

David Harrison, MCIP

**Submission Made to the Nova Scotia Affordable Housing Commission's
Request for Public Input**

February 18, 2021

RECOMMENDATION #1

That the Province appoint a Housing Ombudsman to improve coordination between 3 levels of government and deal with matters of red tape.

RECOMMENDATION #2

That Regional Enterprise Networks be mandated to help the private and non-profit sectors prepare market studies, keep local housing data current and act as navigators on complex housing program applications.

RECOMMENDATION #3

That Halifax Regional Municipality (a) review the impact of its urban design rules on the cost of housing, and (b) address the impact of its water utility connection fees by (i) amending the Centre Plan so that the Density Reserve Fund can be used to offset water connection fees for non-profit housing projects irrespective of their location, or (ii) provide grants to offset the cost and impact of its water utility fees on non-profit housing projects.

1. Better Coordination Between 3 levels of Government

Funding applications are complex and there is a lack of coordination between 3 levels of government. Non-profit housing groups are frustrated with the lack of clarity on funding decisions and the length of time that housing decisions take. Municipalities frequently raise questions about housing jurisdiction; however, municipalities have always had a role since they regulate the location and supply of housing through land use planning. Their role needs to evolve into one that helps address housing needs. Municipal governments should be encouraged to enhance their role as Co-Investment partners. Indeed, some are stepping up: see the attached "Comparison of Municipal Contributions to Affordable Housing."

2. Learn from Others (Housing = Economic Development)

Because affordable housing (a) helps support, attract and sustain labour, businesses and local economies (b) represents inbound investment, and (c) addresses many socio-economic issues; some municipalities are discovering a simple formula... Housing = Economic Development. In New Brunswick, some local economic development departments are in charge of housing

because of this strong link with economic development. In Nova Scotia, Regional Enterprise Networks should be mobilized to help the private and non-profit sectors prepare market studies, keep local housing data current and act as navigators on funding applications.

3. Provincial Guarantees for Non-Profit Seniors Housing

Covid-19 has shone a light on Nova Scotia's long term care system, prompting questions about the gap between independent living and long-term care, and whether new housing approaches might help older adults "age well in place" – and as long as possible - outside the long-term care system.

Some of Nova Scotia's 42 non-profit (community governed) care groups have land that could be used to (a) provide independent or assisted living options (b) stop the dislocation of older adults (c) reduce demands on our long-term care system, and (d) contribute to local economies. However, land alone is insufficient to secure financing. Provincial guarantees should be used to help secure financing and support the development of seniors housing on land owned by non-profit seniors' care groups. Given the strong market for seniors housing, the benefits of doing so will likely outweigh any risks of using loan guarantees this way.

What is seniors housing? An exemption clause in the NS Human Rights Act provides a clue. It allows organizations to legally restrict tenancy on the basis of age. The ability to restrict tenancy on the basis of age will be considered by the Human Rights Commission if the housing project includes (a) age friendly or universal design of the units (b) amenity spaces (indoor, outdoor) and (c) access to care services.

4. Halifax Water Connection Fees, Impact on Non-Profit Housing

Given the limited financial contributions being made by HRM¹, the Municipality's role as a partner in attracting financing (such as the Co-Investment Fund) is nominal at best.

Halifax Regional Municipality has the tools at its disposal to offset the impact of its water utility's connection fees on non-profit housing. HRM should provide grants to the non-profit housing sector to offset the cost of water connection fees on new, non-profit housing. Alternatively, the Centre Plan should be amended so that the Density Reserve Fund can be used to offset water connection fees for non-profit housing projects, irrespective of their location.

The extent of Halifax Water's impact on four non-profit housing projects located on the Dartmouth side of Halifax Harbour (but outside the Centre Plan boundary) is shown below:

¹ See the attached *Comparison of Municipal Contributions to Affordable Housing*.

<i>Non-Profit Housing Project</i>	<i># of Affordable Housing Units</i>	<i>Hfx Water Fees</i>	<i>Comments</i>
Affirmative Ventures <i>(District 6)</i>	45	\$225K	Water fees exceed HRM's contribution to the project 3-fold
Akoma Holdings, Building D <i>(District 4)</i>	12	\$54K	Water fees exceed the value of the land being donated by Akoma
Akoma Holdings, Seniors Housing <i>(District 4)</i>	80	\$397K	Water fees will likely far exceed HRM's contribution to this project
McNabs View Assisted Living <i>(District 3)</i>	60	\$292K	This project was moth-balled in 2015 due to financing barriers.
<i>Total</i>	<i>197</i>	<i>\$968K</i>	

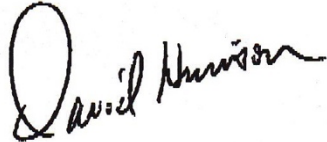
5. HRM Planning and the Role of Community Councils

Over the past 6 years, I have been involved with lengthy plan amendment processes so that (a) housing options for older adults in Fall River can be provided, and (b) currently with Akoma Holdings Inc. so that mixed income / affordable housing for our African Nova Scotian community can be enabled. These particular plan amendments have taken about 3 years to complete. In Moncton, a plan amendment takes 6 months on average.

Halifax Regional Municipality has not considered the impact of its urban design rules on the cost of housing. Urban design rules and Halifax Water fees recently prompted one Halifax developer to postpone construction of 65 affordable housing units in a mixed income housing project on Robie Street.

The concept of a housing 'continuum' is giving way to a focus on local housing 'ecosystems.' In HRM, knowledge of local housing ecosystems is best addressed at the Community Council level, whose population bases are as large or larger than other municipal governments in Atlantic Canada. They are the governance bodies dealing with the majority of planning decisions. The three long-standing community councils should be engaged in developing and implementing non-profit housing strategy and advance their mandates under Section 25 of the HRM Charter.

Thank you for considering my recommendations.



David Harrison, MCIP

Comparison of Direct Municipal Contributions to Affordable Housing
(February 13, 2021)

This table shows estimated contributions per capita being made in 2021 by selected municipal governments in Atlantic Canada for the express purpose of supporting the development of affordable housing in their communities.

The estimates are based on best available information as of February 2021 including the contribution amounts, number of fiscal years the funding is being made available and most recent population statistics.

The value of donated land has not been included, but where known, donated land has been noted. Most municipal governments listed below will waive building permit fees or provide offset grants for new affordable housing – these amounts have not been included. The value of any property taxes being waived for new affordable housing has not been included. Matching or flow-through funding from other levels of government have not been included.

On a per capita basis, the Town of Yarmouth leads seven municipal governments examined for their direct financial contributions being made to affordable housing.

The cities of St. John’s and Dieppe are making some unique contributions to affordable housing and these are described separately.

<i>Municipal Government</i>	<i>Estimated Per Capita Financial Contribution</i>	<i>Notes</i>
Town of Yarmouth	\$47.81 per year for two years*	<i>* The timing of the Town’s contribution of \$650,000 is not known. The estimate is for 2 fiscal years. If the Town’s contribution will be made in 1 fiscal year then the per capita contribution is \$95.62. If the Town’s contribution will be made over 3 years, then the per capita amount would be \$31.88 per year.</i> The Town’s contribution is for the construction of 27 affordable units as part of a 54-unit mixed income housing project.
City of Moncton	\$25.77 per year for three years	Moncton will make a contribution of \$6M to help support the development of 125 units of affordable housing.
City of Miramichi	\$20.81	In addition to a budget allocation to support recommendations contained in its housing needs study, Miramichi will facilitate a mixed income housing project on land that it owns, and will

		make a \$10K per unit grant available to support the construction of new affordable housing.
Municipality of the District of Chester	\$9.71	The District of Chester has agreed to provide funding to help a non-profit housing group develop affordable housing.
Town of Antigonish	\$4.58 per year for 5 years	\$100K will be provided over a 5-year period to the Antigonish Affordable Housing Society to develop 12-units of affordable housing on land donated by Antigonish County. The Town has previously donated land for an AAHS project.
Municipality of the County of Antigonish	\$1.37 per year for 5 years	\$100K over 5 years in cooperation with the Town of Antigonish - both governments are helping to cost share a 12-unit affordable housing project on land being donated by the County of Antigonish.
Halifax Regional Municipality	\$0.34	Based on an estimate of \$150K from community and district grants for affordable housing in 2020-21. A reserve fund is being set up for the regional centre which houses more than 25% of HRM's population and this fund could be used to support affordable housing. Land has been recently donated for an affordable housing project in Dartmouth.

Others

The City of St. John's makes a significant contribution to affordable housing every year. Similarly, the City of Dieppe has made a substantial commitment by land banking property in its downtown to support mixed income housing developments.

City of St. John's	St. John's has its own housing division and a staff of 6 that (a) manages 479 units of city-owned affordable housing (b) implements the city's affordable housing strategy, and (c) facilitates local housing partnerships.
City of Dieppe	Dieppe purchased 13 acres of downtown property and has adopted a mixed income housing strategy as the foundation of its Downtown Development Plan. Dieppe makes an \$11K per underground parking space incentive available for mixed income housing projects.

David Harrison has worked on 45 different housing initiatives in Atlantic Canada over the past 20 years. In 2016 he was invited by CMHC to participate in the Seniors Housing Roundtable in developing the National Housing Strategy and he was also an advisor with SHIFT: Nova Scotia's Action Plan for an Aging Population.