding, and if preliminary expectations / requirements need to be adjusted.

### **Disposition Preparation:**

- Identification of property to be offered in exchange for affordable housing.
- Initial due diligence on the property to uncover any known issues.
- Preparation of an initial concept plan for the property, including an initial list of minimum required criteria related to number of affordable units, affordability depth and length, tenure, and other similar items.
- The Town should advance planning approvals if required and recommended by the Town's project team.
- Investigation into the value of the land relative to the requested affordability through proforma and economic modelling. Land lease vs land sale can

also be investigated at this time. This analysis should also determine whether additional incentives/ funding in addition to discounted/free land is required for a project to advance.

- If it is not already in place, it is recommended that the Town establish a Vendor of Record roster of required expertise including planners, architects, financial experts, and a firm experienced in disposition and proposal call management. This will allow the Town to retain a team quickly to evaluate these issues as sites become available.
- While every site is different, this roster of site development expertise may require between \$50,000 and \$125,000 or more per property.
- Prepare required RFEOI and RFP documents with a careful evaluation of potential risks and mitigation strategies thereof. Retain a process advisor and solicitor or assemble an internal team with appropriate skillsets to execute the proposal call.

### **In-Market: Two-Stage RFEOI and RFP Process:**

- Issue an expression of interest to the development and non-profit community to gauge interest in the site and begin an initial ground truthing of the property and the requested affordability component. This could also be used to evaluate the capacity and track record of potential proponents and to shortlist groups for a subsequent stage of a disposition process.
- The Town should begin initial conversations with CMHC around financing and funding through the National Housing Strategy, as well as discussions with Simcoe County around funding availability and resources they could provide.
- The Town would then initiate an RFP process and allow groups to compete for the property, including both a developer and operator of the affordable units. Evaluation criteria should be established to evaluate proposals as they come in. The RFP process could be structured in a manner that incents proponent performance by measuring key performance metrics like the number of affordable units, desired mix of unit types, depth, and duration of affordability, among others.

Once the approach to Town-owned land is confirmed, the Town should act on at least one of the identified properties immediately, once resources to run the project are secured. This includes either transferring identified sites to Simcoe County or retaining a roster of experts and carrying out the identified disposition process.

The Town should also begin to work with other community partners to identify lands available within the municipality immediately (e.g. school board, churches, private donors, etc.).

## #8: Expand the Rapid ADU Program to Include More Options

Impact: ★★ Cost: \$\$ Timeline: Near-term

The Town of Collingwood's existing Rapid ADU ('Accessory Dwelling Unit') Deployment Program – along with the additional financial incentives provided through Simcoe County's Second Suites Program – has successfully led to the creation of a number of new secondary suites with relatively affordable rental rates.

It is recommended that the Town of Collingwood consider expanding the Rapid ADU program to include more options, particularly in consideration of the survey results which indicate that 40% of respondents would have their housing needs met by ADUs. It was noted during stakeholder engagement that there are properties within the Downtown, in particular, that have upper levels that are sitting vacant or underutilized and could otherwise be used as residential units. It is therefore recommended that the owners of these properties be able to access funding through the Rapid ADU program if they wish to convert the upper level of their buildings to residential, or to make any necessary renovations to improve these spaces as residential opportunities in the community. These incentives can either be offered through the Town's existing ADU program, through modest modification, or through the MCFB recommended for implementation.

We would also recommend lobbying Simcoe County to extend the eligibility of their funding to match any expansion of the Town's program to improve effectiveness and potential take-up.

**The Town should implement these changes upon approval of the AHMP.**

## 6.5 Coordination Initiatives

For several decades, all levels of government have generally left the delivery of new housing up to the private market. This needs to change as municipalities and other levels of government seek to solve the affordable housing crisis. While the Town of Collingwood may not have the ability or resources to construct a significant amount of new housing on their own, they can take a coordinator or leadership role in the delivery of new housing.

The recommended coordination initiatives are not as impactful as planning reform and development incentives but are nonetheless still important for the Town of Collingwood to consider as part of the AHMP.

Our recommendations for coordination initiatives as part of the AHMP include:

- **#9: Expand the Existing Concierge Program to Connect Parties Who are Interested in Partnering to Deliver New Housing:** There are

several different parties in any housing market who are interested in participating in the delivery of new housing. However, there are few mechanisms to easily connect these parties, particularly those that may not have sophisticated operations or experience. The Town of Collingwood should expand the existing ‘concierge’ program whereby interested parties – those with equity/capital, landowners, developers, or others – that otherwise may not cross paths, can be connected to help deliver more housing, both affordable and market-rate. The Town’s Housing Development Coordinator should undertake this role.

**Impact:** ★★★★★ **Cost:** \$ **Timeline:** Near-term

- **#10: Explore the Potential for Density Bonusing for Priority Projects:** The Town of Collingwood should explore ways to incorporate density bonusing for priority projects or to achieve specific housing outcomes. For example, it could be beneficial if the Town could provide additional height or density to a project if a certain percentage of the additional units gained were priced within a particular range of affordability. While density bonusing was removed as a statutory option under the Planning Act, there may be other tools available to achieve the same



goals, such as through the Community Planning Permit System or Community Benefits Charges. Legal advice is required prior to action on this recommendation.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Medium-term

- **#11: Pursue Economies of Scale by Partnering with Other Municipalities:** Recommendations like the expanded concierge program and 'off-the-shelf' building designs could benefit from economies of scale if several municipalities come together to work on the initiative together as partners. These types of items could also benefit from the County taking a leadership role and overseeing these programs, partnerships, or services. This could be accomplished within the existing mandate of the Housing Development Coordinator to explore and foster partnerships.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Medium-term

- **#12: Treat the Private and Non-Profit Sectors as Partners:** Partnerships are going to be a key part of the successful execution of the recommendations in this Master Plan and of the delivery of new

affordable and market-rate housing in Collingwood. The Town is going to need to lean on a wide variety of partners in the coming years ranging from private sector developers, non-profit organizations, housing operators, other local municipalities, and other levels of government. Speeding up the approval process, combatting NIMBYism, advancing market based as-of-right zoning efforts, implementing the expanded concierge program, working with the development community on incentive programs and public land, and other recommendations in this plan will all advance this effort.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Immediate

- **#13: Be Encouraging of Non-Traditional Construction Techniques, Housing Tenures, and Funding Models:** The Town of Collingwood should create an environment that is welcoming to creative ideas related to construction techniques, housing types, building designs, funding models and other elements of the development process. In many cases, there are emerging options that can reduce costs and construction timelines relative to more traditional developments. Though no specific barriers to these innovative housing forms have been identified, there is an opportunity to utilize

some of these creative options on Town-owned land or to create pilot programs that put the Town of Collingwood at the leading edge of some of these emerging alternatives.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Immediate

- **#14: Ensure the Town of Collingwood has Robust Data Collection to Support Good Decision-Making:** The Town of Collingwood should ensure that their data collection efforts are robust moving forward to help make more informed decisions around housing and to have a better grasp on current and historical market conditions. Recommendations are provided in Section 7.0 on collecting market data for the purpose of monitoring the AHMP. Depending on the type of data, the assistance of an outside expert consultant may be required.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Near-term

- **#15: Consider Housing Above or in Conjunction with New Public / Community Facilities:** This would add density in proximity to important community amenities, in addition to using public lands more effectively and efficiently.

**Impact:** ★★☆☆ **Cost:** \$\$\$ **Timeline:** Immediate

- **#16: Explore Alternative Revenue Tools:** Property taxes provide the highest potential for raising revenue to allocate towards development incentives, though most municipalities are likely to prefer to look elsewhere to reduce the burden on the property tax base. Given this, we would recommend exploring the limited number of other revenue tools that are available to municipalities as a means of raising revenues that can be used towards housing outcomes. This could include a municipal accommodation tax, vacant homes tax, ridesharing fees, landfill levy, or licensing fees (e.g. for short-term rentals).

While these tools should be explored, it will be important to consider that their potential to raise significant revenues will be limited compared to property taxes. In some cases, administrative costs may outweigh the revenue that is collected. We note later in our recommendations that the Town should advocate to the Province for additional revenue tool options.

**Impact:** ★★☆☆ **Cost:** \$\$ **Timeline:** Medium-Term

## 6.6 Advocacy Initiatives

The Town of Collingwood has limited resources to deal with the growing shortage of affordable housing and can only do so much on their own. More active participation from the Provincial and Federal governments will be required moving forward to have a more significant and lasting impact, particularly when it comes to subsidizing new affordable housing development. As such, the Town of Collingwood should be advocating to other levels of government for help in solving their affordability issues, ideally with targeted requests.

Notwithstanding this, advocacy alone will not be enough. The Town of Collingwood needs to undertake the changes that are within its own control prior to or in tandem with this advocacy work. It will be important for the Town to do as much as they can on their own to demonstrate to other levels of government that they have ‘skin in the game’.

Our recommendations for advocacy initiatives as part of the AHMP include:

- **#17: Advocate for the Elimination or Deferral of HST on New Purpose-Built Rental Developments:** While in a condominium apartment,

the developer can pass HST off to individual buyers in the purchase price of a unit, the developer is the one who has to pay the HST for a new purpose-built rental development. This adds significant cost to the purpose-built rental development and the difference in cost is one of the reasons that most new apartment development in Ontario is condominium tenure. Advocacy by the Town on this front has already started in response to the Minister of Municipal Affairs and Housing to prioritize the recommendations of the Province’s Housing Affordability Task Force report.

As of the writing of this report, the Federal government has announced that the Federal portion (GST) of HST will be waived for new rental housing. While the Province has noted their intention to waive the Provincial portion (PST), a formal announcement has not yet been made.

**Impact:** ★★★★★ **Cost:** \$ **Timeline:** Near-term

- **#18: Advocate for More Revenue Tools to Reduce the Burden on the Tax Base:** The revenue tools currently available to the Town of Collingwood are limited, requiring an over-reliance on the

property tax base. The Town of Collingwood should advocate to the Province of Ontario for greater flexibility in how they collect revenues to pay for municipal priorities like affordable housing. Specific suggestions are provided in the Strategic Direction Options Report in Appendix B.

**Impact:** ★★★★★ **Cost:** \$ **Timeline:** **Medium/Long**

- **#19: Advocate for the County to Participate in any Local Incentive Programs:** As the Town of Collingwood pursues a MCFB to implement new incentives for housing providers, we recommend advocating to the County to participate in any new incentive programs. Alternatively, the Town may advocate that the County take the lead on an incentive and land program, with Collingwood participating in a County-led program. As the County advanced their own Attainable Housing Supply Action Plan, the time for advocacy is now.

**Impact:** ★★★★★ **Cost:** \$ **Timeline:** **Medium-term**

- **#20: Advocate to CMHC for More Streamlined Access to Funding and Financing Programs:** We have heard time and again about the challenges for

housing providers in accessing CMHC's funding and financing programs. We would recommend that the Town of Collingwood advocate CMHC and the Federal government to create a more streamlined process to access these funding and financing programs for these groups to more easily access low-cost financing to create new affordable and market-rate rental housing.

**Impact:** ★★★★★ **Cost:** \$ **Timeline:** **Long-term**

- **#21: Ask the Province to Define Affordable and Attainable Housing and Incentivize Both:** Currently, there is no definition in Ontario for attainable housing and there are evolving or inconsistent definitions of affordable housing. The Town of Collingwood should advocate for the Province to bring forth a clear and income-based definition of attainable housing relative to affordable housing to be reflected consistently across legislation and policy in Ontario, and then request that the Province provides funding to incentivize it, either through new programs or existing ones. Advocacy by the Town on this front has already started in response to the Minister of Municipal Affairs and Housing to prioritize the recommendations of the Province's Housing

Affordability Task Force report. Included in the correspondence was a further request to provide municipalities with more tools to compel the delivery of affordable units by the private sector through inclusionary zoning or similar mechanisms.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** **Near/Medium-term**

- **#22: Advocate for Increased Labour Supply for New Development:** A shortage of construction and skilled trade labour is a key factor contributing to the housing shortage. While this issue has been identified at other levels of government, we would recommend continuing to advocate to the Provincial and Federal governments to remedy the labour shortage issue.

Some initiatives to increase the labour supply for these jobs could be for the Federal government to prioritize applications from immigrants who have relevant work experience, increase the number of foreign workers and other non-permanent residents that are being attracted to Canada to work in the construction industry, and encourage more young people domestically to attend College and enter skilled trades. Advocacy on this front has also been initiated by the Town in response to the Minister of

Municipal Affairs and Housing to prioritize the recommendations of the Province's Housing Affordability Task Force report.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** **Long-term**

- **#23: Request Targeted Funding Where it is Not Currently Available:** Where it is not currently available, advocate for direct, targeted funding for priority projects such as new infrastructure to support increased housing development.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** **Medium/Long**

- **#24: Advocate for More Progressive Property Taxation Options:** The Town should consider advocating to the Province for permission to take a more progressive approach to property taxation such as taxation based on housing type or an approach like income tax whereby the mill rate increases incrementally at different values. This would create a fairer property tax system.

**Impact:** ★★☆☆ **Cost:** \$\$ **Timeline:** **Long-term**

- **#25: Leverage the Collective Power of Municipalities in Advocacy:** On its own, Collingwood does not yield significant power. However, the issues that Collingwood faces from a

housing perspective are common across many municipalities in Ontario and throughout Canada.

Leveraging the collective power of municipalities who are seeking similar outcomes from other levels of government would be more impactful than attempting to go it alone, such as advocacy through the Association of Municipalities of Ontario, the Federation of Canadian Municipalities, professional organizations (e.g. OPPI, OBOA, etc.), or collective responses (e.g. Simcoe County Planning Directors letters related to Bills 109 and 23).

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Long-term

**#26: Advocate for the Use of Inclusionary Zoning:** While a municipality may set targets in their Official Plan for affordable housing, this alone cannot be enforced. Inclusionary Zoning (IZ) allows a municipality to require a developer to provide affordable housing in new development, but can only be implemented in Protected Major Transit Stations, which Collingwood does not currently have. Many communities are currently asking the Province to shift this geographical constraint. Advocacy on this front has also been initiated by the Town in response to the Minister of Municipal Affairs and Housing to prioritize the recommendations of

the Province's Housing Affordability Task Force report.

**Impact:** ★★☆☆ **Cost:** \$ **Timeline:** Long-term

## 6.7 Summary of Recommended Actions within the Context of Staff and Budgetary Resources

**Table 5** on page 49 includes a summary of the action items presented in the sections above. As identified, it is not possible to proceed with a robust incentive and public land program without increased financial and staffing investments. The following offers guidance as to how the Town might proceed depending on the budget and staffing provided.

### 6.7.1 Maintain Current Budget (~\$350,000 Annual Commitment)

Referring to **Table 5**, budget and staffing resource limitations are not anticipated to affect the implementation of any of the Coordination or Advocacy initiatives. The Housing Development Coordinator will continue in their role through the expanded concierge program. The remaining initiatives will either be small one-time or annual efforts to be undertaken by the Housing Development Coordinator or other staff.



The recommended Policy, Process, and Regulatory changes will largely be implemented through ongoing (i.e., Development Process and Fees Review) or planned and budgeted (i.e., Comprehensive Zoning Review) processes. Some of the recommendations stemming from this AHMP may result in higher study/consultant fees and/or a longer timeline for these processes to complete. It is not recommended that any budget impacts resulting from the need for additional consulting fees or prolonged timelines come from the Affordable Housing Reserve Fund.

The Public Education Campaign (item 5 in **Table 5**) will however require additional budget to hire a marketing firm, which can be taken from the Affordable Housing Reserve Fund if necessary and implemented under the guidance of the Housing Development Coordinator and in consultation with the Affordable Housing Task Force. The cost of this item is estimated within Section 6.3 (\$30,000 - \$50,000).

The Financial Approaches identified in this AHMP are both expensive to implement and will require resources beyond the Town's Housing Development Coordinator. While the recommendations to expand the existing Rapid ADU Development Program can be activated

without impacts to budget or staff, the incentive program and public land initiative cannot.

Without an increased budget, it is recommended that the Town implement the MCFB and seek to partner with Simcoe County on both an incentive and public land program.

Where budget is not used, this fund should be allowed to accumulate over time and be deployed strategically as opportunities arise. It is also recommended that the Town review the Rapid ADU Development Program over time to understand if current grant amounts are sufficient to achieve desired outcomes, with this program continuing to be funded through the Affordable Housing Reserve Fund.

The Town should prioritize the following items with existing budget and staff levels:

- All of the Policy, Process, and Regulatory changes, which are either currently underway or expected to begin shortly.
- Expand the concierge program.
- Implement the MCFB.



- Coordinate with Simcoe County on a shared incentive program. Also coordinate with the County on their call for land program and/or determine the path forward for the Town's identified public land.
- Expand the Rapid ADU Program.
- Implement the remaining coordination initiatives identified.
- Begin advancing the advocacy initiatives that represent smaller commitments from staff that should be advanced incrementally as appropriate and as resources permit.

#### **6.7.2 Increase Current Budget (Minimum \$1.0 - \$3.0M Annual Commitment)**

If a larger budget can be secured, the Town should create a formal incentive program where developers apply and are reviewed by staff through a formal

process. Further, the Town could also lead due diligence and disposition efforts on identified public sites that will accommodate new affordable housing.

The Town should also hire an additional staff member to run these processes. This new hire will ideally have expertise in affordable housing, development economics, and real estate analysis. In addition to this new staff hire, a committee of Town staff should be created that includes individuals from a broad range of departments to review applications for incentives and public land.

With an increased budget and additional staff, the Town should seek to implement all of the strategies identified in the AHMP.

**Table 5**

<b>Recommended Approach</b>				
<b>Town of Collingwood Affordable Housing Master Plan</b>				
		<b>Maintain Existing Budget (~\$350k)</b>	<b>Increase Budget to \$3M annually</b>	<b>Funding to Come from Affordable Housing Reserve</b>
<b>Recommended Policy, Process, and Regulatory Changes</b>				
1	Refine the Upcoming Comprehensive Review of the Town’s Zoning By-Law	✓	✓	NO
2	Work Towards a Decision Faster (Shorten Approvals Timelines)			
3	Enact a Rental Replacement By-law in Order to Preserve Existing Rental Stock			
4	Source Simple Pre-Approved ‘Off-the-Shelf’ Building Designs			
5	Shift the Public Discourse Around Growth, Density, and Affordable Housing Through a Public Education Campaign			YES
<b>Recommended Financial Approaches</b>				
Create a Municipal Capital Facility By-law to Offer Incentives for Targeted Projects				
6	<i>Option 1: Implement a MCFB and Utilize Together with Simcoe County / As Opportunities Arise</i>	✓	✓	YES
	<i>Option 2: Implement a MCFB and a Formal Town-Led Incentive Program</i>	✗	✓	YES
Use Public Land to Deliver New Affordable Housing				
7	<i>Option 1: Transfer Lands to Simcoe County for New Affordable Housing</i>	✓	✓	YES
	<i>Option 2: Town Undertakes Own Internal Disposition Process</i>	✗	✓	YES
8	Expand the Rapid ADU Program to Include More Options	✓	✓	YES
<b>Recommended Coordination Initiatives</b>				
9	Expand the Existing Concierge Program to Connect Parties Who are Interested in Partnering to Deliver New Housing	✓	✓	NO
10	Explore the Potential for Density Bonusing for Priority Projects			NO
11	Pursue Economies of Scale by Partnering with Other Municipalities			NO
12	Treat the Private and Non-Profit Sectors as Partners			NO
13	Be Encouraging of Non-Traditional Construction Techniques, Housing Tenures, and Funding Models			NO
14	Ensure the Town of Collingwood has Robust Data Collection to Support Good Decision-Making			NO
15	Consider Housing Above or in Conjunction with New Public / Community Facilities			NO
16	Explore Alternative Revenue Tools			NO
<b>Recommended Advocacy Initiatives</b>				
17	Advocate for the Elimination or Deferral of HST on New Purpose-Built Rental Developments	✓	✓	NO
18	Advocate for More Revenue Tools to Reduce the Burden on the Tax Base			NO
19	Advocate for the County to Participate in any Local Incentive Programs			NO
20	Advocate to CMHC for More Streamlined Access to Funding and Financing Programs			NO
21	Ask the Province to Define Attainable Housing and Incentivize It			NO
22	Advocate for Increased Labour Supply for New Development			NO
23	Request Targeted Funding Where it is Not Currently Available			NO
24	Advocate for More Progressive Property Taxation Options			NO
25	Leverage the Collective Power of Municipalities in Advocacy			NO
26	Advocate for the Use of Inclusionary Zoning			NO

This AHMP is a snapshot in time and will require consistent monitoring by the Town. As with any long-term strategy, a wide variety of market, policy, funding, political, and other shifts will undoubtedly require changes in direction as the Plan evolves.

It is also important that the Town monitor the effectiveness of budget amounts and the recommended strategies themselves to ensure they are achieving desired outcomes. If outcomes are not being achieved, the Town must uncover the factors limiting success and recommend changes for Council to consider.

Town staff should report to Council every year on the implementation of the AHMP. It is recommended that the Town report to Council in two ways: 1) overall housing market indicators, and 2) progress and monitoring of specific strategies.

The first group of reporting metrics should include market indicators that illustrate to Council whether market affordability is improving or worsening. This is preferred over the selection of an arbitrary housing target, which would become out of date within a year of this AHMP being approved. Recommended indicators include:

- Number of housing starts and mix of housing units by type relative to the Town's forecasted growth documented in the Official Plan.
- Changes in the rental housing universe to understand if more rental housing is being delivered as follows:
  - % change in the rental vacancy rate.
  - % change in the average market rent.
  - % change in the average resale price in Collingwood.
  - # of affordable ownership units created

The second group of reporting metrics should include monitoring of specific strategies recommended through this AHMP. Monitoring will include different measures, depending on the initiative in question. Examples include:

- Once the zoning update has taken place, the Town should be monitoring how much intensification is occurring, the number of second suites created, the number of multi-unit buildings, etc. Where targeted outcomes are not being achieved, investigation should occur to uncover whether the limiting factor is the regulatory regime (i.e., zoning standards are

- limiting) or the outcome is not economical and may require subsidy. Recommendations to Council on recommended changes should then occur.
- Review of take-up in the incentive and public land program, with specific recommendations to Council to improve effectiveness if required, through increased funding or other measures.

A template of a sample monitoring report is provided in **Appendix D**.

# Appendix A – Housing Needs Assessment

Provided under separate cover.

# Appendix B – Strategic Direction Options Report

Provided under separate cover.

## THE TOWN OF COLLINGWOOD

### BY-LAW NUMBER xx-xxxx

A by-law to govern the provision of municipal housing project facilities

NOW THEREFORE, Council enacts as follows:

#### **Affordable Housing**

1. Affordable Housing for the purpose of this By-law and all Municipal Housing Project Facility agreements means either of:
  - a. Affordable Rental Housing: Housing Units offered for rent, for which the monthly rent is at or below 170% of the Average Market Rent ('AMR') as determined by CMHC each year for the Town of Collingwood.
  - b. Affordable Ownership Housing: Housing units offered for sale by Affordable Non-Profit groups serving moderate income households.
  - c. Existing Affordable Housing: Existing purpose-built rental housing in the Town in excess of ten-years of age.

#### **Municipal Housing Project Facility Agreements**

2. In accordance with section 110 of the Act, Council may pass by-laws permitting the Town to enter into Municipal Housing Project Facility Agreements with Housing Providers allowing for the provision of assistance despite section 106 of the Act and to allow for tax and development charge exemptions.

#### **Conditions for a Municipal Housing Project Facility.**



1. Notwithstanding anything else in this By-law, prior to entering into a Municipal Housing Project Facility Agreement, the following conditions must be met:
  - a. Council has enacted a By-law authorizing the entering into of the Municipal Housing Project Facility Agreement for the provision of the Municipal Housing Project Facility;

The Municipal Housing Project Facilities Agreement meets the requirements set out in section 6

### **Housing Unit Household Eligibility**

2. Eligible Households for Housing Units to be provided as part of a Municipal Housing Project Facility will be selected by the Housing Provider in collaboration with the Town and Simcoe County as Service Manager.
3. Where the Average Market Rent is under 100% AMR, available Affordable Housing Units subject to a Municipal Housing Project Facilities Agreement shall be made available first to eligible Households on the Waiting List through Simcoe County or another wait list determined by the Town. If there are no eligible Households on the Waiting List, a Housing Unit may be made available to an eligible Household that is not on the Waiting List

### **Municipal Housing Project Facility Agreement Requirements**

4. Municipal Housing Project Facility Agreements for Affordable Housing shall include but shall not be limited to the following terms and conditions:
  - a. A definition of Affordable Housing as found in section 1;
  - b. That all of the Housing Units to be provided as part of the Municipal Housing Project Facility meet the applicable definition of Affordable Housing as set out in section 1;
  - c. A requirement that each unit in the Municipal Housing Project Facility shall fall within the definition of Affordable Housing in section 1;

- d. The term of the agreement, which shall not be less than twenty (20) years in the case of rental Affordable Housing Units;
- e. That public eligibility for the Housing Units to be provided as part of the Municipal Housing Project Facility shall be determined in accordance with section 4-5;
- f. A list of the benefits accruing to the Housing Provider under the Municipal Housing Project Facility Agreement, including the monetary value of such benefits;
- g. That the Housing Provider shall only provide Affordable Housing Units to individuals who are at Arm's Length to the Housing Provider, its shareholders, officers, directors and employees;
- h. For Affordable Housing Units offered for rent, the rents to be charged per unit, the method by which the rents may be increased during the term of the agreement and the limits on such increases;
- i. For Affordable Housing Units offered for sale, the sale price;
- j. That the Region may register the Municipal Housing Project Facilities Agreement on title;
- k. Any conditions attached to financial or other assistance given to the Housing Provider, including any such condition or requirements set forth as part of arrangements or obligations assumed by the Town with the federal or provincial government to provide Affordable Housing;
- l. The conditions respecting the sale, transfer, mortgage, encumbrance, or assignment, of any interest in the Municipal Housing Project Facility;
- m. That the Housing Provider shall be required to report annually and submit documentation therefor to the satisfaction of the Town's affordable Housing Coordinator, in the manner specified in the Municipal Housing Project Facilities Agreement;
- n. The consequences if the Housing Provider fails to comply with the terms and conditions of the Municipal Housing Project Facilities Agreement, which may include that the Housing Provider pay to the Town the financial assistance that has been provided to the Housing Provider; and
- o. Other terms and conditions satisfactory to the Town, which may include, but which are not limited to any and all forms of property transactions together with any and all general or specific security as the Town consider necessary and desirable.

# Appendix D – Sample AHMP Monitoring Template

Reporting Status 1: Housing Market Indicators	
# of Housing Starts	
# of Housing Starts Forecasted	
(+/-) Target	
(+/-) Change in Rental Housing Stock	
(+/-) % Change in Rental Vacancy Rate	
(+/-) % Change in Average Market Rent	
(+/-) % Change in Affordable Housing Wait List	
(+/-) % Change in Average Resale Price	

Reporting Status 2: AHMP Strategies				
AHMP Strategy	Status	Responsibility	Update	Recommended Actions



Trusted advisors since 1976.