

April 1, 2025

TRANSIT--ORIENTED

New Developments in Metro Vancouver
Final Report



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An aerial photograph of Vancouver, British Columbia, showing the city skyline, the Fraser River, and surrounding green spaces. A semi-transparent blue rectangle is overlaid on the right side of the image, containing text. A solid yellow circle is positioned in the upper left corner of the blue rectangle.

Land Acknowledgement

We acknowledge that the Metro Vancouver Regional District (Metro Vancouver) is situated on the shared territories of many Indigenous Peoples, including 10 local First Nations: ǵícǵǵ (Katzie), ǵʷǵ:ńǵ' ǵń (Kwantlen), kʷikʷǵǵ' ǵm (Kwikwetlem), máthxwi (Matsqui), xʷmǵθkʷǵ' ǵm (Musqueam), qiqǵyt (Qayqayt), se'mya'me (Semiahmoo), Skwx_wú7mesh Úxwumixw (Squamish), scǵǵǵǵǵ mǵsteyǵxʷ (Tsawwassen), and sǵlilwǵǵǵǵ (Tsleil-Waututh).

Bill'd More Housing is committed to creating equitable urban environments that centre Indigenous stewardship, sovereignty, and self-determination, particularly in the context Metro Vancouver where approximately 20% of Indigenous households are in Core Housing Need [1]. Reconciliation must include interrogating and dismantling the colonial and racist land use practices which played, and continue to play, a role in the dislocation of Indigenous people, the dispossession of their land, and systemic housing inequalities that disproportionately impact them.

Acknowledgment

The Bill'd More Housing Studio Team extends heartfelt gratitude to everyone who contributed to the development of this project. We deeply appreciate the invaluable input of our Studio Partner, MODUS, whose expertise helped shape our work. We are also grateful to our SCARP Studio Instructors for their insightful guidance and constructive feedback throughout this process. Lastly, we sincerely thank all the interviewees for generously sharing their perspectives and knowledge.

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All interviewees

**“together [the
Provincial Housing
Mandates] represent
the most significant
change to land use
planning in B.C. in
many years, perhaps
even decades.”**

—Don Luymes

*quoted in Surrey Now-Leader,
December 7, 2024*

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Executive Summary

In 2023, the Province of British Columbia introduced a set of “housing mandates”—Bills 16, 44, 46 & 47—to **address the housing crisis by increasing supply and enhancing affordability**. Given the novelty of these mandates, this report aims to:

1. **Assess the challenges and opportunities presented by the mandates (Phase 1)**
2. **Examine the realities of integrating the mandates into local planning (Phase 2)**
3. **Provide recommendations for the Province and local governments**

Phase 1

We identified the most significant uncertainties, challenges, and opportunities faced by local governments, developers, and stakeholders related to Provincial housing mandates. Through a media scan, policy review, and interviews, we examined how these mandates impact local planning.

Opportunities

- Facilitated housing development
- Improved needs assessment
- Compact urban growth
- Energy & emissions efficiency

Challenges

- Capacity to address housing need
- Missing local contexts
- Protections for low-income & vulnerable populations
- Ability to accommodate growth
- Capacity of municipal staff

Phase 2

We developed a deeper understanding of the implications and complexities of provincially mandated SkyTrain Transit-Oriented Areas (TOAs) by conducting a comparative analysis of three TOAs - Edmonds Station in Burnaby, Moody Centre Station in Port Moody and Hillcrest-184 Street Station in Surrey.

Key Findings

- Most impacts of the housing mandates have yet to be fully realized
- The developmental outcomes of the housing mandates depend on a variety of factors
- Transit-Oriented Development precedes mandates
- Broader municipal needs assessments are needed
- Uncertainty about the Concentric TOA Approach
- Efficacy of the ACC tool is uncertain

Recommendations for the Province, Municipalities, and Future Research

Based on our findings, we recommend that the Province refine its policies, clarify financial mechanisms, and introduce more flexibility in TOA designations to better support local needs. To support the projected growth and development, municipalities should prioritize infrastructure investment, strengthen TOA rental markets, and integrate more mixed-use zoning within TOAs. Future research should focus on policy conflicts and creating a regional housing forum for collaboration and knowledge-sharing.

Background

Housing in Metro Vancouver

Housing in Metro Vancouver has become increasingly inaccessible for renters and homeowners alike. As housing costs continue to rise and vacancy rates remain far below acceptable thresholds, more people are finding themselves either unable to find homes in the area or are in increasingly insecure situations.

A recent Royal Bank of Canada report found that it has never been as expensive to buy a home in Canadian history as it was in Vancouver in the last quarter of 2023 [1]. The dramatically high housing costs in municipalities across the region have resulted in increases in homelessness and housing insecurity, forcing more and more households into inadequate and/or unsuitable housing. The Housing Assessment Resource Tool (HART) has calculated a deficit of over 166,000 affordable homes in Metro Vancouver as of the 2021 census [2]. In 2023, the Urban Reform Institute ranked Vancouver as having the third least affordable housing globally [3].

The causes of this affordability crisis are numerous and complex, but one major contributing factor is a general lack of housing supply, as Metro Vancouver has also maintained the lowest vacancy rate of any metropolitan area in the country [4]. In cases where development can help to alleviate supply issues, the consequences of these developments are often felt unequally among different demographic and income groups.

Housing Mandates

In response to the housing crisis, **the Province of British Columbia introduced a suite of legislation to increase housing supply and enhance affordability by:**

- Promoting higher densities
- Introducing new development financing tools for municipalities
- Streamlining and standardizing development processes across Metro Vancouver
- Delivering Transit-Oriented Development (TOD)



Overview of the Housing Mandates

The Provincial housing mandates—including [Bills 16, 44, 46, and 47](#) (herein referred to as the ‘housing mandates’)—were integrated into the [Local Government Act](#) and the [Vancouver Charter](#) in late 2024. The quick implementation of Bill 47 and the other housing mandates, and their blanket approach presents a range of challenges, uncertainties, and opportunities for communities across British Columbia. For municipalities, the mandates necessitate a rapid overhaul of bylaws, eventual updates to Official Community Plans (OCPs), and adaptation to new requirements.

Finance & Other Tools

Bill 16



Local Government
Tools

Bill 46



Development
Finance Tools

Location-based

Bill 44



SSMUH &
Proactive Planning

Bill 47



Transit-Oriented
Development

Key Provisions

Bill 16: Creates capacity to implement an inclusionary zoning (zoning that requires the provision of affordable housing) bylaw and tenant protection bylaw, updates density bonusing tool and expands site-level infrastructure and transportation demand management (TDM) authorities.

Bill 46: Streamlines and expands applicable uses of Development Cost Charges (DCCs) and Development Cost Levies (DCLs), and creates new Amenity Cost Charges (ACCs).

Bill 44: Requires municipalities to permit small-scale, multi-unit housing (SSMUH) development on single-family and other low-density zoned lots, ensures municipalities maintain long-term OCPs, Housing Needs Reports (HNR) and zoning policies, and prohibits public hearings for rezoning on projects that are consistent with OCPs.

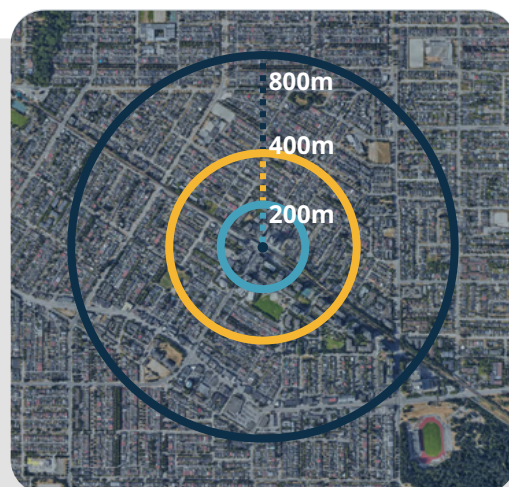
Bill 47: Mandates the designation Transit-Oriented Areas (TOAs) in three-tiered radii around SkyTrain stations and bus exchanges, creates minimum allowable density and height thresholds in TOAs under which local governments may not oppose applications based on density or height, and eliminates parking minimums in TOAs.

Transit-Oriented Areas

Bill 47 orders municipalities to designate TOAs around all SkyTrain stations and bus exchanges.

Tiered building height and Floor Area Ratio (FAR) thresholds are mandated within different distance intervals. For SkyTrain stations, the minimum allowable density is as follows:

- **800 m — 3.0 FAR, 8 Storeys**
- **400 m — 4.0 FAR, 12 Storeys**
- **200 m — 5.0 FAR, 20 Storeys**



Project Approach

Objectives

Phase 1

Identify the most significant challenges, uncertainties and opportunities faced by local governments, developers, and stakeholders related to the housing mandates

- Shed light on and summarize the implications of the mandates
- Synthesize key learnings from industry stakeholders
- Explore the capacity of municipalities and developers to deliver housing encouraged by the mandates

Phase 2

Develop a deeper understanding of the implications and complexities of provincially mandated TOA's by conducting a comparative analysis of three TOAs

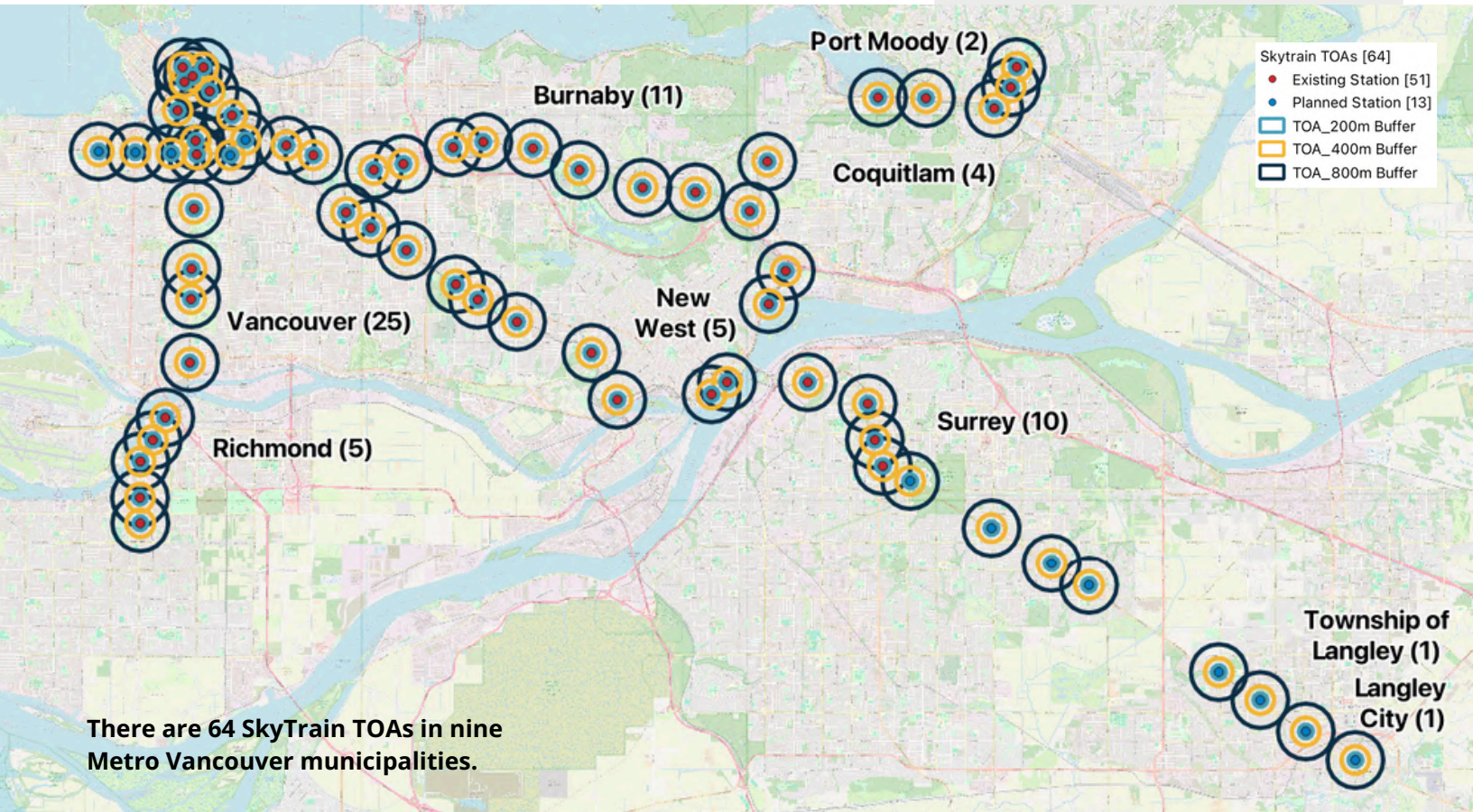
- Share the realities of integrating the mandates in municipal work
- Summarize findings and provide recommendations
- Outline areas for future discussion/steps

Area & Scope

We examined the implications of the housing mandates, with a focus on Bill 47.

In Phase 1, the geographic focus included nine municipalities with existing or planned SkyTrain stations in Metro Vancouver. There are 64 SkyTrain TOAs in these municipalities.

In Phase 2, this focus was narrowed to three TOAs in the municipalities of Burnaby, Port Moody and Surrey (herein referred to as the “studied municipalities”).



Key Concepts

To kickstart Phase 1 of this project, we conducted a literature review on key concepts related to the housing mandates. The results of the review were used to develop a conceptual framework that defines and elaborates on essential terms for our analysis of the housing mandates. In addition, the framework is critical to assess the significance and value of the widely varying topics being examined.

Transit-Oriented Development

Transit-oriented development (TOD) is a land use planning and urban design concept that stimulates development around transit hubs. TOD aims to capture the benefits of public transportation networks by focusing new housing and other forms of development within walking distance of transit hubs. This theory typically integrates mixed-use development, prescribes densification, facilitates multi-modal transport systems, increases accessibility, and promotes pedestrian-friendly environments. This focused development supports the growth and efficiency of public transportation networks, helping justify the often significant public investments in these systems [5]. In the housing mandates, the principle of TOD is manifested in Bill 47 by establishing TOAs. By concentrating housing within walking distance of transit hubs, TOD can create more efficient and sustainable urban environments that have the ability to alleviate inequities through improved access and safety [6].

Core Housing Need

One of our objectives as planners interested in improving housing outcomes is addressing Core Housing Need (CHN), defined as a measure of whether a household meets an acceptable standard based on affordability, suitability (whether the size of the home is appropriate for the household makeup), and adequacy (whether the home is in need of major repairs). We relied on HART's calculation of CHN in Metro Vancouver, which contains several key findings [7]:

- There is housing need across most income levels, including those that can reasonably afford market-rate housing.
- The majority of people in CHN cannot afford market-rate housing, meaning either market rates will need to decline, or municipalities will need to supply below-market housing to fully address CHN.
- Certain population groups are more likely to be in CHN, including historically marginalized peoples such as visible minorities and Indigenous People, as well as people with particular needs such as single mothers and people with physical disabilities. To fully address CHN, attention must be made to the specific disadvantages and barriers faced by these groups.





Housing Supply & Affordability

One of the primary objectives of the housing mandates is to alleviate shortages in the housing supply by facilitating market development.

A major component of the housing crisis in Metro Vancouver is low vacancies. The CMHC's 2024 Rental Market Report records the area vacancy rate is 0.9%—well below the national average of 1.5% and the CMHC's predetermined “healthy” rate of 3.0% [4]. As documented by a data expert Jens von Bergmann, empirical evidence shows an inverse correlation between vacancies and rent change, demonstrating that a housing shortage contributes to unaffordability across the region [8]. In a more recent article, von Bergmann calculates that if all municipalities in Metro Vancouver were to meet the new housing targets set out by the Province in 2023 with market-rate housing, inflation-adjusted rents in the region would decrease by 30%, effectively lifting 35% of households out of CHN. In addition, this would reduce the annual subsidy needed to make all housing affordable from \$1.48B to \$0.68B [9].

While these effects are substantial, there would still remain a large unmet housing need. HART calculates that the two income groups most likely to be in CHN have maximum affordable monthly housing costs of \$450 and \$1,125 [7] respectively, and would therefore still be in an unaffordable situation if average rents in the region decreased from \$2,181 for a two-bedroom apartment to \$1,527 (in line with von Bergmann's calculations). Furthermore, the lowest-income households, who are naturally also the most insecure, are typically the last to benefit from increased market housing. What this means is that addressing CHN necessitates solutions outside of market-rate housing.

This analysis concludes that increasing the housing supply is crucial to increase affordability, though ultimately insufficient to fully address housing need. Von Bergmann advocates viewing market and non-market housing as parts of the same system, working in conjunction to relieve different segments of the housing crisis. The ability of the housing mandates to alleviate affordability issues rests in their ability to contribute to all parts of this system.

Livability & Complete Communities

The concept of livability generally refers to a city's ability to meet the well-being and quality of life expectations of its residents [10]. While Metro Vancouver has long prioritized livability in regional plans, the region still faces major challenges, especially around housing affordability. By increasing housing supply through densification around transit hubs, Bill 47 creates more favourable conditions for developing complete communities, which offer a range of housing, employment opportunities, services, amenities, and green spaces within a convenient walking distance, ensuring residents can meet their daily needs close to home [11]. To help municipalities balance the demands of increased density with maintaining livability, Bills 16 and 46 update regulatory and financial tools to assist in securing affordable housing and essential services. We seek to explore how municipalities can effectively leverage these tools to deliver affordable housing, services, and amenities while supporting broader livability goals.

Methodology



Desktop Research



Media Scan

As a continuous research method, we have conducted multiple media scans to analyze how the nine municipalities with existing or planned SkyTrain stations have been reacting and adjusting to the housing mandates as well as to track proposed and ongoing developments. This approach involved systematically reviewing local news outlets, government press releases, and other relevant publications to capture insights into municipal strategies, public reactions, and policy adjustments. An overview of findings can be found on p. 20 of the report, with more details on the studied municipalities in **Appendix 1**.

Policy and Literature Review

We reviewed various council reports to understand the key concerns of staff and to track the adoption process of mandate-related bylaws in the nine municipalities with existing or planned SkyTrain stations. This review included gathering council meeting agendas, minutes, and supplementary reports from municipal websites. This exercise provided valuable context into the challenges and opportunities municipalities face in aligning their strategies with the mandates. The literature review in Phase 1 also enabled us to establish our key concepts.



Site Visits

To gain a deeper understanding of the chosen TOAs in Phase 2, we conducted a site visit and analysis of each of the three sample TOAs. The group explored the concentric TOAs to assess the physical attributes that create uncertainties and complex challenges to implementing the mandates. Specific focus was given to the built environment, housing typologies, land uses and geographical and environmental barriers. These findings complimented desktop research and interview findings.

Limitations

Media bias: Sensationalism can lead to an emphasis on overly negative or positive viewpoints, while coverage may lack comprehensiveness and fail to reflect the diversity of opinions across communities.

Recency of the housing mandates: Council reports may only reflect initial reactions and adjustments rather than fully developed strategies, limiting the insights into long-term planning.

Quantitative Analysis & Mapping

Census Data Analysis

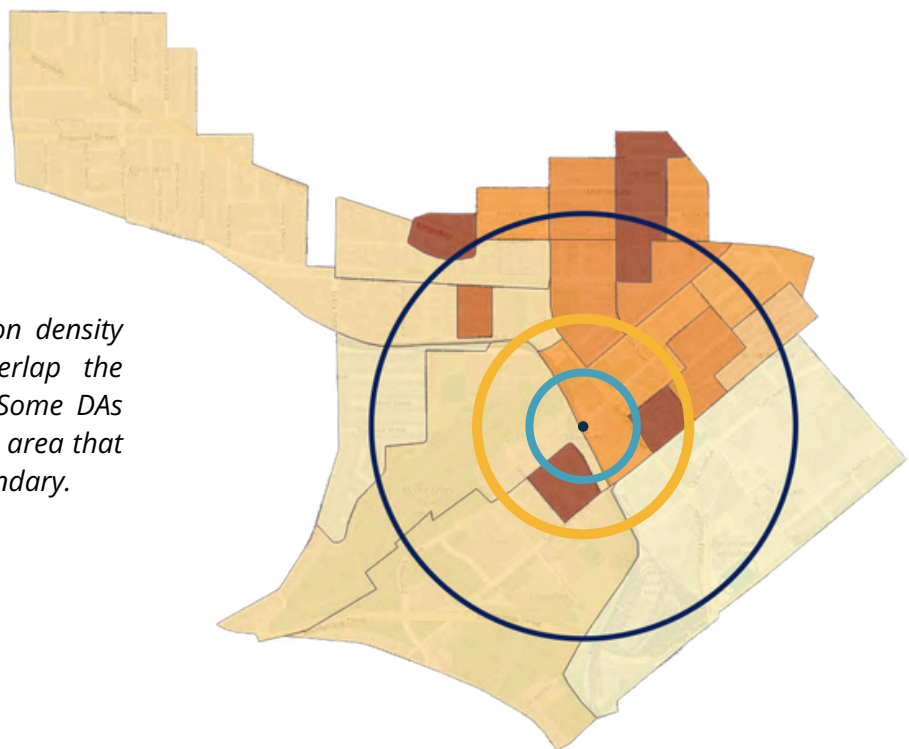
Statistics from the 2021 Canadian census are relied on throughout the report, including to analyze characteristics of the Metro Vancouver Regional District, and to create profiles of the communities within the TOAs. The data was collected directly from Statistics Canada, and was manipulated where needed to calculate averages, proportions, and medians. A full list of the census variables and tables used can be found in **Appendix 2**.

Limitations

Recency of data: There is an approximate 5-year difference between the data gathered by the 2021 census and the actual, up-to-date data. Considering the housing situation is dynamic, and some variables such as median rents have seen rapid fluctuations over the past few years, the census data represents a best estimation of the variables examined, and may differ from the up-to-date reality.

Census boundaries: Census Dissemination Areas (DAs) were used as the geographic area of analysis. Although DAs are the smallest geographic areas for which data is publicly available, the boundaries do not correspond with the circular boundaries of the TOA tiers. We opted to estimate statistics within the TOA, by analyzing only the DAs which overlap with the outer boundary. While this method provides a fairly accurate vision of the community, the results do not perfectly represent residents living inside the TOA.

A map of the population density of the DAs which overlap the Edmonds Station TOA. Some DAs contain portions of land area that fall outside the TOA boundary.

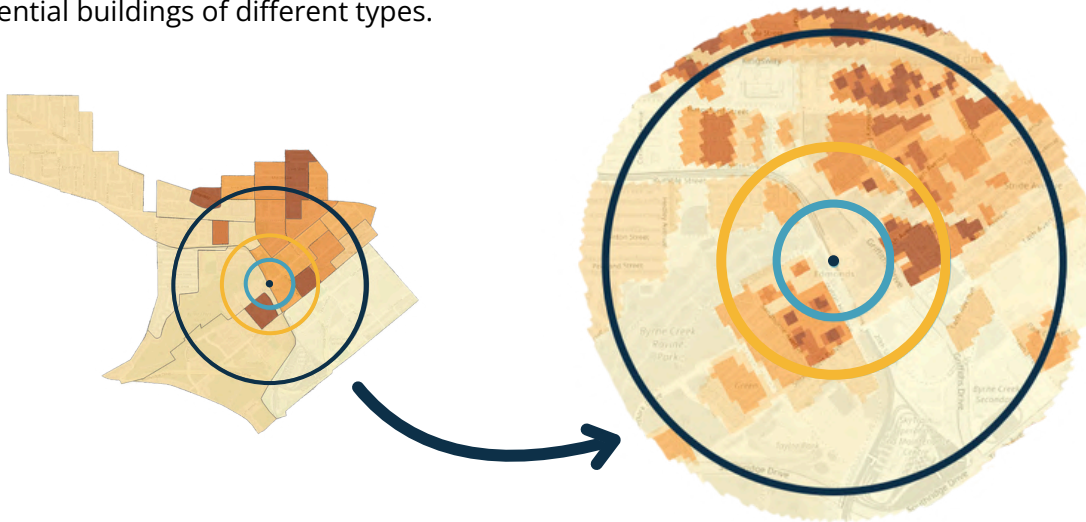


Dasymetric Weighting

For a more accurate estimation of population density within the TOAs, census data was dasymetrically weighted to relate population density to land cover.

Maps of census DAs were divided into “cells” 20x20 metres in size. A weight was systematically applied to each cell according to its land cover makeup, which was observed using satellite imagery. Weights were calculated based on the relative density of assigned land cover “codes,” created by synthesizing best practices from Portland State University [12], the University of British Columbia’s Design Centre for Sustainability [13], and Neptis Foundation [14]. A full breakdown of methods and assumptions can be found in [Appendix 2](#).

The result of this process is a more accurate representation of the spatial arrangement of the population, as density is not merely averaged according to the boundaries of each DA, but estimated according to the actual location of residential buildings of different types.



Limitations

Though this provides a better estimation of population density than the raw census data, it is still an estimate which cannot perfectly represent residents living inside the TOA boundary. This is because it still uses the census data as a basis, and thus is still skewed by the land area of the DAs that rest outside of the TOA.

Estimates of Potential for New Housing

A combination of census data, municipal open data concerning zoning, buildings, and parcels, and real estate listing data was used to estimate the current number of residential units within three sample TOAs, and to estimate the approximate number of units if parcels within residential zones were to be redeveloped up to the height and FAR thresholds defined for each TOA tier.

The total land area for parcels that are currently zoned to allow residential uses was first calculated. This was used to calculate the gross residential floor area of buildings constructed to the FAR thresholds, which was then converted into an approximate number of units based on the average unit size for each respective city. A full explanation of the sources, methods, and assumptions can be found in [Appendix 2](#).

Simplified Zoning Maps

To aid in estimating the potential for new housing, the zoning codes of Surrey, Port Moody, and Burnaby were simplified in order to summarize which zones allow for residential uses, separated by whether they are residential only, or mixed-use. The rationale for this simplification is that the density thresholds outlined in Bill 47 apply to parcels which are currently zoned to allow residential uses.

Interest Holder Interviews

Phase 1

Thematic Interviews

We adopted a thematic approach to the interview methodology, focusing on key planning themes to ensure various impacts were researched. **The goal of was to capture the breadth of the mandate's impact on planning.** For each thematic area, we aimed to include a balance mix of interviewees from both the public and private sectors. Interviewees were asked a set of general questions about the implementation and predicted impacts of the legislation, followed by specific questions about the intersections of the mandates and their respective planning fields. Interviews were recorded and transcribed, allowing us to assign "codes" to specific quotes that represent themes, concepts, or patterns. Once the data was coded, we analyzed the frequency and context in which these themes appeared, helping uncover common challenges, opportunities, or data gaps.

Phase 2

Qualitative Interviews

We used a qualitative approach to this interview phase. **The goal was to understand the depth of planning impacts in specific municipalities and TOAs.** Interviews were conducted with public sector planners working in the three sample TOAs. Public sector interviewees were asked a set of general questions about the implementation of the mandates in the municipality and the degree of disruption they have caused to planning processes, followed by specific questions about the impacts on the TOA study areas. Other qualitative interviews were conducted with subject matter experts to elucidate further questions from Phase 1, including queries about the impact on land values and HNR methodology.

Limitations

Limited sample size: The quantity of interviews restricts the diversity of perspectives and may not capture the full range of views and experiences.

Interview bias: The phrasing and focus of questions can lead interviewees to overemphasize certain themes, potentially narrowing the scope of insights and under-representing complexity.

Educated assumptions: Due to the recency of the housing mandates, interviewees may rely on assumptions rather than actual experiences when discussing the benefits or challenges of the mandates, potentially limiting the accuracy of the insights.

Who We Talked to

Development Economics

- 1 municipal development planner

Environment & Amenities

- 2 environmental planners
- 1 municipal parks planner
- 1 municipal community planner

Housing

- 1 municipal housing planner
- 1 development professional

Legal & Operational

- 1 legal expert in planning law
- 1 municipal transportation planner
- 1 mobility consultant

Who We Talked to

Municipal Planners

- 2 planners at the City of Port Moody
- 1 planner at the City of Burnaby
- 1 planner at the City of Surrey

Experts

- 3 subject-matter experts covering land & housing economics, and HNR methodology.

Use of Phase 1 Findings

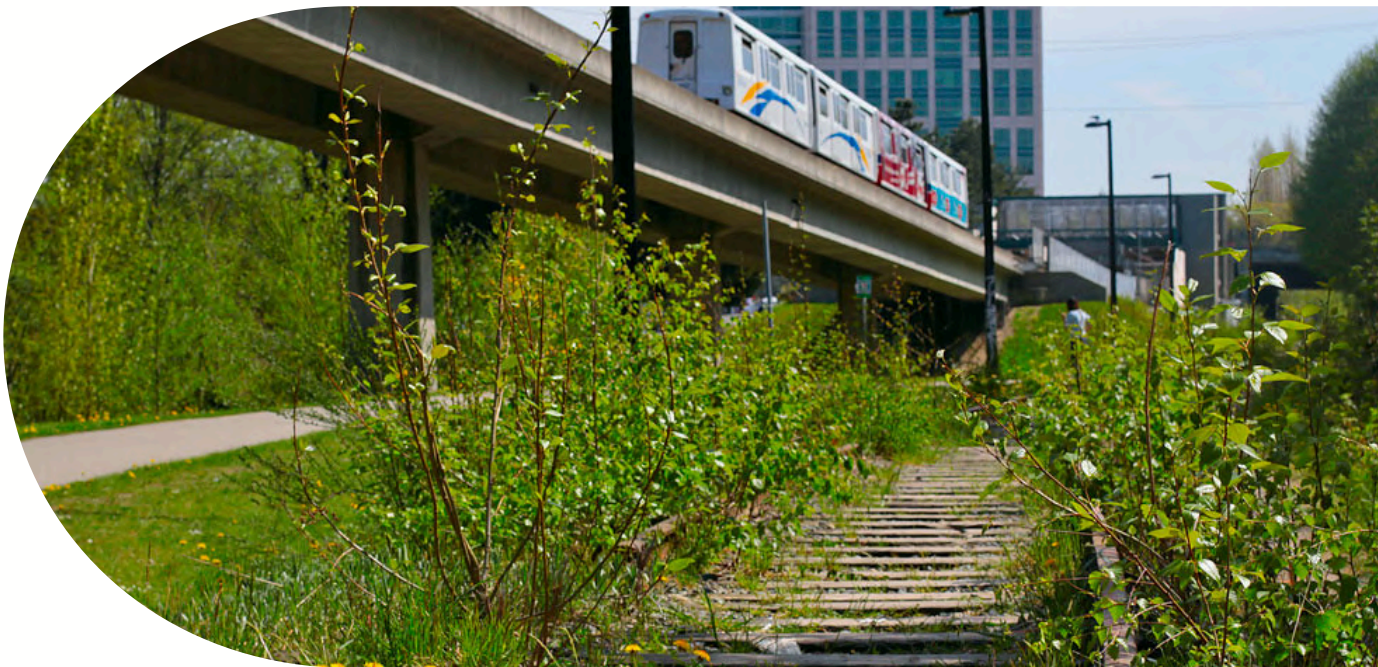
Phase 1 sought to understand the broad implications of the housing mandates, by exploring numerous uncertainties and assumptions to identify the biggest challenges and opportunities presented by the legislation. These findings culminated in an Interim Report. The full Interim Report is not available to the public, yet the majority of the findings and pages are contained within this report.

During this phase, we conducted a media scan, literature review, and policy review to gain a high-level understanding of the effects of the housing mandates on Metro Vancouver municipalities. Then, we conducted the thematic interviews to gain a more in-depth understanding of particular areas and topics of interest.

The findings of the Interim Report resulted in the **Emerging Themes, Key Opportunities, Key Challenges** and **What We Did Not Hear**. These sections represent the findings of desktop research and thematic interviews with stakeholders across Metro Vancouver. These sections are integrated throughout this report and lay the analytical foundation for how the case studies are analyzed. Phase 2 of this project aims to assess the findings of Phase 1 by investigating the key characteristics that challenge and assist the implementation of the housing mandates in each of the three sample TOAs.



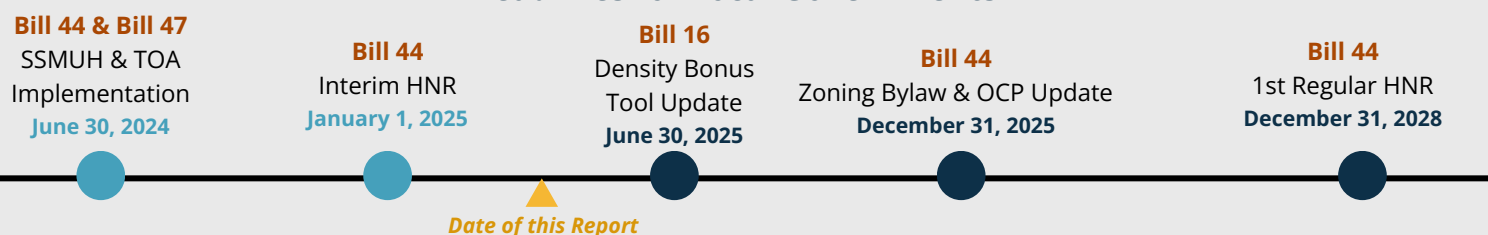
Phase 1 Findings



Municipal Response

Local governments are required to meet the deadlines set by the provincial government to comply with the new housing mandates. As of the date of this report, nearly all Metro Vancouver municipalities with existing or planned SkyTrain stations have adopted a TOA bylaw and met the interim HNR deadline. We have summarized the key progress made by these cities based on a review of council reports.

Deadlines for Local Governments



Bill 46: Local governments can update existing DCC/DCL bylaws to include new eligible infrastructure categories or introduce an ACC bylaw at **any time**.

Municipality	# of TOAs	Population (2021)	20-Year Housing Need (2021-2041)	TOA Bylaw Adoption Date	Interim HNR Release Date	ACC Bylaw Adoption Date
Burnaby	16	249,125	74,051	December 2, 2024	October 17, 2024	July 1, 2024
Coquitlam	8	148,625	N/A	July 8, 2024	N/A*	In-Progress
Langley	2	28,963	10,498	June 17, 2024	December 2, 2024	N/A*
New Westminster	5	78,916	27,523	June 24, 2024	December 9, 2024	In-Progress
Port Moody	2	33,535	9,796	June 25, 2024	November 12, 2024	In-Progress
Richmond	5	209,937	51,981	June 24, 2024	December 3, 2024	In-Progress
Surrey	15	568,322	169,221	June 10, 2024	December 12, 2024	In-Progress
Township of Langley	2	132,603	43,038	N/A*	November 18, 2024	In-Progress
Vancouver	29	662,248	182,947	June 26, 2024	November 12, 2024	In-Progress
Total	84	2,112,274				

* Information not available on city websites and council reports.

Media Scan Highlights



Through our media scan, we identified key reasons for support and challenges highlighted by mayors and councillors regarding the implementation of the housing mandates, particularly the designation of TOAs. See **Appendix 1** for a more precise scan on the municipalities of the studied TOAs.

Reasons for Support

Increased housing supply: Municipalities generally agree on the need to address housing shortages, particularly for affordable and diverse housing types.

Improved transit accessibility: Bill 47 encourages denser housing near transit hubs that can support sustainable urban growth, promote walkable communities and reduce car reliance.

Streamlined approvals: Eliminating public hearings for developments that align with OCPs reduces bureaucracy and shortens approval timelines by removing a step that often causes significant delays.

Common Concerns

Blanket approach: Municipalities argue the mandates fail to account for varying contexts, such as different population densities, geographical constraints and specific community needs.

Loss of local authority: Some municipalities feel sidelined, arguing that the legislation compromises their ability to exchange density for community amenities.

Disruption of local planning: Municipalities express that the mandates disrupt years of carefully crafted local planning efforts. They point to adverse effects on local affordable housing initiatives and potential delays in housing starts due to revised density requirements.

Infrastructure capacity: Critics emphasize on the potential strain on existing infrastructure (e.g. sewage, schools, parks, healthcare, transportation, fire responses) due to accelerated development.

Thematic Interview Highlights



This word cloud represents what we heard over the course of the **thematic interviews** conducted in Phase 1. The interviews were coded in order to quantify the importance of various topics according to how frequently they were mentioned, which is represented by the size of each bubble. A complete analysis of our thematic interview findings can be found in **Appendix 3**.

What We Heard

Themes

- High Impact within TOAs
- Cautious Optimism in the Public Sector
- Enthusiasm Among Developers
- High Volumes of Changes with Tight Deadlines
- Uncertainty about Long-Term Impacts

Opportunities

- **Facilitated Housing Development** through legislated changes to land use and development tools
- **Improved Needs Assessment** for municipal housing, infrastructure and services
- **Compact Urban Growth** to promote liveable, complete communities
- TOD can improve housing and community **Energy & Emissions Efficiency**

Challenges

- **Capacity to Address Housing Need** — affordability and right supply
- **Missing Local Contexts** in applying and implementing legislation
- **Protections for Low-Income & Vulnerable Populations** in housing policy and development
- **Ability to Accommodate Growth**
- **Capacity of Municipal Staff** to implement mandates, meet deadlines and growing needs

What We Didn't Hear (As much as expected)

- **Environmental Harms of Densification** and ecosystem impacts on the built environment
- **Topographical Concerns around TOAs** and the physical constraints
- The **Jurisdictional Overreach** of Provincial Government on local authority's land-use and housing decisions
- **Neighbourhood Character** of the built form amidst new development

Our research has identified and **shown diverse perspectives on the Provincial housing mandates from various actors.**

The findings have highlighted the complexities and uncertainties of implementing the housing mandates, particularly in TOAs. While the objectives of the bills aim to streamline and promote approvals and increase housing supply, they also raise concerns about infrastructure strain, environmental impacts, and equitable development.

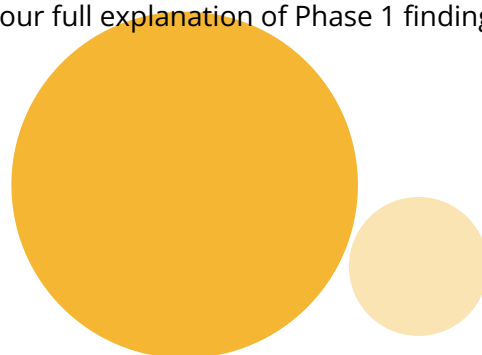
The research shows a contrast between the views and opinions expressed online, in the media, within municipal reports, and in our interviews.

The media scan showed a slightly more contentious view of the mandates, particularly regarding jurisdictional overreach, the blanket approach and the sidelining of community needs and voices. These challenges were less prevalent in the interviews. Challenges identified by professionals in both the public and private sectors include implementation challenges and capacity constraints.

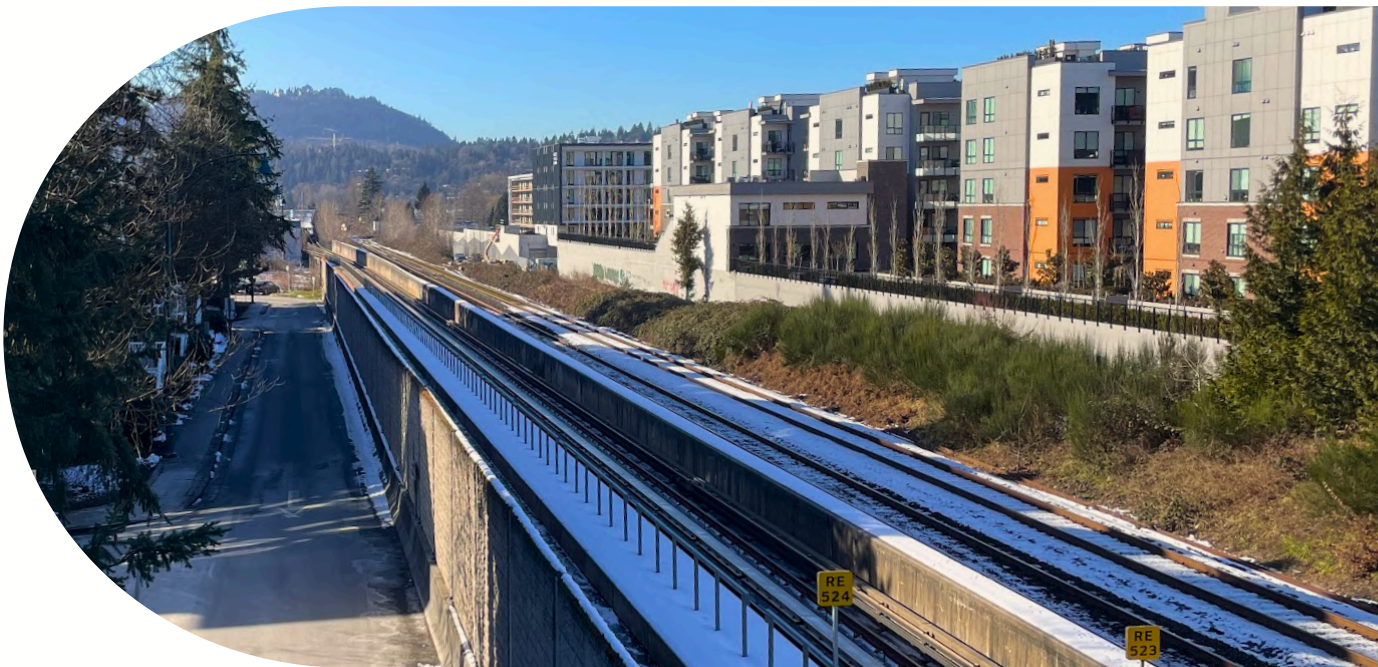
A key finding in the media, the loss of local planning and the negative effects of density on neighbourhood character were also not reflected in the interview stage. Interviewees were more optimistic overall that the housing mandates are valuable and can deliver housing supply and increased affordability than the media coverage suggested.

While media coverage often amplifies the perspectives of local politicians, our interviews focused on professionals directly engaged in housing development who must navigate the changing regulatory frameworks.

For our full explanation of Phase 1 findings, see **Appendix 3.**



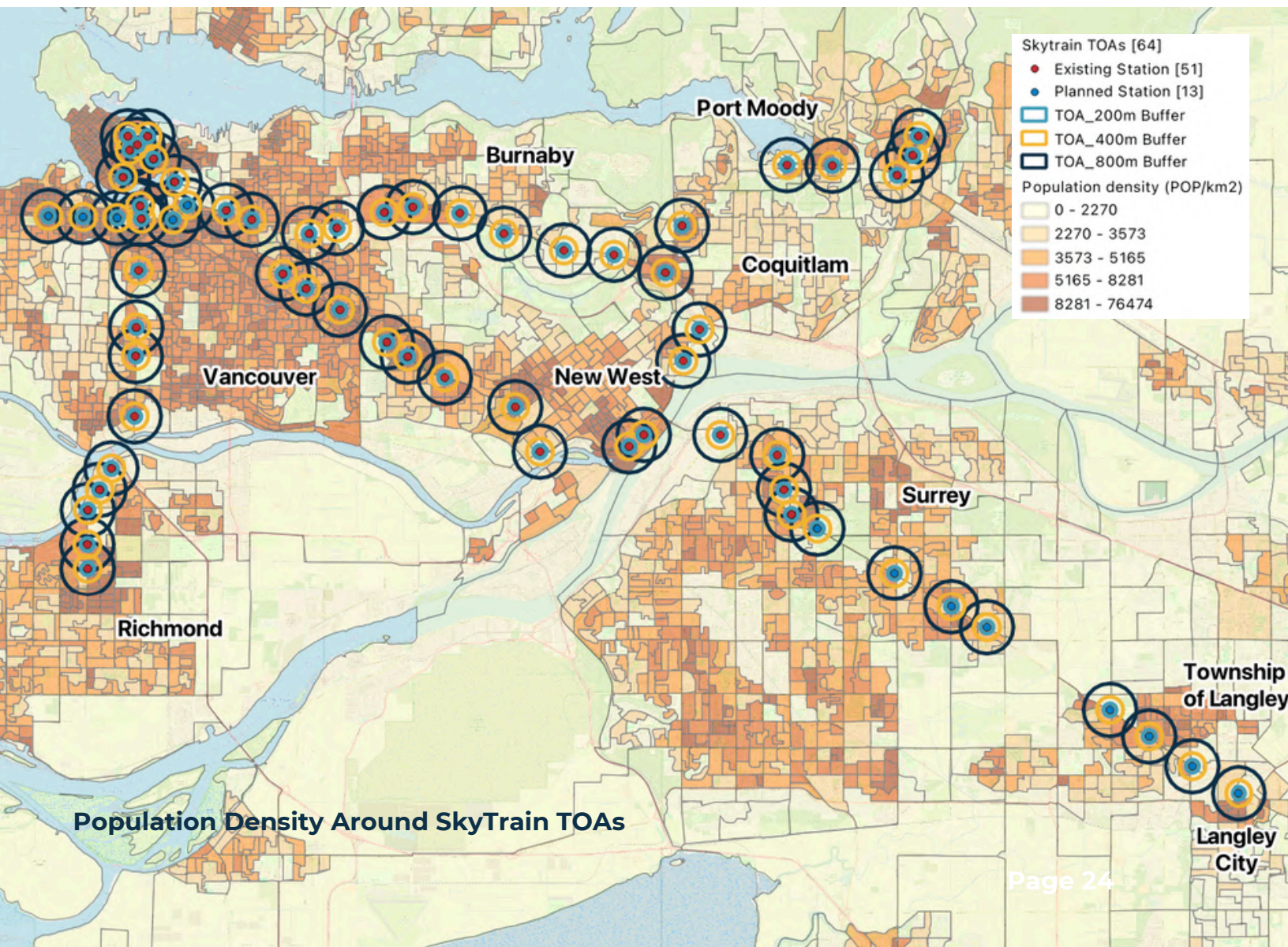
Phase 2 Findings



Exploring Metro Vancouver's SkyTrain TOAs

The goal of Phase 2 was to develop a deeper understanding of the implications and complexities of the provincially mandated TOAs by conducting a comparative analysis of three TOAs. We selected three TOAs to analyze our Phase 1 findings and explore how different municipal contexts shape the implementation of the TOA mandate. This analysis considers both the broad implications of the housing mandates and their localized effects.

Of the 84 designated TOAs, 64 are located around SkyTrain stations - 51 of which are already built, while 13 are still in the planning and development stages. These SkyTrain TOAs tend to have higher population densities compared to other areas in the region, making them significant focal points for TOD.



Exploring Metro Vancouver's SkyTrain TOAs

We analyzed the existing conditions and livability metrics of all the 64 SkyTrain TOAs in Metro Vancouver and summarized our findings in the table below. For a detailed explanation of how each metric relates to livability and the assessment of each TOA, please refer to [Appendix 4](#).

Municipality	Population (2021)	# of SkyTrain TOAs	# of SkyTrain TOAs with							
			Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
Burnaby	249,125	11	11	11	9	3	0	2	2	3
Coquitlam	148,625	4	4	4	4	1	0	0	0	1
Langley	28,963	1	0	1	1	0	0	0	0	0
New Westminster	78,916	5	5	1	5	0	3	2	1	0
Port Moody	33,535	2	2	2	2	1	1	0	0	2
Richmond	209,937	5	5	5	5	0	0	0	0	0
Surrey	568,322	10	4	7	5	4	3	6	8	4
Township of Langley	132,603	1	0	1	1	0	0	0	0	0
Vancouver	662,248	25	20	14	18	4	6	20	2	2

Key Terms

- **Stations In Use:** SkyTrain stations that are currently operational as of the date of this report.
- **Existing Area Plans:** Includes secondary plans, specifically local area plans and TOD plans.
- **Planned Growth Areas:** Areas identified by Metro Vancouver as *Urban Centres*, or *Frequent Transit Development Areas* or designated by municipalities for economic growth.
- **High Green Space Provisions:** TOAs with a high proportion of parks or green space compared to the 64 SkyTrain TOAs.
- **High Land Use Mixes:** TOAs with high Land Use Mixes in Metro Vancouver's [Walkability Index 2021 Report](#) [15].
- **High Walkability:** TOAs with high Walkability Indexes in Metro Vancouver's [Walkability Index 2021 Report](#) [15].
- **High Ethnic Diversity:** TOAs with Ethnic Diversity indexes ranging from 0.61 to 1.00 in Metro Vancouver's [Inequity Baseline Data Indicator Maps \(2021\)](#) [16].
- **Low Core Housing Needs:** TOAs with less than 20% of households in core housing needs.

TOA Selection

The three case studies are Edmonds Station in Burnaby, Moody Centre Station in Port Moody, and Hillcrest-184 Street Station in Surrey. These areas represent diverse urban scales, demographic contexts and growth patterns. By selecting these three TOAs, we aim to capture a range of challenges and opportunities, from immediate community impacts to long-term planning considerations.

Edmonds Station, Burnaby

Burnaby, with a mid-sized population, has taken a more progressive approach to facilitating growth with policies encouraging higher density and TOD. Edmonds is an established community with older but dense housing stock, a high proportion of renters, diverse demographics, and a concentration of culturally significant businesses. These factors drive development potential within the Edmonds TOA, making it an important case for understanding how the housing mandates affect existing communities, commercial districts and vulnerable populations.



Moody Centre Station, Port Moody

Port Moody is one of the smallest municipalities in Metro Vancouver in population and land area, and has seen little population growth in recent years. Given its slower development pace, we are interested in examining how the TOA designation interacts with existing and developing plans and whether it will drive significant change in the area. Moody Centre TOA's hilly terrain, diverse land use mix and significant overlap with the waterfront, raises questions about the applicability of the concentric circle approach to TOD.



Hillcrest-184 Street Station, Surrey

Hillcrest-184 Street Station in Surrey, unlike the other selected TOAs, does not yet have an active SkyTrain station. The TOA is in a lower density suburb in one of the fastest-growing municipalities in the region that is driven by pro-growth Councils and policies. Examining Hillcrest allows us to explore how municipalities plan for TOD in anticipation of future infrastructure, rather than responding to an existing transit hub.





TOA Profile:

Edmonds Station

Overview

Edmonds Station is in the southwest corner of one of four “town centres” designated by the City of Burnaby’s OCP. These town centres are intended to be areas with relatively high densities that are implemented through local plans including the Edmonds Community Plan first adopted in 1994. While Edmonds has not been developing as rapidly or as densely as Burnaby’s other town centres—Metrotown, Brentwood, or Lougheed—there is currently a mix of newer mid and high-rise buildings constructed in the past 20 years, and older apartments, townhomes, and detached homes.

The TOA is bisected by Byrne Creek Ravine, the western portion of which is surrounded by Byrne Creek Ravine Park, a large, forested area with a network of walking and cycling paths. The creek houses an important ecosystem which supports local flora, houses Cutthroat Trout and was previously threatened by nearby development. Concerns about development harming the creek were raised in 2008, resulting in an agreement with the developer of a high-rise developer to restore and protect nearby portions.

While the area has already been developing and densifying, there are significant environmental constraints to development and connectivity limits to which the TOA legislation can be practically realized. In addition, commercial services are sparse in the area, concentrated almost entirely along the north edge of the TOA boundary.



Policy Context

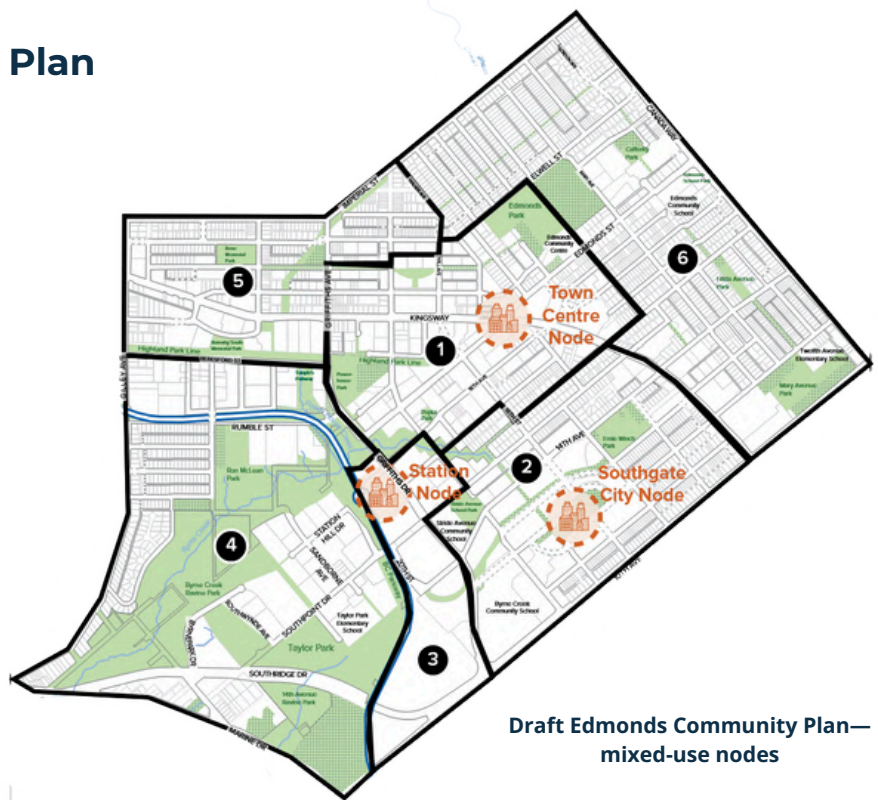
Draft Edmonds Community Plan

The first Edmonds Community Plan was adopted in 1994, but in 2023, before the housing mandates were announced, the City of Burnaby began the process of updating it [17]. A draft of the plan was released in spring, 2024 after several rounds of community engagement, which identifies three “high-density, mixed-use nodes” to be developed within the neighbourhood boundary, including one directly surrounding Edmonds Station. The City’s objective for these nodes is to support a full spectrum of housing typologies; however, this plan may be disrupted by Bill 47, as the legislation entitles developers to building heights and densities that are not representative of the “mix” desired by the City, which includes low-rise buildings and townhomes.

The draft plan also includes measures of accommodating more residents and increasing livability by expanding natural amenities such as parks and trails, and identifying sites for new schools in conjunction with the Burnaby School Board.

Burnaby 2050 public engagement four key themes:

1. Need for investments in transportation infrastructure
2. Support for protecting parks and green spaces
3. Support for higher building heights
4. Concerns about loss of detached single-family homes



Draft Edmonds Community Plan—mixed-use nodes

City of Burnaby OCP

Like the Edmonds Community Plan, the City of Burnaby’s OCP is also several decades old, having been adopted in 1998, and is also in the process of being updated [18]. The OCP outlines the City’s concept of “Town Centres,” which are distinct land use areas with unique development guidelines, scheduled for relatively high densities and mixed-uses. These town centres are contrasted with “Urban Villages,” scheduled for medium densities and intended to act as transition zones between the high-density town centres and other Burnaby neighbourhoods predominantly made up of detached homes.

There is no publicly available draft of the updated OCP—*Burnaby 2050*—but a report summarizing public engagement on the Land Use Framework identified four key themes (shown on right). Community members expressed support for higher densities and building sites in areas close to transit, but also expressed concerns about overcrowding, limited green space, constant construction, and the quality of public transportation including bus service and a lack of separated bike paths.

Interim Housing Needs Report

Bill 44 includes a requirement that all municipalities complete an interim HNR using a standardized method created by the Province. Municipalities were required to complete these interim HNRs by January 1, 2025. Burnaby's HNR identified a **need for 22,724 units of housing by 2026** [19], which is almost three times as many units (8,080 units) as were identified by the City's previous HNR, published in 2021 [20]. The report also identified a **need for 74,051 units by 2041** (20-year housing need projections were not previously required to be included in HNRs).

HOME: Housing and Homelessness Strategy

The **Housing and Homelessness Strategy (HOME)** [21] was released in December 2021 as a result of the Mayor's Task Force on Community Housing and the 2021 HNR. This ten-year strategy focuses on five goals: (1) inclusive and livable neighbourhoods, (2) options for secure housing tenure, (3) a renter-friendly community, (4) a healthy supply of non-market housing, and (5) a place where homelessness is rare, brief, and one time. The strategy separates the next ten years (2021-2031) into 3 phases, each with a list of specific actions to undertake during the phase.

Rental Use Zoning Policy

The City of Burnaby's **Rental Use Zoning Policy** [22] is built on four pillars aimed at securing long-term market and non-market rental stock, particularly for low to moderate income households. The policy mandates a 1:1 replacement of rental units after redevelopment, requires the inclusion of affordable rental units in new multi-family zoning applications, and encourages the creation of rental housing through the use of unused commercial density. All existing purpose-built rental housing is also rezoned to rental-only zones to provide long-term protection from conversion to strata ownership.

Tenant Assistance Policy

This policy assists tenants of family market rental buildings who are displaced from their homes due to major renovation or redevelopment [23]. In the wake of the provincial housing legislation, on April 29, 2024, a motion was brought forth in a council meeting for staff to examine the feasibility of extending the policy to protect tenants in secondary market rentals from displacement due to redevelopment. Currently, the policy only protects tenants in purpose-built rentals and secondary rentals that have fewer than five units that are being consolidated into a larger development.

Key Statistics

Population

- **Total Population:**
 - TOA: 24,582 (2021)
 - Burnaby: 249,125 (2021)
- **Households:**
 - TOA: 10,690
 - Burnaby: 101,136

Demographics

- **Visible Minority Population:**
 - TOA: 18,015 (73.3%)
 - Burnaby: 166,690 (66.9%)

Walkability

- Medium

Income & Shelter Costs:

- **Median Household Income:**
 - TOA: \$79,304
 - Burnaby: \$83,000
- **Median Shelter Cost of Rental Units:**
 - TOA: \$1,335/month
 - Burnaby: \$1,490/month
- **Households Spending More Than 30% of Income on Shelter Costs:**
 - TOA: 2,675 (25.0%)
 - Burnaby: 24,960 (24.8%)
- **Median value of ownership dwellings:**
 - TOA: \$689,052
 - Burnaby: \$980,000

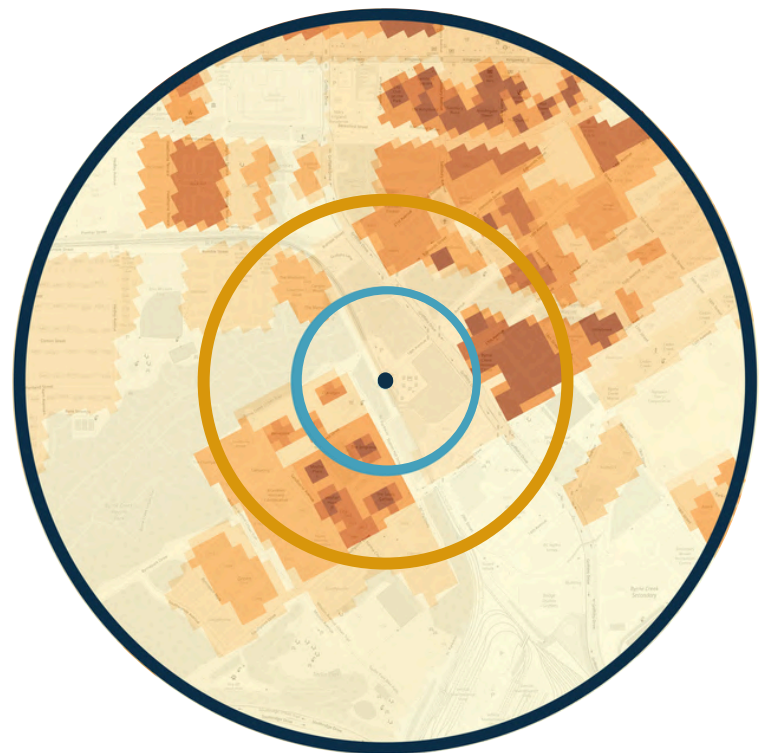
Population Density

Of the three sample TOAs, Edmonds Station has the highest population density, with an average of **5,972 residents per square kilometre**. Several relatively recent highrise developments have been built within the last 20 years, including the “City in the Park” development comprising seven residential towers directly to the southwest of the station and several separate mid- and high-rise developments to the east. Most of the population density is concentrated towards the northeast edge of the TOA, along the major commercial strip bordering Kingsway. Outside of these areas, the residential zones in the TOA comprise a mix of low-rise apartments and attached and detached ground-oriented buildings.

Nearly all the commercial services within the TOA are located along the northern edge, adjacent to Kingsway.

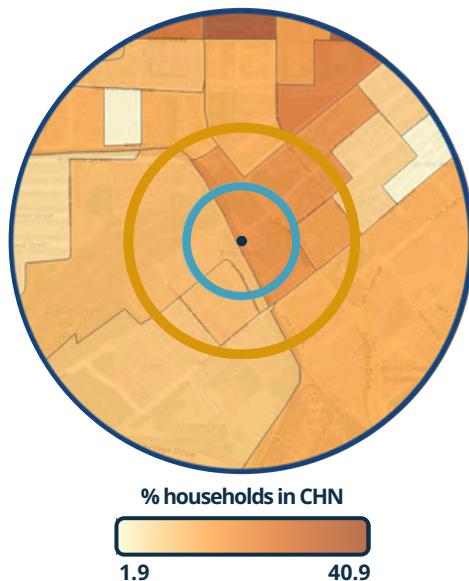
A large portion in the southwest is occupied by part of a major SkyTrain storage and maintenance facility, and Byrne Creek Ravine Park bisects a large portion of the area from east to west—creating barriers to compact urban form and walkability.

Two large sites owned by BC Hydro occupy the strip of land directly adjacent to the station to the east within the 200m tier. Although these sites would be ideal locations for transit-oriented residences, BC Hydro’s ownership and use of the land restrict this possibility.



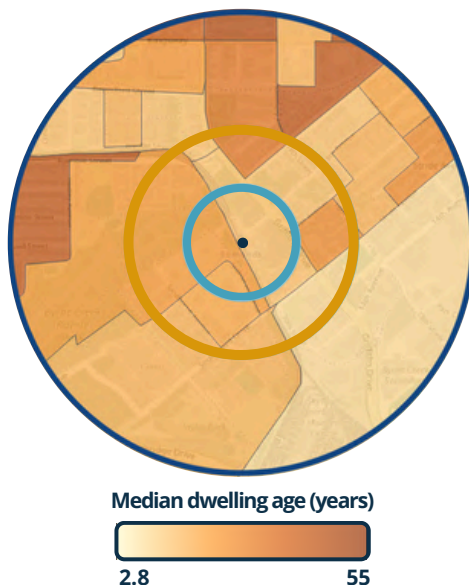
Percentage of Households in Core Housing Need

Approximately **25.0% of households within the Edmonds Station TOA are in CHN**. This is significantly higher than for all of the City of Burnaby, in which just 17.7% of households are in CHN. This is likely a result of a higher presence of older buildings which are less likely to meet suitability standards, and lower household incomes than the City as a whole. While much of the CHN is located along the north edge of the TOA boundary, there are still significant portions in the areas directly adjacent to the station.



Median Age of Residential Buildings

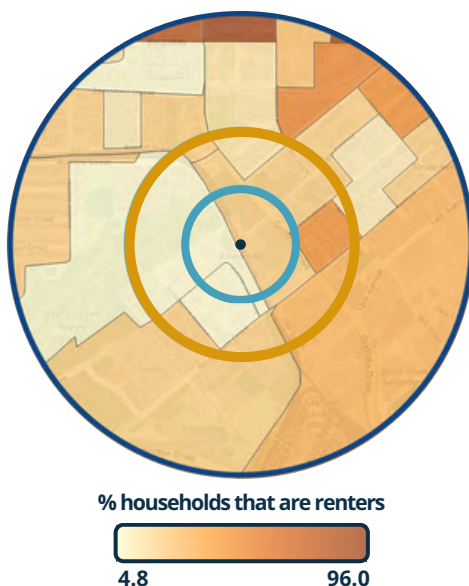
The approximate **median age of residential buildings within the TOA is 28 years**. 17.7% of buildings were constructed 50 or more years ago, surpassing an estimation from real estate blog Square Yards, that the **average lifespan of wood-frame residential buildings is 40 years** [24] (data regarding the age of buildings at the point of demolition is scarce). This means that many of the older, wood-frame buildings have a higher likelihood of redevelopment, and, compared to population density, many of these buildings are low-rise apartments or semi-attached or detached homes.



Proportion of Renter Households

About **35.7% of households in the Edmonds Station TOA are renter households**, which is slightly lower than the City-wide percentage of 39.5%. Furthermore, compared to the map above, renters around Edmonds Station are more likely to live in an older building.

Together, these statistics paint the picture that, in the Edmonds Station TOA (and in particular the area to the northeast of the station) there are relatively high proportions of rental units in older buildings and a significant need for housing throughout the area.



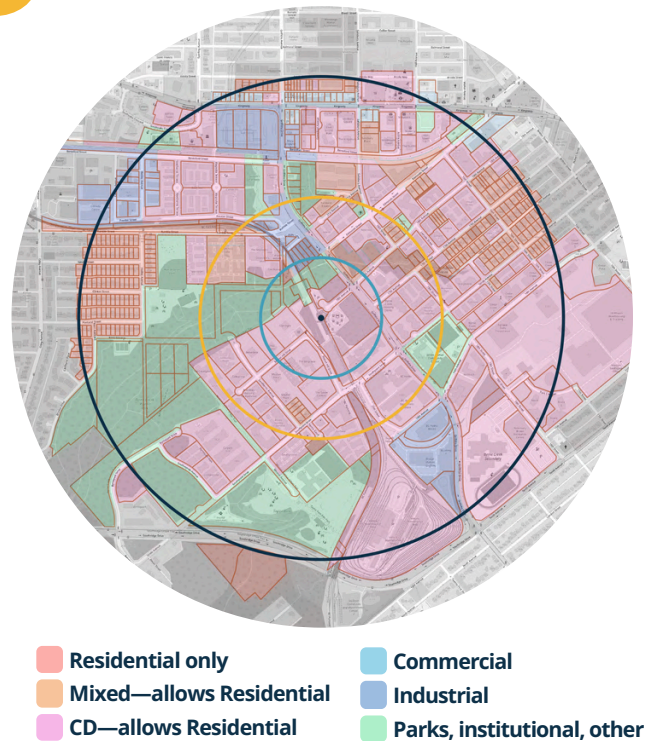
Zoning & Land Use

Land area zoned to allow residential uses: 1,235 km²

Much of the Edmonds Station TOA is dominated by a Comprehensive Development (CD) District associated with Edmonds' designation as a "Town Centre." The Draft Edmonds Town Centre Community Plan states zones within this district are intended to allow for a wide range of housing types and densities, and mixed-use developments.

This district is highly conducive to the intent of Bill 47 to encourage higher densities close to transit, and we heard from municipal planners that the legislation does not significantly diverge from existing plans for the area.

Currently, there are sparse commercial areas within the TOA. Having zones slated for mixed-use development may alleviate this issue, but the City will need to ensure this development is realized to create a more complete community around the station.



Potential for New Housing

Current number of units: 7,150

Units allowable according to density thresholds: 40,208

The Edmonds Station TOA is the most built-up and dense TOA of our samples, with over twice as many units as Hillcrest-184 Street and Moody Centre and quite a few high-rise developments.

Still, there is a large potential for new housing. If zones that allow residential uses were to be built up to the TOA density thresholds, the area would see over 40,000 new units. This represents more than half of the entire City of Burnaby's 20-year housing need (74,051 units) identified in the interim HNR published in October, 2024. Practically, many of these parcels are not suitable for residential development for the foreseeable future. For example, the irregular parcel on the southern edge of the TOA is occupied by Translink's Operation and Maintenance Centre—critical to maintaining and storing its vehicles.

Nevertheless, there are many low-density residential areas close to the station, making for a relatively high potential for new TODs.



Challenges & Opportunities

Phase 2 Challenges

- **Missing Local Contexts—Barriers to Walkability:** Many physical constraints—hilly terrain, Byrne Creek Ravine Park, Griffiths Drive, and industrial lands—disrupt pedestrian connectivity to the station. Pedestrian safety is a concern due to poor pedestrian infrastructure and station isolation.
- **Improved Needs Assessment—Capacity Concerns:** It remains difficult to predict where infrastructure improvements are necessary or urgent until developments are proposed. In anticipation of the increased density, Burnaby has already proposed park expansions in the area.
- **Neighbourhood Character—Tower Fatigue:** Burnaby has prioritized high-density developments in four key town centres, including Metrotown, Brentwood, Lougheed and Edmonds. Some residents are experiencing “tower fatigue” and are tired of consistent construction.
- **Protection for Low-Income & Vulnerable Populations—Rental Housing Challenges:** It was noted that implementation of Burnaby’s rental use rezoning policy would be challenging given the current market conditions.

Phase 2 Opportunities

- **Facilitated Housing Development—Height-Based Framework:** In October 2024, Burnaby City Council endorsed a new height-based development framework that will replace the current system based on FAR density. This change aims to simplify regulations, speed up approvals, and allow for flexible urban design.
- **Compact Urban Growth—Developing Mixed-Use Nodes:** Edmonds TOA has contains many mixed-use areas and is home to a community centre, library, schools, and parks. Edmonds Community Plan also identifies 3 mixed-use nodes. With a range of amenities, facilities, and mixed uses, Edmonds already has the foundations in place and is well-positioned to support increased residential growth compared to other TOAs.

A photograph of a transit station area under a clear blue sky. In the foreground, there's a paved road and a sidewalk. A person is walking on the sidewalk. In the background, there's a parking lot with several cars, a transit station building, and a large multi-story building. Utility poles and wires are visible. A yellow semi-circle is in the top right corner.

TOA Profile:

Moody Centre Station

Overview

The Moody Centre Station replaced the previous Port Moody Station on the West Coast Express line. As part of Translink's Evergreen Extension—adding 6 new stations to the Millennium Line—the new station served as a stop on the Evergreen Line and the West Coast Express. It opened on December 2, 2016. This station, served by two rapid-transit lines, connects residents to jobs and services—making it a particularly valuable location for increasing housing within the TOA.

Moody Centre has diverse land uses and distinct physical characteristics that challenge the concentric circle approach. The land north of the train tracks is constrained by Burrard Inlet, large public park space, waterfront industrial and light industrial and commercial space that runs on the only east-west collector north of the train tracks, Murray Street. South of the tracks, near the station, land use is a mix of light industrial and parking lots, while commercial space centres on the main arterial road, St. John's Street. The residential area within the TOA is south of the station and is built up into the steep slope, the typology consists of single detached homes, townhomes and small apartments.

Moody Centre Station TOA is encompassed in two Port Moody Neighbourhood Plan Areas within the OCP—Moody Centre and the Evergreen Line Sub Areas, the latter includes Spring Street Promenade, Murray Street Boulevard, Oceanfront District and Moody Centre Station Transit-Oriented Development sub-areas.



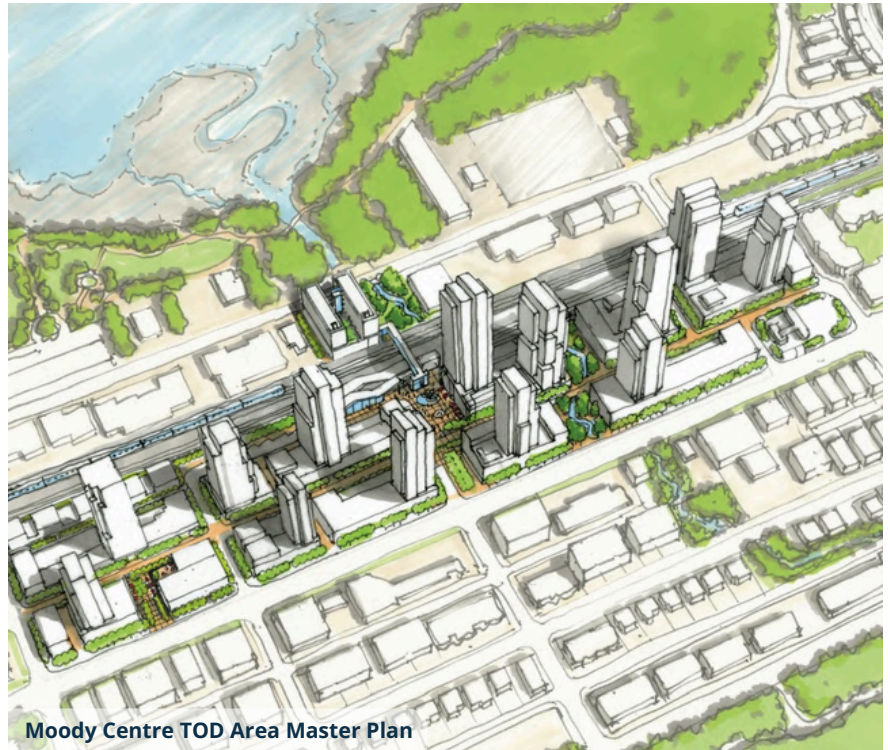
Policy Context

City of Port Moody OCP

Port Moody's OCP was published in 2014 [25], and preceded the TransLink Evergreen Extension that connected Moody Centre to the Millennium Line. In anticipation of the extension, public engagement was conducted and participants were asked to envision future developments within a 400 and 800m radius of the station.

The OCP designated Moody Centre Station as a TOD area that will contain a mix of residential, commercial, cultural, institutional, recreational, and office uses. Building height was not to exceed 26 storeys in the area. The OCP highlights goals to encourage higher-density mixed commercial and residential developments to create a diverse, complete community. On the other hand, preservation of cultural assets and alignment with heritage character was also emphasized.

The OCP is in the process of being updated in preparation for Port Moody 2050, which sets to guide the evolution of the City over the next 30 years. On February 21, 2024, engagement for Port Moody 2050 was paused so the City can examine the impacts of the newly introduced housing mandates.



Moody Centre TOD Area Master Plan

Moody Centre TOD Area Master Plan

In 2017, Port Moody City Council requested the creation of a TOD master plan for the Moody Centre area. A working group of the nine property owners was formed to plan the Neighbourhood Plan Area. On November 28, 2017, the vision for the Master Plan was incorporated into Port Moody's Official Community Plan. The Master Plan [26] demonstrates an effort towards TOD preceding the housing mandates.

The Master Plan is within, but does not fully encompass Moody Centre Station TOA. It represents a key, seven-block area within the TOA 200m tier, north of St John's and south of the railway. The Plan proposes significant changes to the low-density industrial area and seeks to create a mixed-use neighbourhood complete with offices, retail, amenities, green space, improved pedestrian connectivity and between 3,200 and 4,135 residential units. It will rezone some light industrial lots to encourage higher density residential, with some proposals significantly exceeding the TOA minimum height and density thresholds at around 36 stories.

Interim Housing Needs Report

Port Moody's Interim HNR [27] identified the need for **3,063 new units in the next 5 years** (from 2024), and the need for **9,796 new units in the next 20 years**. These numbers are based on estimations that Port Moody is expected to have a population of 50,000 by 2041 (increase of 16,465 from 2021).

Housing Action Plan

The City of Port Moody completed its Housing Action Plan in 2022 [28]. The Plan aims to address the housing gaps and needs identified in Port Moody's 2021 HNR, and outlines 73 actions to create more affordable housing opportunities in the City over the next decade. These actions are categorized under 4 strategic directions: (1) Improve Affordability, (2) Catalyze Rental Housing, (3) Diversify Housing, and (4) Be a Housing Champion. TO date, 33 actions have been completed. The City of Port Moody has several policies aimed at developing and protecting affordable housing, as outlined in the Housing Action Plan: The **Tenant Relocation Assistance Policy** outlines a notification and financial compensation process for tenants who may be displaced by redevelopment. The **Rental Protection Policy** discourages demolitions of rental housing and encourages replacing existing rental units as part of redevelopment. The **Affordable Housing Reserve Fund** allocates a third of all CAC collected to the Affordable Housing Reserve Fund. The **Inclusionary Zoning – Affordable Rental Units Policy** was introduced in 2022. It requires projects over 2.0 FAR to integrate below-market rentals for up to 15% of residential FAR, but it does not apply to developments that are 100% market-rental.

Master Transportation Plan

Port Moody's Master Transportation Plan [29], **TransPort Moody**, was approved in 2017 and guides transportation planning, land use decisions, and public investments over the next 20 years. The plan has 6 key policy directions: (1) a compact, complete city, (2) a walkable city, (3) bicycle friendly city, (4) a transit oriented city, (5) moving people and goods, and (6) a safe and livable city.

The Plan sets 3 targets to achieve by 2045:

- Double the proportion of trips—from 20% to 40%—made by residents via walking, cycling, and transit
- Reduce the average vehicle distance driven by 30%—from 10 km per day per capita to 7km)
- Reduce traffic-related injuries and fatalities, aiming to eliminate all transportation system fatalities

As Bill 47 permits increased densities to promote TOD around SkyTrain stations, it directly supports direction four of the Plan and indirectly supports the other five directions in facilitating a compact, walkable, and bicycle-friendly city. Bill 47 would also help the City achieve the 3 targets by reducing the need for vehicle travel and encouraging active and public transportation.

Key Statistics

Population

- **Total Population:**
 - TOA: 9,675 (2021)
 - Port Moody: 33,535 (2021)
- **Households:**
 - TOA: 4,415
 - Port Moody: 13,110

Demographics

- **Visible Minority Population:**
 - TOA: 3,085 (31.9%)
 - Port Moody: 10,930 (32.6%)

Walkability

- Medium

Income & Shelter Costs:

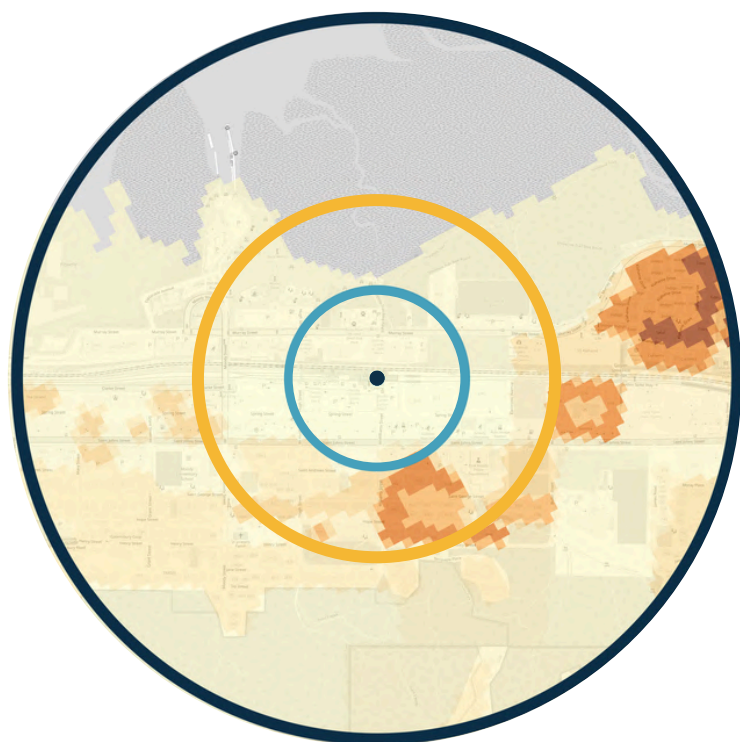
- **Median Household Income:**
 - TOA: \$103,622
 - Port Moody: \$115,000
- **Median Shelter Cost of Rental Units:**
 - TOA: \$1,641/month
 - Port Moody: \$1,700/month
- **Households Spending More Than 30% of Income on Shelter Costs:**
 - TOA: 930 (21.1%)
 - Port Moody: 2,545 (19.4%)
- **Median Value of Ownership Dwellings:**
 - TOA: \$810,779
 - Port Moody: \$1,000,000

Population Density

Of the three TOAs, Moody Centre Station has the second-highest population density, with an average of **2,070 persons per square kilometre**. The TOA has a highly diverse land use mix. Most residential areas can be found south of Barnett Highway or within pockets of Comprehensive Development zones in the eastern TOA, north of the tracks. Housing typology within the TOA is diverse, with a mixture of single detached houses, duplexes, row houses, and low-rise apartments and condos.

With many non-residential parcels, much of the TOA is unavailable for housing development.

To the north, a considerable portion of the TOA covers the Burrard Inlet. Rocky Point Park takes up the entirety of the shoreline, offering various public amenities. There are enormous parking lots surrounding the station within the 200m tier. Many other parcels within the 200m tier, and the TOA largely, are zoned as industrial. A considerable portion of the southern part of the TOA circle is a steep hillside and forest and is officially zoned as Public Service land. These physical limitations hinder the amount of developable land within the TOA.



Persons per square kilometre

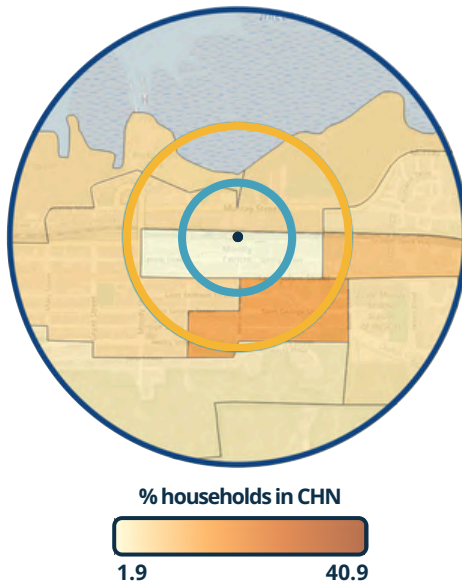


97

25,000+

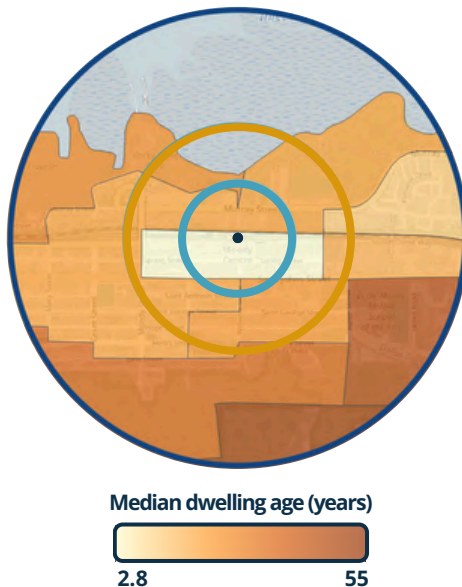
Percentage of Households in Core Housing Need

Approximately **21.1% of households with the Moody Centre TOA are in CHN**, higher than the average for Metro Vancouver. Of the TOA households, 20.8% of households spend more than 30% of household income on housing. This is a factor of the higher TOA **median household income of \$103,621**. In contrast, the median shelter cost for a rental unit is the highest of all three TOAs studies at \$1,641. Port Moody projects a housing need of 9,796 units over the next 20 years, including 518 units needed to reduce extreme core housing need. It also includes 467 to reduce suppressed household formation and 979 to meet local demand, which can help create more suitable housing options.



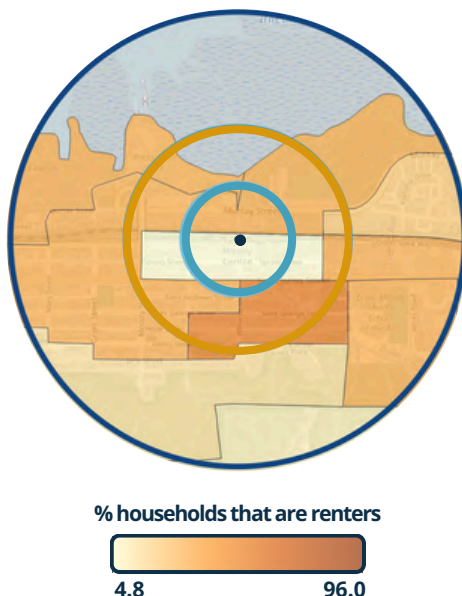
Median Age of Residential Buildings

The approximate **median age of residential buildings within the TOA is 25 years**, nearly equivalent to the median building age within the Edmonds Station TOA. However, in contrast to Edmonds and Hillcrest, Moody Centre has a significantly higher proportion of residential buildings over 55 years old—26.1% of all residential buildings. The TOA has experienced consistent development over the decades, with 57.6% of residential buildings constructed within the last 17 years. Aging housing stock can be a strong indicator for potential redevelopment; however, the areas with the oldest buildings are also furthest away from the station, and overlap with the areas that have the lowest rates of CHN.



Proportion of Renter Households

Approximately **33.5% of households in Moody Centre TOA are renters**, and the other 66.5% are owners. The TOA has a significantly higher proportion of renters compared to the rest of the City, where 24.5% of households are renters. In this TOA, renter households are concentrated closer to the station, particularly south of the station within the 400m tier of the TOA. This concentration of renters aligns with the higher rates of CHN. This proximity to the station and the Moody Centre TOD Area Master Plan, indicates increased vulnerability to tenant displacement as development activity intensifies.

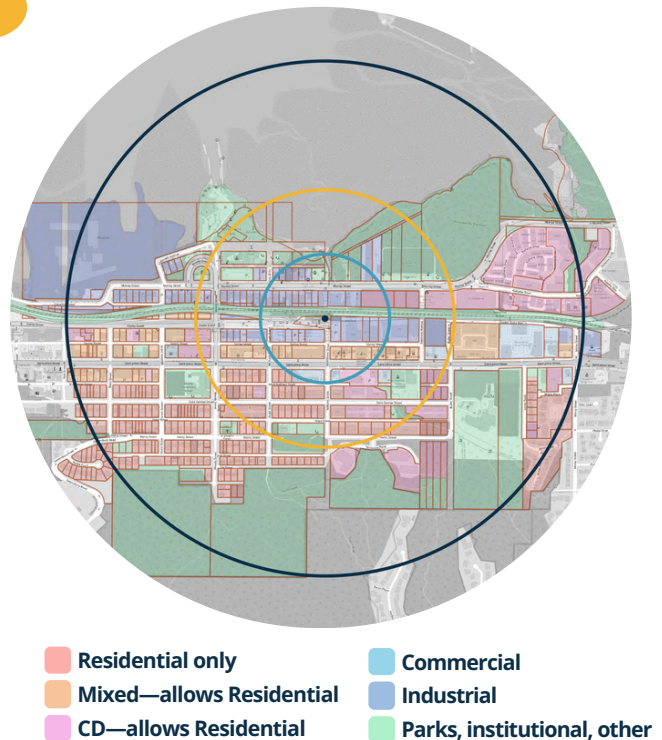


Zoning & Land Use

Land area zoned to allow residential uses: 1,002 km²

According to Metro Vancouver's 2021 Walkability Index, Moody Centre is highly walkable, due in part to a high diversity of land uses. Unfortunately, this does not perfectly reflect the on-the-ground experience of the area. The simplified zoning map, and our site visits, reveal that, while there is a mix of uses in the area, these uses are not integrated in a way that supports walkability. An overview of our site visit findings and a link to a map of accompanying photographs can be found in [Appendix 2](#).

The parcels immediately adjacent to the station in particular are dominated by industrial zoning, and the nearest commercial area consists of car-oriented developments facing Saint John's Street—a major thoroughfare. While the station itself has a park and ride facility, pedestrians must navigate industrial areas to reach it. The City's TOD Master Plan aims to address this particular issue, but as it stands, the TOA is not particularly walkable.



Potential for New Housing

Current number of units: 2,486

Units allowable according to density thresholds: 29,147

Moody Centre Station has the lowest potential for new housing of all sample TOAs. The two main drivers of this fact are the relatively low land area dedicated to residential uses, and the fact that units in multifamily buildings in Port Moody have far higher average sizes than in Burnaby and Surrey.

However, Port Moody is unlikely to suffer from this lack of potential, as 29,147 units represents just less than triple the City's 20-year housing need of 9,796 units. The potential also represents housing for enough people to more than double the 2021 population of the City (33,535 residents)—assuming the regional average of 2.1 persons per household according to the Canadian Census.

Outside of the specific context of Port Moody, the lack of potential reveals an important factor for other cities to consider: a lack of zoning that allows residential uses is going to inhibit the legislation's ability to supply housing. If the City aimed to preserve its commercial and industrial areas while enabling densification, more widespread mixed-use zoning would increase the potential.



Challenges & Opportunities

Phase 2 Challenges

- **Missing Local Contexts—Concentric Circle Model:** The concentric TOA encourages high growth in areas that are not suitable or practical, disregarding local needs and constraints.
- **Ability to Accommodate Growth—Traffic & Transit Management:** Both Port Moody TOAs combine to cover a considerable portion of the City, including main arterials. The ability to provide efficient traffic and transit management is a concern.
- **Ability to Accommodate Growth—Maintaining a Standard of Liveability:** The geographic constraints require Port Moody to strategically acquire land for future amenities, facilities and parks to ensure liveability.
- **Missing Local Context—High Land Use Mix:** The TOA has a considerable portion of the city's industrial area. There are concerns over the future existence and operation of these areas within a dense residential area.
- **Missing Local Context—Train Tracks:** The CPR and SkyTrain tracks bisect the TOA and restrict north-south connectivity and accessibility, hindering the vision of a complete and accessible community.
- **Topographical Concerns around TOAs—Physical Constraints:** Large portions of the TOA span the Burrad Inlet to the north and a steep hillside to the south.

Phase 2 Opportunities

- **Compact Urban Growth—High Density Corridor:** Moody Centre TOA significantly overlaps with Inlet Centre TOA to encompass the majority of the downtown area of Port Moody. There is a substantial opportunity to make a high density corridor along St. John's St. and Barnett Hwy.
- **Improved Needs Assessment—Prioritizing Pedestrian Connectivity:** Moody Centre TOD Area Master Plan has proposed to build a north-south pedestrian overpass right over Moody Centre Station. This should be prioritized amidst the proposed density changes to the Neighbourhood Area Plan and the TOA to increase accessibility to transit, decrease reliance on vehicles, and promote liveability.



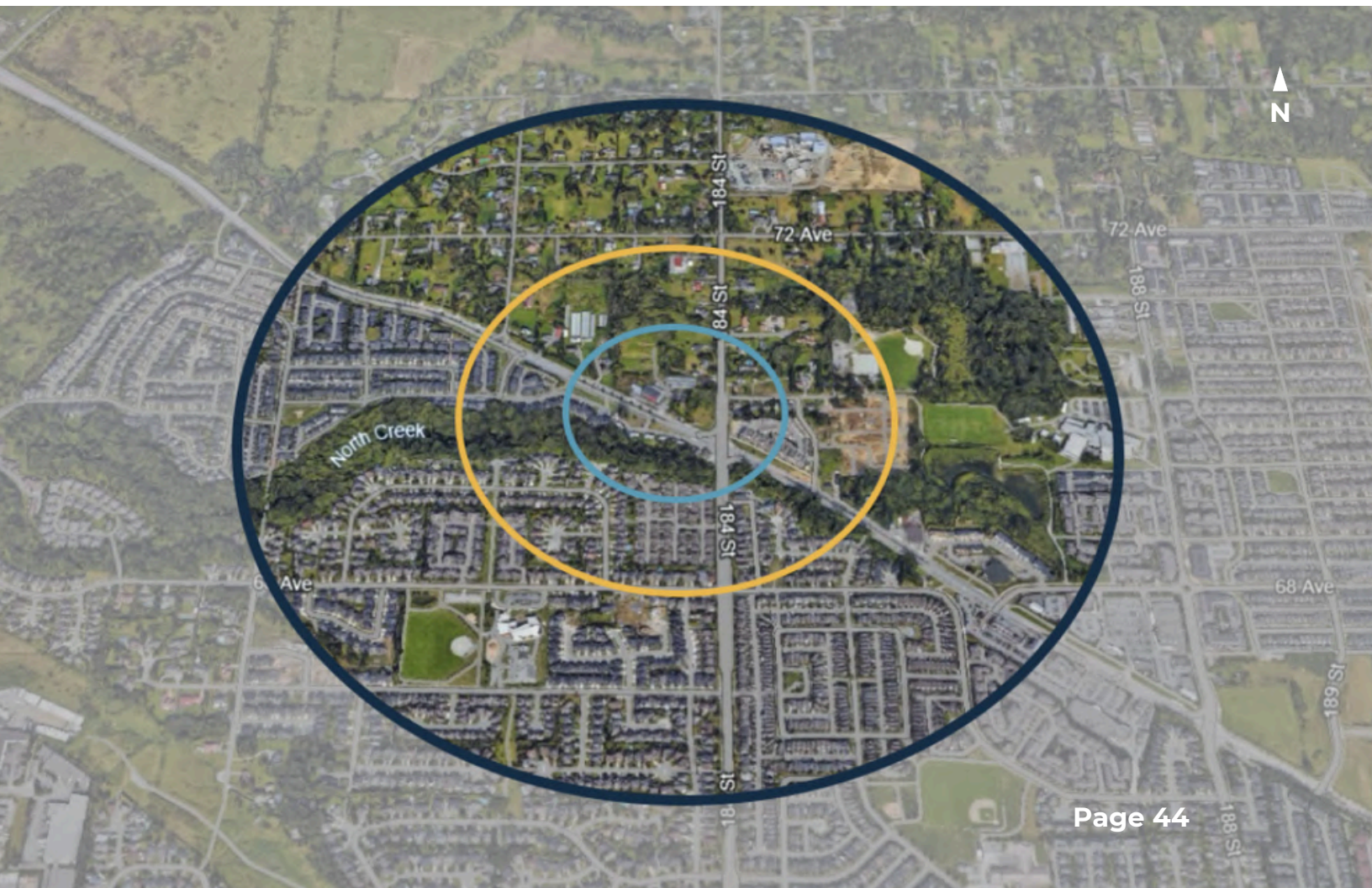
TOA Profile:

Hillcrest — 184 Street Station

Overview

The Hillcrest-184th Street Station is part of the TransLink's Surrey-Langley SkyTrain extension project of the Expo Line that is slated to finish in 2029. The Hillcrest station is at the nexus of four area plans within Surrey's Cloverdale community and is one of two centres within the future Clayton Corridor Plan. The Hillcrest TOA is a growing suburban area dominated by single-detached homes and RA, CD and CD, R1, R3 and R4 zoning, developed in the late 1990s. The station, positioned at the intersection of the main arterial Fraser Highway and 184th Street, is defined by the winding subdivisions within the North Cloverdale West and North Cloverdale East Neighbourhood Concept Plans and the large (previously) single-family lots that are part of the West Clayton and East Clayton Neighbourhood Concept Plans.

Compared to the City of Surrey, the community of Cloverdale has a larger proportion of owners, a higher median house income and lower core housing need. Cloverdale contains more single-family dwellings and townhomes than the city average, but fewer apartments. Its lower population density, uniform urban form, limited commercial space and poor pedestrian and bike infrastructure contribute to the TOA low walkability.



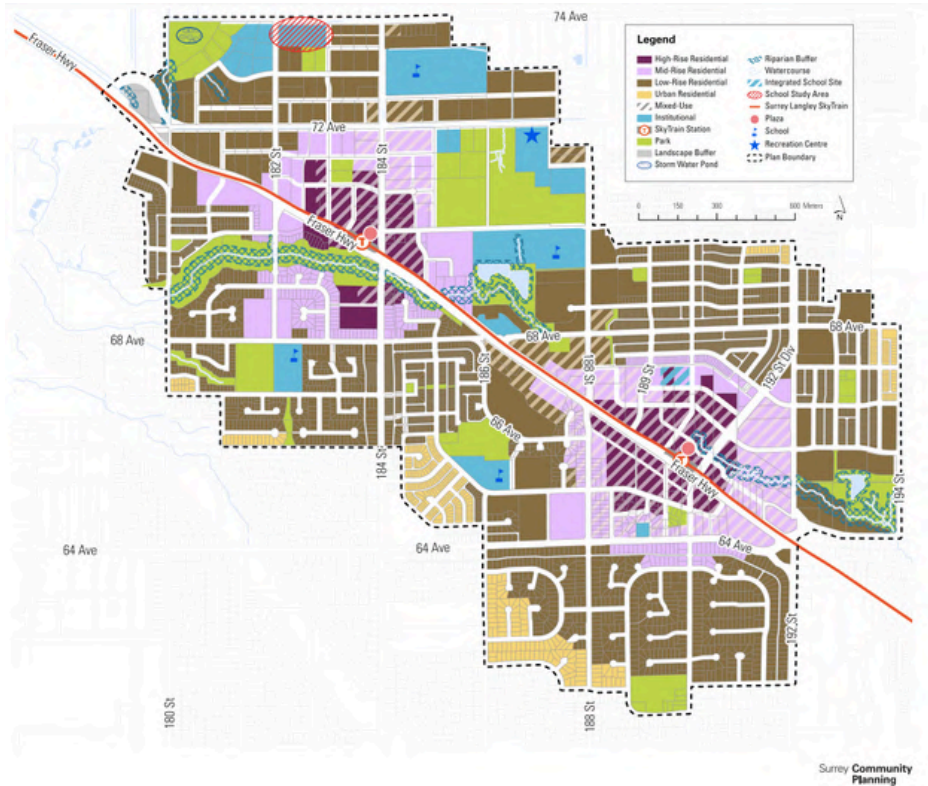
Policy Context

Clayton Corridor Plan

The Clayton Corridor Plan [30] is a draft TOD land use plan, pursued in 2019 from a Council directive. The Plan seeks to propel Clayton as an urban centre through a transportation concept, a parks and schools concept and a land use plan. The plan seeks to enhance the public realm through improved connectivity, mixed-use development and securing community amenities such as parks, open spaces,

This planning process was disrupted by Bill 47. The plan area expanded three-fold to include Hillcrest-184 Street and Clayton Station TOAs. The original plan was focused on the North side of Fraser Highway and covered less than a quarter of the Hillcrest-184 Street TOA. The plan always aimed to focus taller buildings with higher densities near the two stations, but the Hillcrest-184 Street Station had the lowest designated density of all Surrey SkyTrain areas.

The Clayton Corridor Plan is still in its engagement process but recognizes eliminating parking requirements will lower construction costs, potentially supporting rental and affordable housing development, a goal of the OCP.



City of Surrey OCP

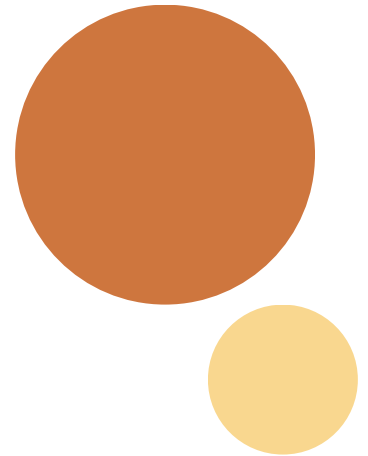
The City of Surrey's current Official Community Plan was developed in 2014 [31]. A key aim of the OCP was to shape and connect its six communities, their urban centres and employment areas with frequent transit corridors. A subsection of the plan—'Centres, Corridors and Neighbourhoods'—encourages higher density residential, commercial and mixed-use development along the SkyTrain corridor. Specifically, high density residential was targeted within 800m of rapid transit stations, and mixed use development zoning within 400m of the SkyTrain. One policy aim was to develop a 10-year engineering servicing plan, that accounts for future servicing needs of the growing city.

Interim Housing Needs Report

Surrey's Interim HNR identified the need for 53,111 new units in the next 5 years (from 2024), and the need for 169,221 new units in the next 20 years [32]. This is a 168% increase from the City's estimates in 2021. Approximately 70% of this demand is slated to come from projected population growth. To meet the findings of these reports, Surrey has reviewed its Rental Premises Standards of Maintenance bylaw, updated their Development cost charge Bylaw to exempt non-profit housing, adopted A Pathway Home (homelessness prevention and response plan) and collaboratively built 728 nonmarket rental units since 2024.

Affordable Housing Strategy

The City of Surrey passed the Affordable Housing Strategy in 2018 [33]. It aims to prevent the loss of purpose-built rentals, encourage the development of purpose-built rentals, increase the supply of non-market rentals, and strengthen tenant protection. This Strategy, and the development of new affordable rental units, is funded by the **Affordable Housing Contribution** community amenity contribution (CAC). The Affordable Housing CAC is \$1,113.92 per residential unit and applied to every residential rezoning. Bill 47's density threshold may limit the amount of rezonings required in Surrey TOAs. and therefore reduce the potential funding, however, Surrey's general appetite for more density and height will mean the Affordable Housing CAC will still be exercised. The **Rental Housing Redevelopment Policy** requires the redevelopment of a purpose-built rental site to replace all existing rental units with at least the same total number of bedrooms as the original development. This policy also requires tenant details to be documented before redevelopment and financial compensation and relocation assistance to be provided.



Supportive Policy Agreement

In 2020, the City of Surrey signed the **Supportive Policies Agreement** with TransLink, shaping the future of Surrey's TOD planning along the Surrey-Langley SkyTrain corridor [34]. The agreement outlines how land use policies will support growth around future SkyTrain stations to align municipal planning with regional transportation objectives. It emphasizes diversifying the housing stock, preserving rental stock and encouraging purpose-built rentals along the corridor. The agreement also prioritizes equitable and affordable access to housing, employment, and services, identifying TOD as a key tool for improving affordability and social inclusion.

Inclusionary Zoning Bylaw

The City of Surrey has not yet developed an Inclusionary Zoning Bylaw. However, the Supportive Policy Agreement indicates the City began exploring inclusionary housing policy and rental tenure zoning. A February 2025 Council Report [35] shows the City has started work to develop policies related to inclusionary zoning and rental replacement.

Key Statistics

Population

- **Total Population:**
 - TOA: 14,031 (2021)
 - Surrey: 568,322 (2021)
- **Households:**
 - TOA: 4,433
 - Surrey: 185,671

Demographics

- **Visible Minority Population:**
 - TOA: 6375 (45.4%)
 - Surrey: 377,235 (66.4%)

Walkability

- Low

Income & Shelter Costs:

- **Median Household Income:**
 - TOA: \$125,227
 - Surrey: \$98,000
- **Median Shelter Cost of Rental Units:**
 - TOA: \$1,250/month
 - Surrey: \$1,300/month
- **Households Spending More Than 30% of Income on Shelter Costs:**
 - TOA: 765 (17.3%)
 - Surrey: 48,210 (26.0%)
- **Average value of dwelling:**
 - TOA: \$1,010,501
 - Surrey: \$1,000,000

Population Density

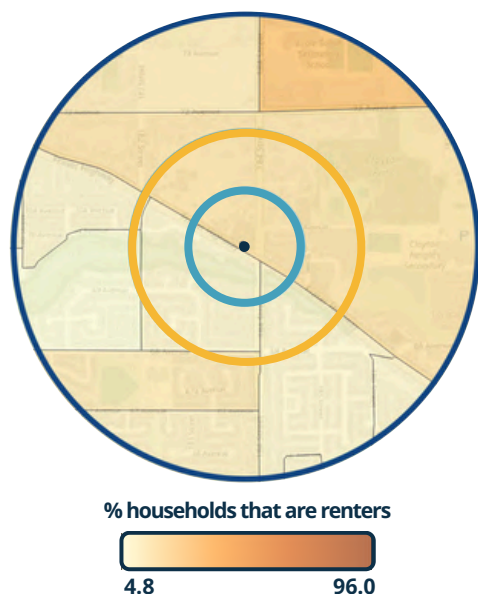
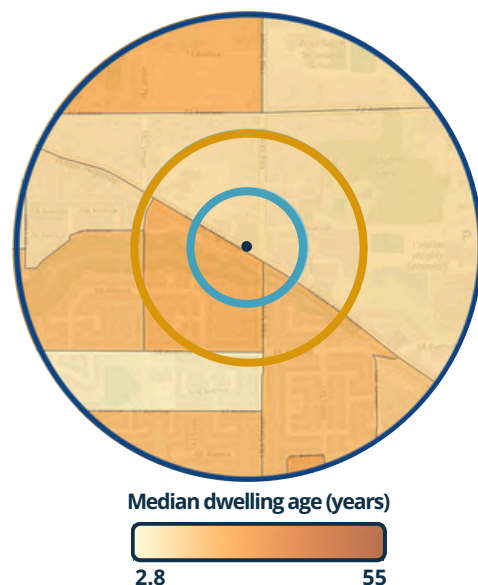
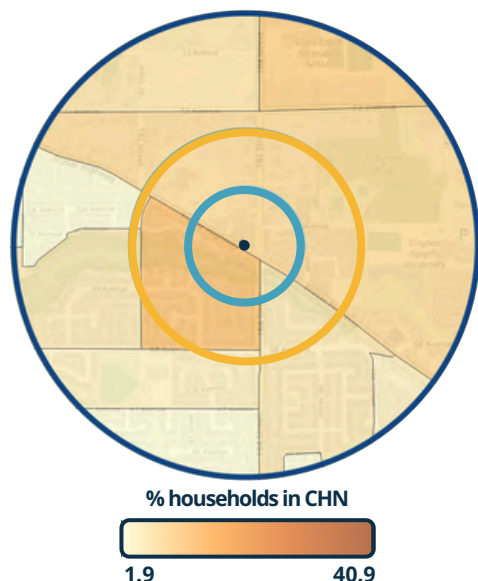
Of the three sample TOAs, Hillcrest-184 Street Station has the lowest population density, with an average density of **1,262 residents per square kilometre**, around one-fifth that of Edmonds Station. The low density is due to the typology, with 94% of the population living in single detached houses, semi-attached houses, duplexes, or townhomes, and less than 2% of the TOA population living in a building over five stories.

Large single detached home subdivisions developed on the south side of Fraser highway give the TOA extreme uniform density. This housing form dominates the TOA.

The higher density area on the western edge of the TOA—shown on this map—is due to smaller single detached home lots and one townhome complex. Other townhomes can be found in the southeastern edge of the TOA, and smaller clusters of townhomes exist in the northeastern edge of the 200m tier.

Small parts of the TOA are not viable for residential development. The North Creek waterway on the western edge, two primary and two secondary school sites and sporadic park space, including a section on the northeastern edge, prevent development in these areas.





Percentage of Households in Core Housing Need

The Hillcrest TOA has a lower rate CHN than the other sample TOAs and the City of Surrey. Affordability is particularly high, as just **17.3%** of households—compared to 26.0% of all Surrey households—spend more than 30% of their income on housing costs. This is likely due to exceptionally high incomes in the area. Households within the TOA earn a median of **\$125,227**. In addition to higher income, the median shelter cost for a rental unit is just under the city's average. Surrey projects a housing need of 169,221 units from 2024-2043, including 10,533 needed to reduce extreme core housing need. It also includes 12,847 to reduce suppressed household formation and 27,765 to meet local demand, which can help create more suitable housing options. Lower rates of CHN can indicate lower likelihood of displacement, possibly leading to more equitable development outcomes.

Median Age of Residential Buildings

Residential buildings within the TOA have a median age of **20 years**. The housing stock is fairly new with 59% of residential buildings constructed within the last 17 years, indicating low potential for large-scale redevelopment efforts in the short-term. On the other hand, just **6% of residences were built over 40 years ago**, beyond the average lifespan of wood-frame residential buildings. The recency of construction reduces the likelihood of redevelopment, which is more financially viable when buildings are approaching end-of-life.

Proportion of Renter Households

More than **85.2% of households are owners** in the Hillcrest TOA. This means that 14.8% of households are renter households in the TOA, this is significantly less than the city average, showing 30% of Surrey's population rents. This is in part due to the lack of primary rental housing stock in the area. The TOA is dominated by single detached homes, and although **89% of Surrey renters are renting in the secondary market**—renting single detached homes, secondary suites and condos—the area is not conducive to renting.

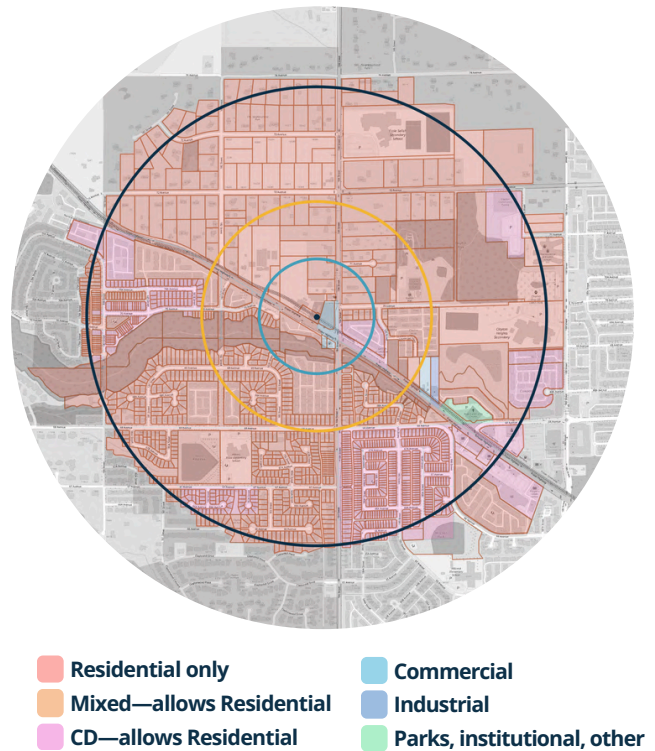
Zoning & Land Use

Land area zoned to allow residential uses: 1,631 km²

The area around the future Hillcrest-184 Street Station is almost exclusively zoned for residential uses. This reflects the current character of the surrounding neighbourhoods: single-family homes on a mix of quarter-acre and smaller, suburban lots, with sparse semi-detached houses and townhouses. Commercial spaces are relegated to a gas station and car-oriented strip-mall developments in the south east corner, along Fraser Highway.

The road layout is also reflective of the suburban character. Local streets frequently wind, and end in cul-de-sacs, with sparse connections to major roads.

While the expanse of residential zoning makes for a high potential for new units (see below), it also reflects a neighbourhood that is otherwise not conducive with transit-oriented development. If significant development were to occur at densities prescribed by the mandates, the City would need to make additional efforts to provide more services, develop commercial areas, and improve connectivity, especially to the SkyTrain Station, to ensure a more complete community.



Potential for New Housing

Current number of units: 2,179

Units allowable according to density thresholds: 69,130

Interestingly, while the Hillcrest-184 Street TOA has the most land area zoned for residential uses of all the sample TOAs, it simultaneously has the lowest amount of housing. These factors, combined with the fact that average unit sizes in Surrey are smaller than in Burnaby and Port Moody, makes the potential for new housing in the TOA exceptionally high—more than twice as many units as Edmonds, and more than three times as many units as Moody Centre.

Surrey's interim HNR identified a 20-year housing need of 169,221 units, meaning the TOA has the potential to account for 41% of the entire City's need.

Practically, however, it is unlikely that the TOA will be developed to nearly this degree. As the census data revealed, much of the housing in this area consists of relatively new single-family homes, on small lots, that are owner-occupied.



800 m tier: 3.0 FAR, 8 Storeys
400 m tier: 4.0 FAR, 12 Storeys
200 m tier: 5.0 FAR, 20 Storeys

Challenges & Opportunities

Phase 2 Challenges

- **Ability to Accommodate Growth—Mixed Land Use:** The TOA has extremely low land use diversity, providing little opportunity to develop commercial space and the services and amenities necessary to support livability.
- **Topographical Concerns around TOAs—Connectivity:** Winding street layout, large residential lots and North Creek limit pedestrian, connectivity to the station.
- **Capacity to Address Housing Need—Existing Housing Stock:** The area is relatively new, the housing stock is young, and there is a low level of renter households, these factors may mean its short-term development potential is low.
- **Neighbourhood Character—Existing Housing Stock:** The existing neighbourhood is extremely uniform and suburban. This sentiment can restrict the development of new, varied and denser housing typologies.
- **Protection for Low-Income & Vulnerable Populations—Rental Housing Challenges:** The area is dominated by single detached homes, with very low purpose-built rental stock and no municipal inclusionary zoning bylaw. These factors may discourage renter households from benefiting from the benefits of TOD.

Phase 2 Opportunities

- **Facilitated Housing Development—Residential Zoning:** The TOA is nearly covered in various residential zones. The TOA has a high capacity to facilitate housing development.
- **Compact Urban Growth—Developing Mixed-Use Nodes:** While the prevalence of single-family homes and small lots may inhibit development in some aspects, the generally low land use intensity also makes redevelopment easier and cheaper. This provides an opportunity to create new commercial centres, mixed-use spaces, and conducive amenities such as pedestrian facilities and parks.

Key Insights & Next Steps



Summary of Findings

The table presents our Phase 1 findings in the Themes column, with an “x” in the subsequent columns indicating resonance with that TOA station.



Themes	Edmonds, Burnaby	Moody Centre, Port Moody	Hillcrest-184 Street, Surrey
Improved Needs Assessment	x	x	x
Compact Urban Growth	x	x	x
Capacity to Address Housing Need	x	x	x
Capacity of Municipal Staff	x	x	x
Missing Local Contexts	x	x	x
Facilitated Housing Development	x	x	
Ability to Accommodate Growth		x	x
Neighbourhood Character		x	x
Energy & Emissions Efficiency			
Environmental Harms of Densification		x	
Topographical Concerns around TOAs		x	x
Jurisdictional Overreach		x	
Protections for Low-Income & Vulnerable Populations	x		

Summary of Phase 2 Findings

Many impacts of the housing mandates have yet to be fully realized

The housing mandates were introduced in November 2023. BC municipalities were required to implement SSMUH and TOAs by June 30, 2024, with zoning bylaws and OCP updates required by December 31, 2025.

One finding from Phase 1 was that the housing mandates enable and encourage more housing development. Uncertainty about the legislation's impact on development has paused many development plans in the immediate term. Although many interest holders indicated that developments will resume after this uncertainty, it is unclear when we will see changes to the built environment or development accelerated.

Strained municipal staff capacity was a common concern in our Phase 1 findings, with many Metro Vancouver municipalities highlighting the pressure to update policies and meet provincial deadlines. With limited capacity, new mandated tasks and existing uncertainties, it is likely that new questions, concerns, and uncertainties will emerge as the mandates are implemented, new tools are adopted, and development progresses. Therefore, as the housing mandates are still in their early stages, the impacts have yet to be fully realized. The housing mandates disrupted local planning for all Metro Vancouver municipalities.

The impacts of Bill 47 on development depend on a variety of factors

We sought to uncover the characteristics that challenge or optimize the implementation of the housing mandates and ultimately accelerate development within TOAs. Each TOA is a distinct combination of factors producing unique outcomes. This report points to many determining qualities, including the municipal political climate, regional market conditions, the age of housing stock, housing tenure, land availability, and municipal bylaws and policies.

Ultimately, the ability to accelerate housing development while ensuring project viability goes beyond the timelines implicit in the housing mandates and is subject to the combination of factors within TOAs.

TOD planning in Metro Vancouver preceded the housing mandates

The policy review and qualitative interest-holder interviews show that many municipalities have already been planning for TOD. All three studied municipalities incorporated TOD planning principles into their OCPs and supporting plans to varying degrees. While some aspects of provincial and municipal TOD align, the extent to which the provincial TOA legislation conflicts and interferes with local planning efforts is yet to be fully explored. However, some municipalities, such as Burnaby, may be less significantly impacted because of existing TOD planning efforts and because zoning in some TOAs already exceeds the density and height ordered in Bill 47.

The housing mandates necessitate municipal needs assessments

As the housing mandates have enabled greater housing supply, densities, and population, there is a need for municipalities to update their needs assessments to respond to, and plan for anticipated growth and adequately meet the increased demand for infrastructure, services, amenities, and facilities. Updating needs assessments as soon as possible will also allow municipalities to update plans, budgets, and timelines.

TOA Concentric Approach

Another point we heard from both phases was uncertainty and ambivalence toward the concentric TOA design mandated by Bill 47. The Provincial TOAs prescribe geometries and volumes that emphasize the shape of development, in a concentric model. The mandates could be amended to more explicitly reach housing targets. Currently, they focus on prescribing heights and densities in specific areas, but they could go further by also directly addressing factors like affordability, design, and built form— that could assist in reaching liveability goals.

Applying the standard concentric TOAs, disregards local factors, such as topography, environmental barriers, and diverse land uses. For instance, a large part of Moody Centre Station TOA encompasses open water to the north and steep hillside terrain to the south. Many Metro Vancouver TOAs, including Moody Centre Station, also transcend municipal boundaries causing jurisdictional issues. Ultimately, interest holders questioned whether the rigid concentric shape would effectively deliver on the housing mandate goals.

Unrealized Impacts of ACCs

The actual efficacy of ACCs has yet to fully materialize. Burnaby, at the time of writing, is the only municipality that has adopted a new ACC bylaw. Our interviews and media scan identified that local planners have not widely identified ACCs as a key opportunity for financing community amenities or streamlining negotiations, despite their intended role in replacing CACs.

The Province, in a best-practice guide, encouraged municipalities to adopt the new ACC bylaw as soon as possible to capture the land uplift prescribed in Bill 47. Port Moody and Surrey are currently reviewing their CAC policies and drafting ACC bylaws. However, both cities have been relying on a fixed-rate CAC system, meaning the potential benefit of ACCs in expediting negotiations may be limited. Given the novelty of ACCs, their effectiveness in accelerating approvals and ensuring more predictable funding for amenities will need to be closely monitored. New ACC bylaws must also be tracked to ensure they support municipal growth without negative externalities for affordability and project viability.

Phase 2 findings have built upon Phase 1 findings. For the full description of Phase 1 findings, [see Appendix 3](#).

Recommendations

Recommendations to the Province

Continue to amend legislation, clarify uncertainties and create 'best practices guides' to implement housing mandates effectively

The novelty of the housing mandates—including minimal legal precedent—produced many questions about the details and application of the legislation.

- **Increased clarity around financial mechanisms is necessary to understand how municipalities are expected to support growth.** As of March 2025, the Province published the [Amenity Cost Charge Best Practices Guide](#) to promote the standardized development of ACC bylaws while allowing flexibility for local governments to tailor them to their specific contexts. This document may have provided more clarity on the purpose of the ACC bylaw, but concerns may remain about mechanics.
- **The Province must provide clarity and financial support programs for infrastructure funding.** There is significant concern over the provision of amenities and infrastructure to support the as-of-right density provided by the Province. The Province has suggested how these gaps will be funded, through the expansion of eligible services funded by DCC in Bill 16 and the quick development of an ACC to capture funding in projects that are encouraged under Bills 44 and 47. Municipal infrastructure is funded by the already-strained municipal budget, which will need necessary upgrades and additions to maintain efficiency.
- **Provide clarity on how provincial housing mandates interact with municipal policy and other policy areas.** Higher-density developments can sometimes conflict with other municipal objectives, particularly those related to livability. Questions remain about when housing mandates take legal precedence over municipal policies. For example, local goals related to tree canopy preservation and broader environmental policies may be constrained by the requirements of these mandates.
- **Explore the feasibility of inclusionary zoning across all TOAs.** The housing mandates operationalize more financial tools that municipalities can employ in housing development. Municipalities must learn how to balance collecting DCCs and ACCs and perhaps bonus density and inclusionary zoning to ensure project feasibility and facilitate development. Employing mechanisms—including inclusionary zoning—in a way that makes development non-viable will hinder the housing mandates' goals. However, without mandating affordable units provincially or municipally, these units will fail to be built, and TOAs will become less accessible for low to moderate-income households who depend on public transportation.

Recommendations to the Province

Allow flexibility within the concentric TOA approach

In our media scan and early interviews with planners and other professionals, the blanket approach was often noted as a trending topic of discussion because of the complexity of applying broad, province-wide practices to varying local contexts with different municipal bylaws. Although the 800m concentric TOA model can be efficient in some locations, the rigidity of the mandated TOAs disregards local context and may fail to produce the desired effect—of increased, denser residential development—around all transit hubs. Moody Centre TOA exemplifies this complexity with minimal residential zoning, a diverse land use mix that includes industrial areas, waterfront and park space, steep grades, and disconnected neighbourhoods spanning multiple municipalities.

Bill 47 could be amended to allow greater flexibility, enabling municipalities to more effectively achieve the intended objectives of the housing mandates. The current Euclidian distance measures the shortest, straight-line distance and fails to account for the quality of connectivity. To be most effective in the local context, the Province could work with municipalities to effectively adapt their TOAs using Manhattan distance —measuring connectivity using the grid paths—using distance or walking time. These considerations would be important in encouraging the use of public and active transportation. This adaptation would be relevant in Edmonds, Moody Centre and Hillcrest-184 Street Stations, where physical impediments, including steep grades, creeks and large industrial parcels of land restrict accessibility. This can be executed by designating a minimum land area, number of residential properties or FAR within a certain distance of the SkyTrain stations or even transit corridors.

With only 64 SkyTrain TOAs, the Province could efficiently collaborate with these nine municipalities to adjust the approach to meet local needs, while still encouraging strategic housing development.

Recommendations to Municipalities

Invest in infrastructure frameworks that can support the projected growth and development

- **Invest in active transportation infrastructure to shape complete communities.** Removing parking requirements within TOA presents an opportunity to reduce car dependency and encourage more sustainable, people-centred urban environments. However, for this shift to be successful, municipalities should prioritize investments in active transportation infrastructure to ensure walking, cycling and other non-motorized modes are safe, convenient, and accessible. From our site visits, we observed significant room for improvement in walkability and active transportation—both essential for creating complete communities.
- **Undertake re-assessments of housing reports, infrastructure, and services capacity.** The housing mandates have the potential to significantly amplify community infrastructure and service needs. Municipalities must track and monitor growth to ensure infrastructure and service capacity meets the need.
- **Create a plan for the acquisition of land for amenities, services, and facilities.** The increasing population within the TOA circles increases the pressure to provide for amenities and services. This means that dedicating land for future amenities, services, and facilities becomes imperative to ensuring a high quality of life for future and current residents.

Strengthen the rental market in TOAs

- **Strengthen rental unit protection policies and bylaws.** All three studied municipalities have rental policies restricting the conversion of purpose-built rentals to strata and policies that either encourage or demand the replacement of purpose-built rental units in building redevelopment. These often include a 1:1 replacement of rental units in new developments. Despite these policies in place, Metro Vancouver reports that from 2011-2022, Burnaby experienced a 9.9% net loss of purpose-built rentals, while Port Moody experienced a 107.7% growth and Surrey 9.2% growth [36]. However, all three municipalities' policies do not cover secondary market rental units. 64% of Metro Vancouver's renters participate in the secondary market. In the face of increasingly precarious but optimistic development conditions in TOAs, municipalities must prevent the net loss of rental units in the primary and secondary markets so that renters are not priced out of transit-accessible areas.
- **Strengthen tenant protection bylaws to limit renter displacement.** Municipalities must ensure that tenants do not face an exacerbated risk of displacement due to Bill 47 by adopting a tenant protection bylaw with regular updates to meet the needs of their residents. All three studied municipalities have implemented tenant protection bylaws.
- **Support the development of affordable rental housing units within TOAs.** TOD enhances accessibility to public transportation for those who rely on public transit as a primary mode of travel. Securing affordable rental units must be prioritized in TOAs to ensure those who need access to public transportation can live in the area and capitalize on improved transit and access to services. Developing an Inclusionary zoning bylaw—encouraged by Bill 16—aims to spur the development of below-market, affordable housing, and is a critical aspect of affordability in TOAs.

Recommendations to Municipalities

Explore greater integration of mixed-use zoning to ensure complete communities

To fully realize the housing mandates' goal of increasing housing supply, municipalities must expand mixed-used zoning within TOAs. Our analysis of Moody Centre Station highlights how zoning restrictions can limit housing potential. Despite a diverse land use mix, the station area has relatively little land zoned for residential development, resulting in the lowest projected housing yield among our studies TOAs. Expanding mixed-use zoning would allow housing alongside commercial and industrial uses, creating vibrant, walkable communities where homes are well-integrated with jobs, services, and transit.

Recommendations for Future Research

Identify policy areas that conflict with housing mandates to adjust regulatory frameworks to complementary housing mandates

A valuable area for further research is identifying existing policy areas—such as environmental regulations or local land use bylaws—that may conflict with the goals of the housing mandates. Understanding these tensions can help inform adjustments to regulatory frameworks, ensuring they align more effectively with the mandates and support streamlined housing delivery. It will also identify if amendments are required to complement or mitigate the impacts of the housing mandates.

Explore the best-practice knowledge-sharing

- **Create a database or framework for intergovernmental collaboration and knowledge sharing, and monitor progress.** The enormity of changes brought by the legislation has left planners and stakeholders with a myriad of questions and concerns. While the Province has provided some answers, it is unclear if it is looking to municipalities to champion the first steps. Knowledge-sharing is critical in the early months to accelerate bylaw updates, approval processes and development timelines to create predictability and stability in the housing market. Many TOAs span multiple jurisdictions, making strong coordination between municipal governments necessary to achieve a balanced distribution of housing and amenities. To facilitate coordinated planning for these TOAs, municipalities could collaborate on secondary plans, aligning zoning and infrastructure development to promote coordinated growth.
- **Develop a regional housing forum.** A forum would allow municipalities with more experience in TOD and funding community amenities and infrastructure to share best practices with smaller municipalities. By fostering knowledge exchange and collaboration, municipalities can collectively address challenges, streamline planning efforts, and enhance the overall success of TOA development.

“We’ve got 21 local governments responding to the same mandates differently. There’s an opportunity for them to collaborate and create coordinated plans”
- Municipal Planner in Metro Vancouver

Team Profile



Aaron Li

Aaron graduated with a Bachelor's of Human Geography from UBC and is currently pursuing his master in community and regional planning with a passion for creating transit-oriented and complete communities through policy. Aaron hopes to leverage his experience at Infrastructure Canada as a policy analyst assisting in national housing funding programs to successfully synthesize several streams of information and identify key challenges facing Bill 47 implementation.



Jackson Spring

Jackson first developed a passion for land use and housing while working as a journalist, reporting on ongoing issues of gentrification, development, and urban renewal in the impoverished neighbourhood of Boyle Street in Edmonton, Alberta. Combining this background with ongoing studies in Community and Regional Planning at UBC, Jackson has developed a specialty for context-specific planning that addresses housing affordability, security, and tenants' rights.



Megan Parno

Megan is passionate about creating equitable and people-centred complete communities. After an internship with the Emergency Planning Secretariat, she hopes to bring her environmental expertise to the housing sector and explore opportunities for affordable and sustainable housing solutions in Metro Vancouver. Megan holds a Bachelor of Arts—Honours Specialization in International Relations from the University of Western Ontario.



Michelle Yeung

Michelle is an appraiser trained in Hong Kong. With her background in property development, she is passionate about affordable and low-income housing, as well as designing inclusive public spaces. She holds a Bachelor's degree in Urban Studies and currently works as a Research Assistant at SCARP, focusing on the preservation of Single Room Occupancies in Vancouver's Downtown Eastside.

Appendix 1: Media Scan of Studied Municipalities



TOA Media Scan

Burnaby

"In my mind, Brentwood and a couple of other areas in our city have done more than enough,"
- Mayor Mike Hurley

While the City of Burnaby has long supported transit-oriented growth, the mayor criticized the housing mandates, particularly Bill 47, as a legislative overreach, arguing that the province's blanket approach fails to account for local planning efforts and could lead to overdensity in well-developed areas like Brentwood. In response, community groups such as "Save Brentwood" have mobilized, exploring private covenants as a potential legal tool to resist further densification. Uncertainty remains over how Burnaby will balance the mandated density increases with infrastructure capacity and amenity provision. [37] [40] [46].

Port Moody

The City of Port Moody has expressed concerns about the housing mandates over a loss of local authority and disruption to local planning efforts, including the elimination of public hearings. In the small municipality, the two SkyTrain TOAs dominate the core of the city's land area, creating challenges for service and infrastructure capacity. With serious topographical and waterway conditions, the applicability of the concentric circle of the TOA is questioned. Lack of clarity around legislative details and requirements, land use changes and the legal interaction with municipal policies have been emphasized. [40] [41] [42] [43].

"To be clear, the province has removed much of our authority as it pertains to how we densify...I'm not sure that I have a great deal of confidence going forward that those have been really carefully thought through"
- Mayor Meghan Lahti

Surrey

"Aside from hindering a city's ability to plan for livable communities, I am very concerned how these unilateral measures will change communities forever."
- Mayor Brenda Locke

The City of Surrey has responded hesitantly to the provincial housing mandates, particularly Bill 47, expressing a primary concern about the loss of local planning authority, while tight provincial deadlines, private covenants, and the limited capacity of existing infrastructure to accommodate rapid growth are also issues. Despite the City experiencing the greatest population growth in the region over the last decade and engaging in TOD planning practices, the pace and scale of change have created friction. Public engagement for the Hillcrest TOA has revealed cautious optimism and resistance to transforming the historically suburban area into a high-density TOA. Community feedback on the Hillcrest-184 TOA planning area highlights ongoing uncertainty around the impacts on affordability, livability, and local character. [39] [40] [44].

Appendix 2: Methodology



1.1. Census Data Analysis

A wide range of variables measured in Canada’s 2021 Census of Population were used in this report. In addition, data was at times manipulated and aggregated in order to calculate medians, means, weighted averages, proportions, sums, percentages, and other important figures. The geographic areas used are Census Metropolitan Areas, Census Subdivisions, and Dissemination Areas. All census information was sourced from Statistics Canada.

List of variables used	Table no.
• Population	98-10-0015-01
• Private dwellings occupied by usual residents	98-10-0015-01
• Population density per square kilometre	98-10-0015-01
• Private households by tenure	98-10-0259-01
• Occupied private dwellings by period of construction	98-10-0233-01
• Occupied private dwellings by structural type of dwelling	98-10-0040-01
• Household income statistics	98-10-0068-01
• Households spending 30% or more of income on shelter costs	98-10-0259-01
• Households in core housing need	98-10-0259-01
• Monthly shelter costs by tenure	98-10-0253-01
• Value (owner-estimated) of dwellings	98-10-0256-01

1.2. Site Visits

We conducted site visits to the three sample TOAs with one central objective:

- Earn an experiential understanding of the transportation and pedestrian infrastructure, neighbourhood character, mix of land uses and structural types, and other sensory factors, in order to supplement our other sources of data.

Data from site visits was collected in the form of field notes, and reference photographs to serve as examples and illustrations of concepts analyzed in the report. A mapped collection of these photographs can be viewed by following this [link](#).

1.3. Dasymetric Weighting

In order to gain a more accurate picture of the population density than census data allowed, we converted the census maps into raster maps, and applied weights to raster cells according to their land cover. The following steps were used in this process:

1. Land cover codes were assigned to eight categories of broad land use categories and structure types of residential buildings.
2. Relative density (Ra) was calculated for each land cover code, using a synthesis of Ra calculations previously conducted by the University of Portland and the University of British Columbia, and Neptis Institute (Table 1).
3. Ra values were converted into cell weights by first calculating each Ra's deviation from the mean Ra. This was converted into a percentage value, and these percentages were added to or subtracted from 100%, representing the original density value of each cell identified by the census data (Table 2).

Table 1:

Land Cover Code	Description	Dwelling Unit-Acres (DUA)	Relative Density (Ra)	Mean Ra
1	Single-detached residential	11	5.9	14.3
2	Semi-detached, attached residential	28	13.1	
3	Residential, mixed-use under five storeys	61	26.9	
4	Residential, mixed-use with five or more storeys	114	49.1	
5	Commercial, industrial, or institutional	4.7	2.5	
6	Natural, agricultural	4.7	2.5	
7	Water, wetland	0	0	

Table 2:

Land Cover Code	Description	Relative Density (Ra)	Deviation from Mean	Raster Cell Weight
1	Single-detached residential	5.9	-8.4 (-58.7%)	41.3%
2	Semi-detached, attached residential	13.1	-1.2 (-8.4%)	91.6%
3	Residential, mixed-use under five storeys	26.9	12.6 (+88.1%)	188.1%
4	Residential, mixed-use with five or more storeys	49.1	34.8 (+243.4%)	343.4%
5	Commercial, industrial, or institutional	2.5	-11.8 (-82.5%)	17.5%
6	Natural, agricultural	2.5	-11.8 (-82.5%)	17.5%
7	Water, wetland	0	-14.3 (-100%)	0.0%

1.4. Unit Potential Estimate

We wanted to estimate how many new housing units would be added if parcels implicated by the TOAs' tiered boundaries were developed up to the FAR thresholds outlined in Bill 47. The following assumptions and steps were used in this process:

Assumptions:

- Building efficiency: 83%.
 - A measure of the actual usable residential space within a typical building, excluding circulation space and utilities.
 - Estimated figure of 83% was provided by MODUS.
- Average unit size [table 1]:
 - Surrey: 64.1 m²
 - Burnaby: 75.3 m²
 - Port Moody: 90.1 m²
 - Figures represent the average size of ownership units in multifamily buildings constructed after 2016, according to the Canadian Housing Statistics Program. Sizes for rental units are not available. The time frame was chosen to reflect recent construction trends as best as possible.
- The number of existing units was calculated using a combination of municipal open data regarding the building type per parcel, and real estate listing data showing number of units in multifamily buildings.

Steps:

1. Parcels which overlapped with the TOA boundaries were isolated, and the total area of these parcels was calculated using QGIS.
2. Gross Floor Area was calculated by multiplying the parcel area by the FAR allowed in the respective TOA tier.
3. Net Residential Area was calculated by multiplying the Gross Floor Area by building efficiency (83%).
4. Approximate Unit Potential was calculated by dividing the Net Residential Area by the average unit size for each respective City.

Table 1:

City	TOA Tier	Total Parcel Area	Gross Floor Area	Net Residential Area	Approximate Unit Potential	Existing Units	Unit Gain	Percentage Unit Gain
Port Moody	200m	71,531	357,655	296,854	3,295	12	3,283	27355.94%
	400m	283,365	1,133,460	940,772	10,441	1,300	9,141	703.19%
	800m	647,667	1,943,001	1,612,691	17,899	1,174	16,725	1424.61%
	Total	1,002,563	3,434,116	2,850,316	31,635	2486	29,149	1172.53%
Burnaby	200m	130,787	653,935	542,766	7,208	1,220	5,988	490.82%
	400m	328,122	1,312,488	1,089,365	14,467	1,724	12,743	739.15%
	800m	776,718	2,330,154	1,934,028	25,684	4,206	21,478	510.66%
	Total	1,235,627	4,296,577	3,566,159	47,359	7,150	40,209	562.37%
Surrey	200m	132,914	664,570	551,593	8605	171	8434	4932.28%
	400m	347,932	1,391,728	1,155,134	18021	523	17498	3345.66%
	800m	1,150,271	3,450,813	2,864,175	44683	1,485	43198	2908.95%
	Total	1,631,117	5,507,111	4,570,902	71309	2179	69130	3172.55%
Grand Total		3,869,307	13,237,804	10,987,377	150,303	11815	138,488	1172.14%

Appendix 3: Thematic Interview Findings



Emerging Themes

High Impact within TOAs

A common theme found across almost all interviews was that the most immediate and the largest impacts on the development landscape will likely be felt within TOAs. This is for a few reasons:

- Much of the legislation governing TOAs took effect immediately, even implicating in-stream developments.
- The removal of parking requirements within TOAs is a particularly impactful aspect. While developers are still allowed to include as much parking as they wish, our interviewees believed near-universally that less parking would be built on average. In addition, we heard anecdotes of development applications already being submitted with either no parking or dramatically less parking than would have been required otherwise.
- Private developers are highly concerned with density when assessing the financial viability of projects, and the TOAs allow for higher densities by default than other urban areas.

Cautious Optimism in the Public Sector

At large, public-sector planners across specialties have positive opinions toward both the intent and predicted effects of the housing mandates. The general belief is that the mandates present a possible path to better housing outcomes—mainly by alleviating high housing costs and supporting complete communities. Public-sector interviewees also indicated that the mandates were largely conducive to other important municipal objectives, especially related to mobility and the environment.

The reservations among public-sector planners include the complete reliance on the private sector to deliver the desired housing outcomes, which leaves uncertainties as to whether the housing will actually be delivered, and whether it will be delivered in a way that meets all the needs of the community. In particular, interviewees questioned whether the mandates would enable below-market housing.





Enthusiasm Among Developers

The developers and development experts we interviewed generally have positive views on the housing mandates, especially Bill 47. Developers appear confident about the capacity of the private sector to deliver the density prescribed for the TOAs. The removal of parking requirements and increased allowable density can increase the financial viability of housing projects considerably. Both the public-sector and private-sector interviewees praised the streamlining development process. It is the opinion of numerous interviewees that Bill 46 will bring necessary predictability, reliability, transparency, and coordination to development finance and project planning across Metro Vancouver.

High Volumes of Changes with Tight Deadlines

A recurring theme shared by both our private and public sector interviewees is the profound impact of the new legislation on work processes. The scope of this impact varies, from shifts in team priorities to the complete overhaul of projects, or the realignment of ongoing work to meet the legislative requirements. Interestingly, many interviewees expressed a shared perspective, viewing the current high volume of changes as part of an adjustment phase that all organizations are undergoing. They are optimistic that once municipalities and organizations have fully adapted, workloads will return to a more sustainable and manageable level.

Uncertainty about Long-Term Impacts

While many interviewees were able to say with confidence the expected impacts of the housing mandates, there was nonetheless an acknowledgement that a degree of uncertainty exists about the unfolding impacts of the new legislation. As the housing mandates were introduced in November of 2023, the full impacts have yet to be unfolded. Hence, there is still much uncertainty over the realization of the impacts.

In particular, interviewees broadly struggled to answer questions regarding the functioning of ACCs/DCCs, and the financing of amenities and infrastructure more broadly under the framework provided by Bill 46. The precise ways these financing mechanisms function, as well as their net effects on the development landscape, were said to likely not be evident for the first few years after the introduction of the housing mandates. In addition, while interviewees were more confident to predict the impacts on housing affordability within TOAs, they acknowledged that other macroeconomic conditions and policies affect housing costs in substantial ways, independent of the mandates. For example, a major factor in developers' capacity to build is the price of construction materials and labour, and a major factor in home prices is interest rates, and the mandates are unable to account for these confounding variables.

Key Opportunities

Facilitated Housing Development

"These mandates are going to hopefully lubricate the squeaky wheel of approvals processes municipally, and lead to much more housing over the long run."

One of the main intents of the Provincial housing mandates was to make housing development simpler, easier, and more affordable to build. While questions remained as to whether this intent would be realized, our findings so far reveal a high confidence that the housing mandates will facilitate housing development within TOAs.

Financial Viability

Parking Requirements

Right Supply

Development Timelines

Built Form

Public Hearings

Bylaw & Policy Updates

Blanket increases in FAR and building height allowances within TOAs will increase the financial viability of residential development at large, by enabling more units per project. In addition, the removal of parking requirements was said to be a major factor, as it both reduces costs associated with building and maintaining parking structures, and also increasing the amount of space that can be dedicated to revenue-generating uses. A secondary benefit of both the increased density allowances and the removal of parking requirements is that it allows for more flexibility in floor plans and building design, enabling projects to achieve even greater densities of units in some cases, and including higher numbers of much-needed 2 and 3-bedroom apartments in others.

The process of municipal approval for projects will in many ways be faster and smoother, especially for projects within TOAs. For example, a legal expert elaborated that design requirements are not enforceable if they functionally prevent developments from securing the minimum allowable densities, reducing the burden on developers and preventing delays associated with design revisions. This factor also adds to the aforementioned flexibility in building design, as developers are less subject to specific regulations governing the form of buildings.

Both private sector and public sector interviewees were broadly in favour of the prohibition of public hearings for developments that are consistent with the municipality's OCP within Bill 44. Developers will benefit from reduced approval timelines and avoid delays associated with needing to re-apply, while public-sector staff will be less burdened with work associated with public hearings, allowing more developments to make it through the approvals processes, quicker. Public-sector planners were largely unconcerned with what could be perceived as taking away important public engagement, stating that engagement can, and should, be frontloaded during the creation and updating of OCPs.

Affordability

Housing Supply Increases

Housing Security

While the overall question as to how the housing mandates will impact housing affordability, many of our interviewees reinforced that facilitating development is likely to put downward pressure on housing costs. Public sector planners indicated that the resulting increases in housing supply will at least alleviate the persistent trend of rising housing costs. In addition, the increased supply will put less pressure on landlords to evict tenants, and will make evictions less likely to result in the evicted household becoming chronically houseless.

Economy of Scale

While the downward pressure from increased supply is often offset by land value increases, private sector developers mentioned that the increased density allowances allow them to operate economies of scale that will better offset the costs of land. Essentially, the cost to develop is spread over a larger number of units, reducing the amount of rent that is required per unit to recoup those costs.

Improved Needs Assessment

“Many cities don’t have in-depth projections of what infrastructure upgrades are needed in specific areas. This is a massive opportunity to better plan for infrastructure and community amenities”

Bylaw & Policy Updates

Pro-Active Planning

Affordability

OCPs

Right Supply

The next major deadline for municipalities, set by the mandates, is to submit an interim HNR by January 1, 2025. These HNRs will assess current housing inventories and needs. While we heard criticism that the Province’s suggested HNR methodology does not capture the full picture of housing need, there was broad consensus that the requirement of standardized reports will enable proactive planning. This system will provide a better picture of how much housing needs to be built, what types of housing are most needed, and where the supply is in most demand. In addition, one interviewee indicated the new HNRs would enable municipalities to undertake more suitable and targeted housing interventions to address affordability in critical areas. Additionally, the requirement for municipalities to update OCPs and zoning bylaws in accordance with HNR findings will ensure municipalities provide diverse housing options.

Besides housing, we heard from other interviewees about ways municipalities are or need to be, assessing other important community needs in response to the mandates. For example, one public-sector interviewee mentioned an ongoing project to conduct a comprehensive “social infrastructure needs assessment.” The assessment evaluates the inventory and spatial arrangement of the municipality’s social services and amenities, including childcare facilities and mental health clinics. Being aware of the capacity of social infrastructure in different areas would allow municipalities to apportion new services and amenities in more efficient ways.

Similarly, another interviewee highlighted collaboration within municipal departments to align priorities and overcome financing challenges. We heard recommendations for municipalities to conduct similar needs assessments for physical infrastructure, public spaces, parks, and environmental assets. By integrating comprehensive needs assessments, municipalities can seize this as an opportunity to proactively plan for growth and ensure services and amenities are equitably distributed and meeting evolving needs amidst densification.

Infrastructure Capacity

Amenity Provision

Infrastructure Capacity

Environmental Protection

Public Open Space

Compact Urban Form

Greater residential density around transit stations will minimize the amount of land required for people to live and commute. Several interviewees detailed the fiscal and social benefits this can have for municipalities, as infrastructure costs are lowered, and distances between homes and amenities are reduced, allowing residents to attend to their daily needs without having to rely on cost-prohibitive and time-intensive transportation.

The relaxation of FSR, building height, and parking requirements within TOAs is expected to make the areas much more compact as development increases. Transportation experts detailed how this aspect of Transit-Oriented Development not only supports a mode shift toward mass transit but the internal walkability of the community as well.

Furthermore, the potential land use efficiency within the TOAs may make it easier to provide amenities including public green spaces, contrary to some prevailing narratives. This is because densification within TOAs would not only provide more homes per unit of land but would increase the overall amount of land that can be apportioned to non-residential uses such as amenities or open space, while still addressing housing needs.

Land use efficiency

Financial Capacity

Parking Requirements

Walkability

Public Open Space

Housing Supply Increases

Energy & Emissions Efficiency

“More efficient mass transit with a lower carbon footprint and creating spaces for walking, cycling, and rolling will allow people to stay local and reduce their carbon impact.”

Environmental Protection

Carbon Footprint

Land Use Efficiency

Walkability

Parking Requirements

Urban Tree Canopy

Built Form

Increasing residential density around transit stations significantly reduces commuting distances. This has immense environmental benefits, as it reduces the need for housing to encroach on local ecosystems. In addition, it decreases the overall energy use of the urban environment, as transportation trips are reduced, and utilities are generally more efficient to administer.

As we heard from environmental experts, the most effective method for reducing transportation-related emissions is not lowering trip times nor shifting towards more efficient modes, but reducing the number of trips taken per capita. Conceptually, densification within TOAs supports this objective by ensuring residents have access to important services and amenities within walking distance. However, some questions remain as to whether municipalities will have the tools to incentivize or mandate the non-residential development needed to create walkable neighbourhoods.

One of the experts highlighted the potential environmental benefit of eliminating minimum parking requirements for residential uses in TOAs. This could reduce the need for underground parking and minimize parking coverage, which is crucial for tree growth and maintaining the urban tree canopy amidst densification. Yet, since market demand often dictates parking provisions, residential projects may still include parkade slabs to remain marketable, raising concerns about the long-term viability of green spaces above these slabs.

Additionally, advancements in green building technologies offer ways to mitigate some negative effects of density, such as the urban heat island effect, through features like green roofs. Nonetheless, technical challenges persist, particularly with incorporating these features on wood-frame buildings, creating uncertainty around the provision of vertical green spaces.



Key Challenges

Capacity to Address Housing Need

"Inclusionary zoning and density bonusing: these are great tools. However, they constrain the way municipalities are able to secure non-market or affordable housing."

Housing Supply Increases

Right Supply

Inclusionary Zoning

Affordability

Operational Capacity

Housing Supply Increases

Blanket Approach

Housing Security

Bylaw & Policy Updates

Staff Capacity

Right Supply

Housing Security

Land use Efficiency

Financial Capacity

Complete Communities

While interviewees were broadly confident that the housing mandates would lead to increased development within TOAs, adding more housing to the overall supply addresses only a fraction of housing need. As mentioned in the **Key Concepts**, there is also a specific need for below-market housing to address the needs of low-income households.

The mandates include measures to help municipalities secure affordable housing, such as inclusionary zoning and density bonusing frameworks in Bill 16. However, development experts in both the public and private sectors were uncertain of the net effects on affordable housing provision. Generally, private-sector interviewees made more positive predictions, in particular toward the density bonusing changes. The new framework requires municipalities to outline specific criteria in density bonusing bylaws, including how many affordable units would be required and the degree of affordability required. Private-sector interviewees mentioned this added predictability would net more affordable units within TOAs since developers will have more confidence in proposing denser projects without the uncertainty of what stipulations will be added by municipalities. More broadly, the expediency benefits of the mandates were predicted to have a greater net effect on affordability by simply adding more units than negotiation-based affordable housing provisions.

Public-sector interviewees were more cautious, saying the frameworks would still secure significant affordable housing but reduced the flexibility to respond to locally specific and often changing needs. An example given is if changing economic conditions caused housing affordability to worsen, municipalities will now need to amend the density bonusing bylaw to escalate the number of affordable units being built, as opposed to negotiating for more units on a per-project basis. In addition, the requirements to pre-zone and conduct financial feasibility assessments to use the inclusionary zoning tools is a time-consuming process that may hinder or delay non-market development.

Public-sector interviewees also questioned whether other aspects of housing need could be addressed by the mandates. The **Key Concepts** discusses the specific needs of diverse households, including larger or multi-generational families who require more bedrooms and populations who are more likely to be housing insecure. Both public and private-sector planners agreed that the mandates currently do not contain methods of specifically assisting these segments of the population.

However, interviewees also broadly agreed that the mandates can potentially provide several paths to addressing housing need. In the long term, the resulting land use efficiency would provide municipalities with more room to provide non-market housing and other supportive structures such as shelters; increases in market housing reduce the amount of public funding required to address other segments of housing need, and denser communities would alleviate other aspects of unaffordability such as transit costs, as essential services would be accessible at shorter distances.

Missing Local Contexts

Blanket Approach

Criticisms about the nature of the housing mandates applying universally without regard for exceptional local needs, existing policies, or demographics were consistent between our media scan and interviews.

Bylaw & Policy Updates

One concern from public-sector planners is that municipalities may have pre-existing policies and practices they trust to address housing needs, that may need to be replaced or modified, including HNR methodologies, tenant protections, rent controls, and density bonusing schemes. Some of these concerns were speculative: it is uncertain as to how existing tenant protection bylaws are implicated by the mandates, for example. The uncertainty is causing hesitancy among planners, and is sometimes a barrier to completing the plans and policies required by the mandates, such as OCPs, since confusion persists as to what can and cannot be included or enforced.

Tenant Protection

Interpreting Legislation

OCPs

Right Supply

Incentives

The larger concern, however, is to do with differences in neighbourhoods and areas implicated by the TOAs that are unaccounted for. We heard a large contrast in how different TOAs would be affected by Bill 47: some were well-suited for development to the point they were already densifying to approximately the same degree prescribed by the legislation, while others faced particular risks or barriers to increased development, or had a particular need for types of housing that private developers often do not have strong incentives to build, such as below-market rentals, or larger units for families.

Infrastructure Capacity

Complete Communities

Another difference between TOAs is the capacity of the existing infrastructure and amenities. Some areas may already have deficits of schools or parks, for example, exacerbating more general concerns about municipalities' ability to accommodate the projected population growth within TOAs resulting from increased housing development (discussed further on Page 22).

Protections for Low-Income & Vulnerable Populations

A common short-term concern, independent of any long-term impacts the housing mandates may have on housing affordability and accessibility, is the displacement of existing residents during development.

Interviewees indicated this is a particular issue concerning TOAs, for several reasons. Firstly, some pointed out that many currently existing transit-oriented neighbourhoods have relatively high proportions of low-income renters, who rely heavily on public transit. These populations are especially housing insecure, and would have the most difficulty finding affordable replacement accommodations. Secondly, the rate of displacement naturally increases with more development, and since the TOAs are predicted to see the quickest and shortest-term impacts, municipalities are more likely to see high rates of displacement in those areas, and have little time to react.

Bill 16 provides allowances and guidance for municipalities to enact a Tenant Protection Bylaw, but some interviewees said the new rules do not strengthen existing local tenant protections, and are in some cases weaken them. Furthermore, the Province has not provided guidance on how existing tenant protections will fit with the new rules, or whether they are even enforceable.

Housing Security

Housing Tenure

Affordability

Housing Supply Increases

Tenant Protection

Interpreting Legislation

Ability to Accommodate Growth

“A major issue with this TOA legislation is that it risks requiring mega upgrades to storm sewer systems everywhere within certain radii. This becomes problematic when cities lack plans, as they struggle to address developments popping up in various locations.”

Many interviewees raised concerns about the capacity of existing infrastructure to accommodate for rapid growth. Concerns include the capacity of water, sewage and storm-water systems and roads, as well as the adequacy of public amenities like parks, schools, and childcare facilities, that already fail to keep pace with residential development. Many interviewees expressed concern about the capacity of current transit systems to accommodate the prescribed growth in TOAs. They frequently emphasized the importance of collaboration between municipalities, the Province, and TransLink to ensure that transit systems and facilities can adequately support development within these areas. Aligning infrastructure needs with population growth is critical to maintaining livability, but municipalities frequently encounter delays due to funding and planning constraints.

The introduction and regulation of ACCs and DCCs provide a mechanism for predictable funding, but uncertainty remains about their effectiveness and flexibility. Unlike CACs, municipalities can only utilize the funds collected through ACCs on amenities within the area that are directly impacted by the development. This means that funds collected from a development cannot be used to provide amenities in neighbouring communities, even if upgrades or new amenities are necessary. This limitation will likely exacerbate spatial inequalities and leave some neighbourhoods under-served by concentrating investment in certain areas. Additionally, some public-sector planners expressed concerns that rising land values might make it more challenging for municipalities to purchase land to build new schools and hospitals. This issue is particularly pronounced in densifying TOAs, where land is becoming increasingly scarce.

Infrastructure Capacity

Amenity Provision

Transit Access

Inter-Governmental Collaboration

Livability

ACCs & DCCs

Financial Capacity

Infrastructure Capacity

Affordability

Capacity of Municipal Staff

“Our staff, without exaggeration, were pulling all-nighters to prepare materials. We were trying to justify and explain a plan that we didn’t fully author. It’s been a lot of work and a very top-down approach.”

Operational Capacity

Bylaw & Policy Updates

Interpreting Legislation

Financial Capacity

OCPs

One of the persistent challenges emphasized by public-sector planners was the difficulty of municipal staff to satisfy the demands of the new housing mandates. Meeting the various deadlines imposed by the Province—adopting TOA bylaws, conducting HNRs, updating OCPs and zoning bylaws, Anecdotes described poor working conditions as staff struggled to meet the deadlines.

Although the Province allocated a pool of funding to assist municipalities with implementing the housing mandates, public-sector interviewees generally viewed this support as limited in utility. The one-time disbursement could only be utilized to hire consultants, who had limited ability to help local governments develop foundational documents intended to address specific, local needs. More broadly, interviewees agreed that funding was not the primary barrier to implementing the legislation, but rather, organizational capacity posed a much greater challenge.

While this concern about deadlines was frequently raised, it may fall outside the scope of actionable recommendations for this project. Since these challenges revolve around bylaw and policy updates, they will subside over time. The final initial deadline of the mandates is for municipalities to update their OCPs by December 31, 2025. This makes it difficult to provide recommendations that would meaningfully impact the process within this time frame.

What We Did Not Hear

(as much as expected)

Preface

While developing the interest-holder interview plan and methodology, a list of anticipated issues was created based on the findings of the **Media Scan** scan, literature review, existing knowledge of community planning, as well as the context of Metro Vancouver. This list was used to help with both the selection of interviewees and the design of our questions.

In many cases, the issues raised in the interviews did not perfectly conform with our expectations. While some topics were raised more frequently or deemed more impactful than we anticipated, the following list comprises several topics that were either mentioned less frequently than expected or were generally said to be non-issues or non-priorities.

We will consider these topics for further analysis in the next phase of the project, as it is possible that they were merely not covered within our relatively small sample of interviewees. In addition, the perception among politicians, the public, and the members of our studio team that these topics may be prominent in spite of what we heard from professionals may be worth analyzing in and of itself.

Environmental Harms of Densification

Densification has long been recognized as a critical strategy for sustainable urban development, and this perspective was echoed by many of our interviewees. The environmental benefits of densification more broadly outweighed the few local concerns that were raised. For instance, several interviewees highlighted the potential loss of tree canopy resulting from the increased developable area and permitted density enabled by Bills 44 and 47. This commentary, however, focused more on the need for efficient land use than on the potential negative externalities of densification.

Topographical Concerns within TOAs

We expected to hear challenges about the blanket approach of Bill 47's TOAs. Particularly, the creation of an 800 m development radius around SkyTrain stations may be incompatible with the topography of various TOAs. This was not a challenge identified by any interviewees and was even dismissed as a negligible concern. For example, when asked whether elevation changes within TOAs hinder walkability, one interviewee stated this was not a concern, nor one that could not be mitigated with last-mile transportation. They clarified that it would unlikely discourage residents from residing in the area or utilizing public transportation.

Jurisdictional Overreach

One prevailing narrative that emerged in our media scan was that the Province was infringing on local authority. From a legal perspective, this was immediately proved false, as Provincial Governments have always maintained authority over land use in Canada. While the housing mandates may go against the convention of delegating most land use powers to municipal governments, our interviewees were relatively unconcerned with the Province overstepping boundaries, especially in an effort to address the housing crisis.

Neighbourhood Character

We anticipated public sector planners to criticize the regulation of built form within TOAs because proposed developments may not be aesthetically aligned with the surrounding area, the preferences of existing residents or OCPs. While this concern did emerge from some politicians and members of the public in comments to the media, the consensus among interviewees was that meeting housing needs and increasing affordability are much more significant planning priorities than neighbourhood aesthetics.

Appendix 4: Livability Metrics of all SkyTrain TOAs



Livability Metrics

The following table outlines the key metrics we used to assess livability in the 64 SkyTrain TOAs across nine Metro Vancouver municipalities. These factors evaluate the existing conditions of the TOAs in terms of accessibility, inclusivity, sustainability and overall quality of life, all of which are essential for fostering complete communities.

Metric	Description	Relevance to Livability
Stations in Use	SkyTrain stations that are currently operational as of the date of this report	The presence of an active SkyTrain station improves accessibility, reducing commute times and reliance on cars, which enhances sustainability and mobility for residents.
Existing Area Plans	Includes secondary plans, specifically local area plans and TOD plans	Secondary plans help guide growth in a structured way, ensuring that new developments are well-integrated with transportation, services and community needs.
Planned Growth Areas	Areas identified by Metro Vancouver as <i>Urban Centres</i> , or <i>Frequent Transit Development Areas</i> or designated by municipalities for economic growth.	These areas are prioritized for densification and economic activity, supporting job creation, business development, and increased housing supply.
High Green Space Provisions	TOAs with a high proportion of parks or green space compared to the 64 SkyTrain TOAs.	Access to parks and green space is crucial for mental and physical well-being, promoting creating recreation, environmental sustainability, and quality of life.
High Land Use Mixes	TOAs with high Land Use Mixes in Metro Vancouver's Walkability Index 2021 Report	A mix of residential, commercial, and institutional uses within TOAs support vibrant, walkable communities where people can live, work and access services within close proximity.
High Walkability	TOAs with high Walkability Indexes in Metro Vancouver's Walkability Index 2021 Report	Walkable communities reduce car dependency, improve public health, support local businesses, and create more socially connected neighbourhoods.
High Ethnic Diversity	TOAs with Ethnic Diversity indexes ranging from 0.61 to 1.00 in Metro Vancouver's Inequity Baseline Data Indicator Maps (2021) .	Diverse communities foster cultural exchange, social cohesion, and equitable access to resources and services for residents of different backgrounds.
Low Core Housing Needs	TOAs with less than 20% of households in core housing needs	A lower percentage of households in core housing need indicates better access to affordable, suitable, and adequate housing, contributing to overall stability and well-being.

1. Burnaby

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Brentwood Town Centre	x	x	x				x	
2	Edmonds	x	x	x	x				
3	Gilmore	x	x	x				x	
4	Holdom	x	x	x					
5	Lake City Way	x	x						x
6	Lougheed Town Centre	x	x	x					
7	Metrotown	x	x	x			x		
8	Patterson	x	x	x	x				
9	Production Way-University	x	x						x
10	Royal Oak	x	x	x			x		
11	Sperling-Burnaby Lake	x	x	x	x				x
Total		11	11	9	3	0	2	2	3

2. Coquitlam

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Burquitlam	x	x	x					
2	Coquitlam Central	x	x	x	x				
3	Lafarge Lake-Douglas	x	x	x					
4	Lincoln Station	x	x	x					
Total		4	4	4	1	0	0	0	0

3. Langley

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Langley City Centre		x	x					
Total		0	1	1	0	0	0	0	0

4. New Westminster

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	22nd Street	x	x	x				x	
2	Braid	x		x					
3	Columbia	x		x		x	x		
4	New Westminster	x		x		x	x		
5	Sapperton	x		x		x			
Total		5	1	5	0	3	2	1	0

5. Port Moody

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Inlet Centre	x	x	x					
2	Moody Centre	x	x	x	x	x			
Total		2	2	2	1	1	0	0	0

6. Richmond

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Aberdeen	x	x	x					
2	Bridgeport	x	x	x					
3	Capstan	x	x	x					
4	Lansdowne	x	x	x					
5	Richmond-Brighouse	x	x	x					
Total		5	5	5	0	0	0	0	0

7. Surrey

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Gateway	x	x	x		x	x	x	
2	King George	x	x	x	x	x	x	x	
3	Scott Road	x	x	x				x	
4	Surrey Central	x	x	x		x	x	x	
5	152 St							x	
6	Bakerview-166 St				x		x	x	
7	Clayton		x				x		x
8	Fleetwood						x	x	
9	Green Timbers		x	x	x			x	
10	Hillcrest-184 St		x		x				x
Total		4	7	5	4	3	6	8	2

8. Township of Langley

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	Langley City Centre		x	x					
Total		0	1	1	0	0	0	0	0

9. Vancouver

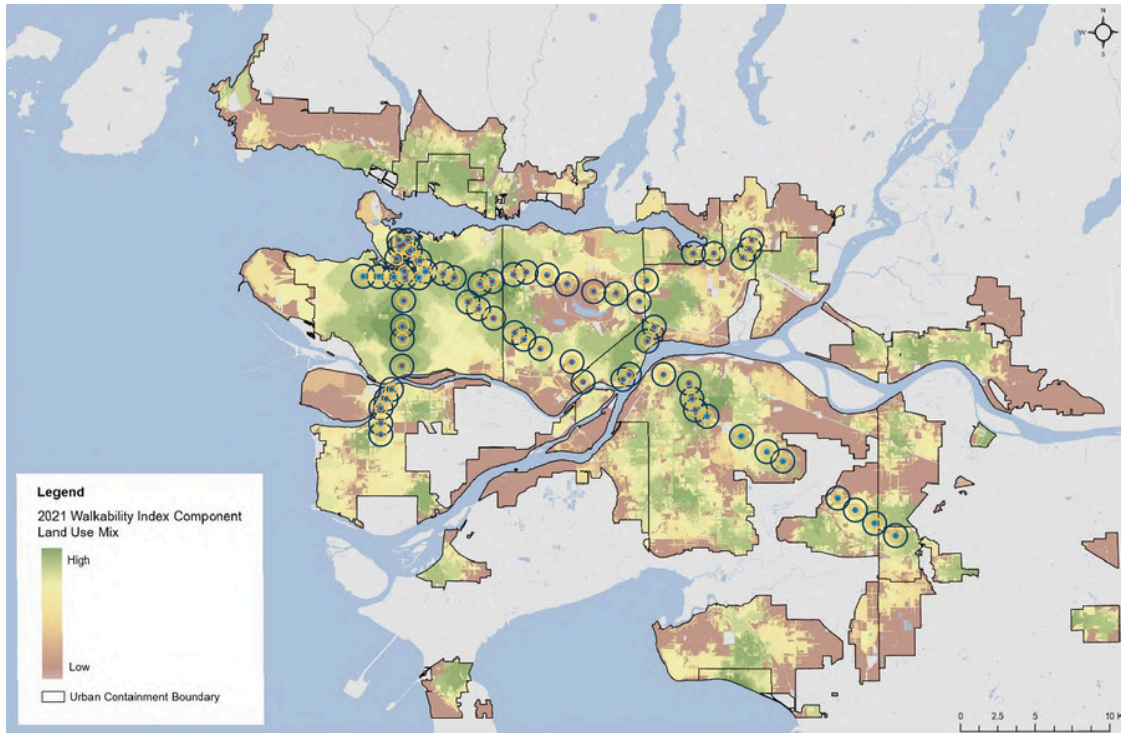
#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
1	29th Avenue	x			x		x		
2	Broadway-City Hall	x	x	x			x		
3	Burrard	x					x		
4	Commercial-Broadway	x	x	x		x	x		
5	Granville	x					x		
6	Joyce-Collingwood	x		x			x	x	
7	King Edward	x	x	x		x	x		x
8	Langara-49th Avenue	x	x	x	x	x			
9	Main Street-Science World	x		x	x		x		
10	Marine Drive	x	x	x		x			
11	Nanaimo	x					x		

9. Vancouver (cont.)

#	SkyTrain Station Name	Stations In Use	Existing Area Plans	Planned Growth Areas	High Green Space Provisions	High Land Use Mixes	High Walkability	High Ethnic Diversity	Low Core Housing Needs
12	Oakridge-41st Avenue	x	x	x		x			
13	Olympic Village	x	x		x		x		
14	Renfrew	x	x	x		x	x		
15	Rupert	x	x	x				x	
16	Stadium-Chinatown	x		x			x		
17	Vancouver City Centre	x					x		
18	VCC-Clark	x		x					
19	Waterfront	x					x		
20	Yaletown-Roundhouse	x		x			x		
21	Arbutus		x	x			x		
22	Great Northern Way-Emily Carr		x	x			x		
23	Mount Pleasant		x	x			x		
24	Oak-VGH		x	x			x		
25	South Granville		x	x			x		
Total		20	14	18	4	6	20	2	1

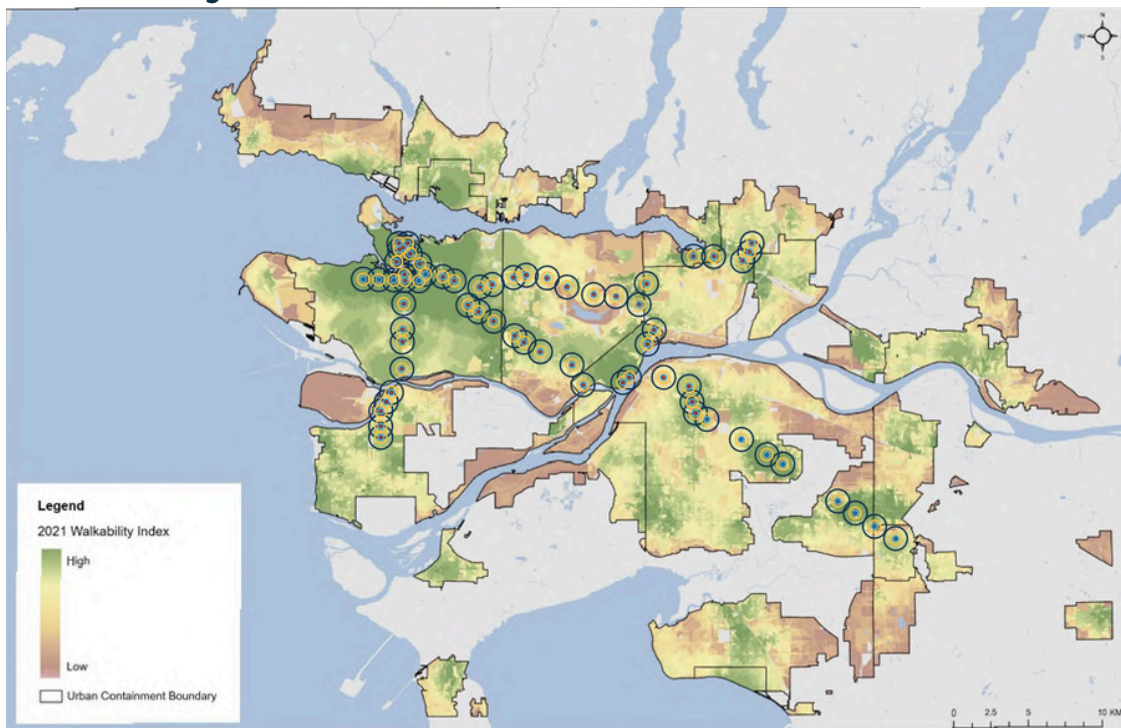
Referenced Maps

Land Use Mixes



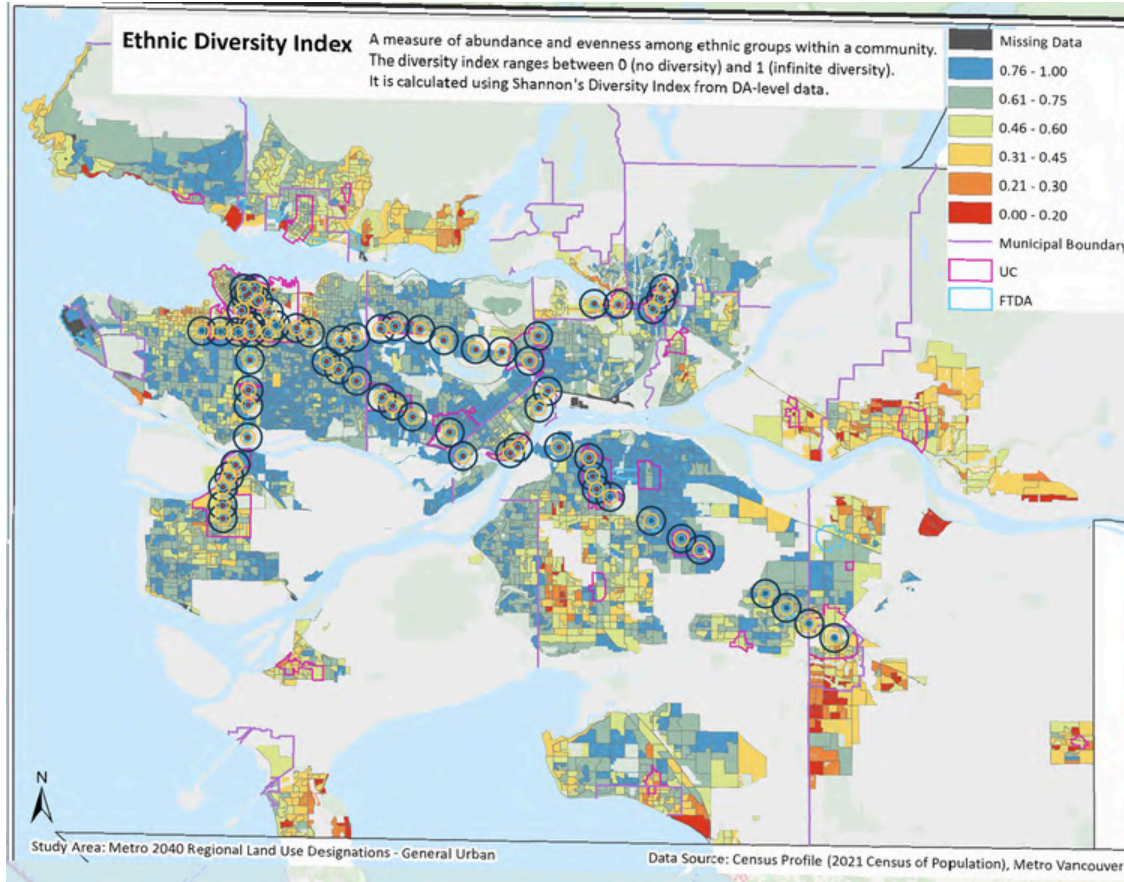
We georeferenced the original maps from Metro Vancouver's [Walkability Index 2021 Report](#) to indicate the locations of the 64 SkyTrain TOAs.

Walkability



Referenced Maps

Ethnic Diversity



We georeferenced the original map from Metro Vancouver's [Inequity Baseline Data Indicator Maps \(2021\)](#) to indicate the locations of the 64 SkyTrain TOAs.

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