REPORT CARD ON MORE AND BETTER HOUSING

AN ASSESSMENT OF CANADA'S PROGRESS TOWARD BUILDING 5.8 MILLION HOMES THAT ARE AFFORDABLE, LOW-CARBON AND RESILIENT

MAY 2025

More and Better Housing Canada

Missing Middle Initiative

This report is authored by Mike Moffatt and the Missing Middle Initiative. The Missing Middle Initiative is housed at the University of Ottawa's Institute for the Environment, where it explores the barriers preventing young Canadians and new families from entering the middle class and the policy solutions to support a thriving, urban middle class in Canada.
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moreandbetterhousing.ca

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More and Better Housing Canada

Missing Middle Initiative

REPORT CARD ON MORE AND BETTER HOUSING

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EXECUTIVE SUMMARY

Canada needs to build millions more homes, but not just any homes. They must be homes built for the needs of today: affordable, aligned with our climate goals, and resilient to worsening extreme weather. This is no small feat. It will require bold reforms across all orders of government. Yet provincial governments, who hold many of the policy levers, are lagging behind.

In 2023, 15 housing policy experts came together to form the Task Force for Housing and Climate to provide practical, actionable advice to all orders of government. Their work resulted in the *Blueprint for More and Better Housing*, a comprehensive set of more than 140 policy actions for adding 5.8 million homes by 2030 that are affordable, low carbon and resilient.

Since its publication in March 2024, many governments have adopted *Blueprint* recommendations. The federal government introduced tax reforms to spur rental housing construction, made federal land available for lease to build new housing, and reformed and enhanced housing financing programs, all of which are recommendations found in the *Blueprint*.

Municipalities across Canada have instituted *Blueprint*-inspired zoning reforms to allow for more family-friendly density in their communities. Sometimes, municipalities did this of their own volition, but often, they were incentivized to do so by the federal Housing Accelerator Fund.

Provinces, however, control most of the policy levers for increasing housing supply, particularly since municipalities are "creatures of the province," operating under provincial regulations, such as Ontario's *Development Charges Act*.

Some progress has been made: British Columbia has eased egress requirements for apartments, and Ontario has relaxed parking minimums, helping to increase gentle density. However, provincial reforms are often accompanied by poison pills, from height maximums to high taxes to slow approval times, which render these reforms ineffective. As a result, housing starts were down over 30% in both Ontario and British Columbia in the first quarter of 2025 relative to 2024, as these reforms were unable to counterbalance the conditions set by the provinces.

In this Report Card, commisioned by the Task Force, the performance of the federal government and each of the provinces has been graded relative to the *Blueprint*, through the end of 2024, and recommendations provided to each.

The federal government receives the highest grade overall but still needs to enhance transparency in programs like the Housing Accelerator, and should institute a Nationwide Hazard Mapping Initiative to ensure that homes are not built in areas prone to flooding or wildfires.

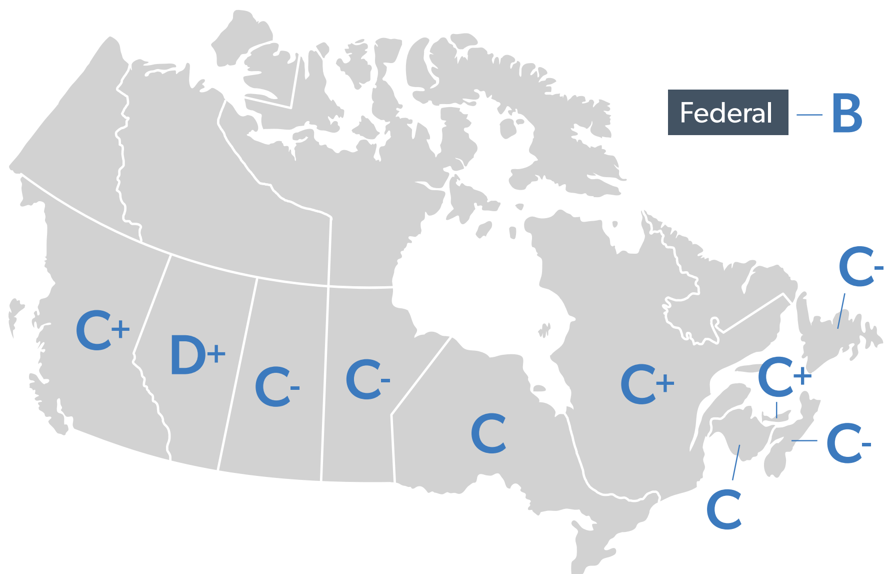
For provincial governments, the picture is less encouraging: none scored above a C+, as high development fees, sluggish approval processes, and uneven policy reforms continue to hinder housing progress.

Among provincial governments, Prince Edward Island, Québec and British Columbia earned the top marks. PEI has taken meaningful steps to increase supply, though now must focus more on ensuring homes are energy efficient and can withstand extreme weather conditions. British Columbia has instituted the most ambitious reforms, but their overall performance is undermined by high (and still rising) municipal development charges and some of the slowest permitting approval times in the country.

Alberta's provincial government received the lowest grade among our 11 jurisdictions. While housing supply has been rapidly increasing in the province, that is largely due to reforms made by municipal governments, rather than the Government of Alberta. Alberta has done less to legalize family-friendly density than other provinces and is lagging on resiliency and energy efficiency.

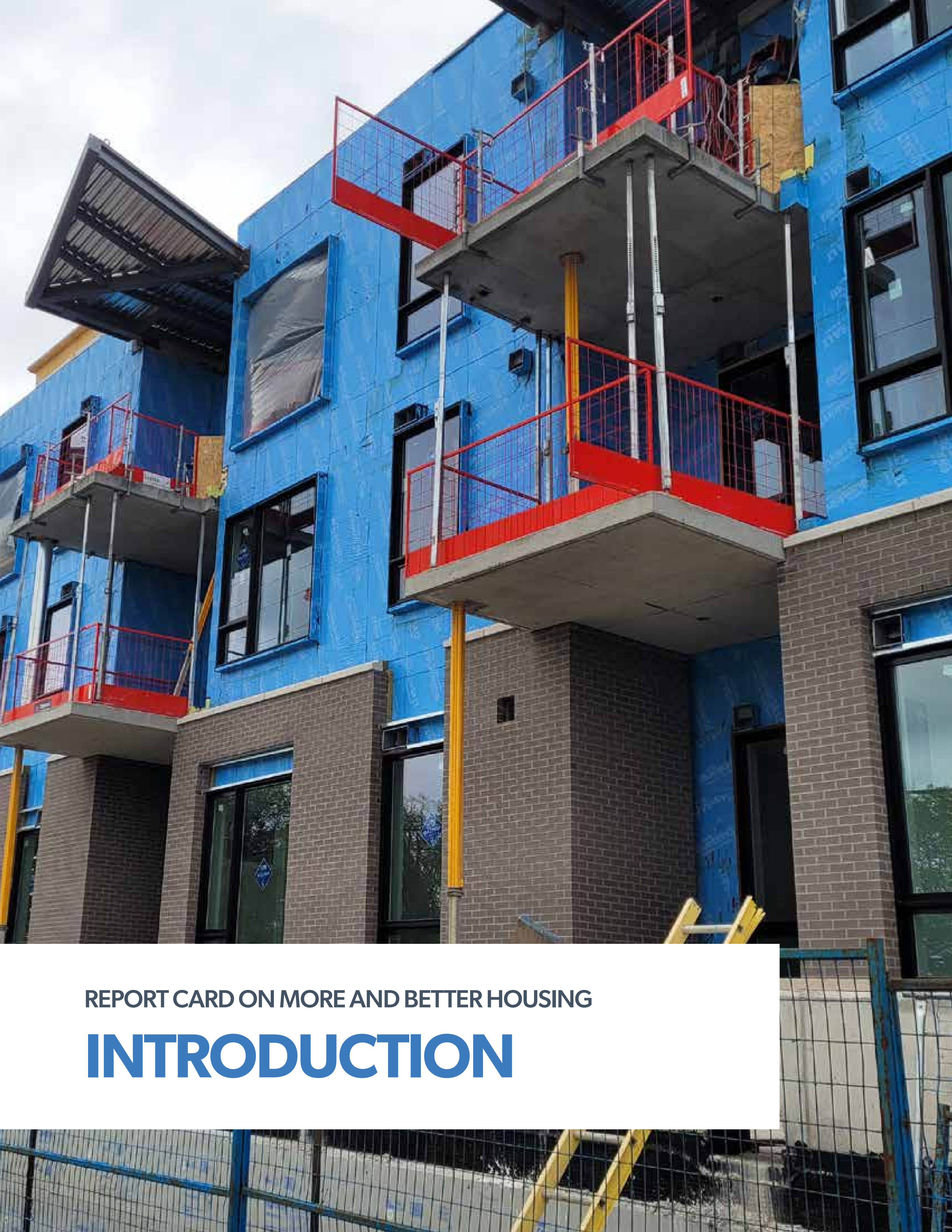
Given the housing challenge we face as a nation, it is more important than ever for all three levels of government to work together towards a common goal of building millions of new affordable, low-carbon and resilient homes. The policy solutions exist; what we need is the political will, especially at the provincial level, to enact them.

OVERALL GRADES - PROVINCIAL & FEDERAL GOVERNMENTS



AGGREGATE GRADES - PROVINCIAL & FEDERAL GOVERNMENTS

Government	TOTAL	Legalizing Density	Better Building Codes	Factory-Built Housing	Avoiding High-Risk Areas	Fill-in Market Gaps
Federal	**B**	B	B	A-	C+	B+
Québec	**C+**	D+	D	B	B+	B
Prince Edward Island	**C+**	C	D+	C+	C	A
British Columbia	**C+**	D+	A	B+	D	D+
New Brunswick	**C**	C-	B	C	C	C+
Ontario	**C**	D-	C+	C	A	D-
Saskatchewan	**C-**	D+	D	F	A	C+
Nova Scotia	**C-**	C+	B	F	C	D
Newfoundland and Labrador	**C-**	D+	D	F	B-	B
Manitoba	**C-**	D	D	D	C	B-
Alberta	**D+**	C-	D	D-	D	C



REPORT CARD ON MORE AND BETTER HOUSING

INTRODUCTION

In September 2023, 15 housing experts from across Canada formed the Task Force for Housing and Climate. Their goal was to advise governments on the policies needed to build 5.8 million new affordable, low-carbon and resilient homes by 2030. In March 2024, they released the Blueprint for More and Better Housing, containing over 140 actionable recommendations.

From the outset, the Task Force identified four national goals:

1. **MAKE IT LOW-CARBON**: Cut housing-related emissions to meet Canada's 2030 climate targets.
2. **MAKE IT RESILIENT**: Ensure every home built from 2025 onward can withstand worsening climate hazards, aligning with Canada's National Adaptation Strategy.
3. **MAKE IT AFFORDABLE**: Cut the number of households spending more than 30% of their income on shelter costs to zero by 2031.
4. **MAKE IT AT SCALE**: Increase the scale and productivity of the homebuilding sector to build 5.8 million homes between 2022 and 2030.

The Task Force commissioned three research reports on the climate impacts of new housing, examining the impact of changes to land-use, construction of homes and infrastructure, and home energy efficiency. Informed by this research, the Task Force determined that governments must focus on five factors to ensure they can meet each of the goals: where we build, what we build, how we build, why we build, and laying the foundations for success.

At first, these four goals may appear to be at odds with each other or at least contain significant trade-offs. Yet, as the Task Force's follow-up report ***Four Pathways to Housing Affordability*** demonstrated, well-designed policies can advance all four simultaneously. Scaling up homebuilding, reducing emissions, or increasing the resiliency of homes can also enhance affordability—by reducing construction costs, decreasing or slowing the growth in property tax increases, slashing energy bills, and lowering insurance and maintenance costs for homeowners and renters.

Since the Blueprint's release, governments across Canada, particularly the federal government and municipalities, have taken action. The federal government has introduced tax incentives for apartment construction, made public land available for housing, and made innovations in housing investment—and more Blueprint-inspired recommendations likely to be enacted in 2025. Municipalities have moved on zoning and density reforms, often encouraged by federal incentives like the Housing Accelerator Fund.

Provincial governments, however, have been slower to act., though some progress is being made. While some have taken positive steps—such as British Columbia's legalization of single-egress apartments and Nova Scotia's adoption of higher building code tiers—most lag behind.

To track progress and spotlight where more action is needed, the Task Force developed this ***Report Card on More and Better Housing***. It evaluates the federal government and 10 provinces on five criteria and outlines the top priorities for each of the 11 governments in the year ahead. Our goal is to support faster, smarter, and more coordinated action to meet Canada's housing and climate needs.

REPORT CARD ON MORE AND BETTER HOUSING

GRADING KEY

Grading each government's performance relative to the Blueprint for More and Better Housing is no simple task, given the Blueprint's length and complexity. The Blueprint includes 10 recommendations per order of government, each with numerous sub-actions—amounting to more than 50 distinct policy actions for both the federal government and the provinces.

Recognizing the complexity, the Task Force identified four "game changers" prior to the Blueprint's release: high-impact priorities designed to help governments act quickly. While these were well received, some analysts and advocates rightly noted a critical omission: the lack of a specific focus on social and non-market housing. We acknowledge this oversight and, in response, have added a fifth game changer to guide this evaluation.

Ideally, we would assess governments based on outcomes: Have homes become more affordable? Has construction increased? Are we on track to meet climate targets for housing? Unfortunately, not enough time has passed since the Blueprint's release to meaningfully evaluate long-term impacts. As a result, we have focused this report card on actions taken, and their alignment with the Blueprint's goals.

To keep the evaluation manageable and meaningful, we use the five ***game changers*** as the core grading criteria, as follows:

1. **Legalize density:** Focusing housing growth in cities and communities, where there is existing infrastructure like roads and water lines, is faster, less costly, lower carbon and more resilient.
2. **Implement better building codes:** Better building form can reduce operating costs, cut emissions, and improve resilience.
3. **Invest in factory-built housing:** Support innovations that lower construction costs and standardize affordable, resilient, low-carbon design.
4. **Avoid high-risk areas:** The most expensive home is the one you need to rebuild after an extreme weather event.
5. **Fill in market gaps:** Even under optimal conditions, many families will be unable to afford market-rate housing. Governments play a vital role in ensuring access to non-market and below-market-rate housing options.

Each jurisdiction—the federal government and the 10 provinces—is assigned a letter grade in each category based on their policy environment as of December 31, 2024. While we refer to specific recommendations in the Blueprint, our grading allows for flexibility. Governments that adopt alternative, but similarly effective policies, receive credit.

We also account for "Potemkin reforms"—policies that may appear to be aligned with the Blueprint but are undermined by counterproductive conditions. For example, legalizing fourplexes while mandating one parking space per unit and imposing exorbitantly high development charges may effectively block new housing from being built. Our analysis evaluates reforms in the context of the broader policy landscape within each jurisdiction.

The highest overall grade, a B, was awarded to the federal government for reforms enacted by the end of 2024. Four A grades were awarded for specific categories:

- British Columbia for building code modernization
- Ontario and Saskatchewan for restricting development in high-risk areas
- Prince Edward Island for its progress on non-market housing

Additionally, the federal government earned an A- for its support of the factory-built housing sector—excluding any commitments made by the incoming Federal government in April 2025.

CRITERION 1

LEGALIZING DENSITY

LEGALIZING DENSITY: GRADES

Government	Grade	Comments
Federal	B	Tools like the Housing Accelerator Fund and the Canadian Housing Infrastructure Fund are creating change at the municipal level. Enforcement and transparency remain issues.
Nova Scotia	C+	The province has made modest reforms under Bill 6 and Bill 222. Municipal charges remain low, and municipal timelines are improving.
Prince Edward Island	C	PEI's Building Together strategy provides a vision, but further policy tools are needed. Development charges on density remain the lowest in the country, and municipal timelines are among the best.
Alberta	C-	Very little progress has been made by the provincial government, but municipal governments are implementing reforms. Municipal charges are relatively low, and timelines are relatively fast.
New Brunswick	C-	Modest reforms in the Assessment Act and the Community Planning Act. Municipal fees and timelines among the best in Canada.
British Columbia	D+	Significant reforms are outlined in Bills 16, 44, and 47. Reasonable approval timelines, although there is room for improvement. High municipal charges make building gentle density cost-prohibitive.
Saskatchewan	D+	Little progress has been made beyond the Saskatchewan Secondary Suite Incentive Grant Program. Very low municipal charges and municipal charges on density.
Newfoundland and Labrador	D+	Modest, but beneficial reforms as part of the province's Five-Point Plan. Among the lowest development costs in Canada, although there is room for improvement with municipal timelines.
Quebec	D+	Modest reforms through Bill 31. We lack the data to assess municipal fees and timelines.
Manitoba	D	Municipalities are doing the heavy lifting on reforms. Municipal charges on density are low, but timelines are moving in the wrong direction.
Ontario	D-	Despite anti-fourplex rhetoric from Premier Ford, the Ontario government has made some helpful reforms as part of Bill 23, as well as the 2024 provincial policy statement. However, exceptionally long approval timelines and the highest municipal charges in Canada make building gentle density economically prohibitive.

LEGALIZING DENSITY: WHY IT MATTERS

Legalizing family-friendly, gentle density is the single most important thing Canada can do to achieve all four of the Blueprint goals simultaneously. The location of new housing development—***where we build***—has profound implications for affordability, climate resilience, emissions reduction, and construction scale:

WHERE WE BUILD: *Building in cities and communities, where there is existing infrastructure, makes more efficient use of land, lowering both greenhouse gas emissions and per-unit land costs. It keeps municipal property taxes low through more efficient use of infrastructure while producing housing more quickly and at lower cost while also creating homes that are greener and more resilient to the impacts of climate change. As such, legalizing density is the single most significant multi-solution opportunity for building more and better homes.*

Affordability is particularly enhanced through the legalization of gentle density. While the Task Force adopted the federal benchmark of affordability—households spending no more than 30% of their income on shelter costs—the ***Four Pathways to Housing Affordability*** report underscores that transportation costs often rival housing costs for many families. These costs are directly shaped by where people live. Allowing families to live in neighbourhoods with more transit and active mobility options, transportation costs can be greatly reduced. A holistic view of affordability—one that includes both housing and transportation—makes the case for gentle density even more compelling.

Gentle density comes in a variety of forms, including, but not limited to, fourplexes, courtyard buildings, and mid rise apartment buildings. Despite the value of these structures in creating housing options for families that require three or more bedrooms, a variety of zoning, building code, and taxation issues have rendered them illegal in some locations, and economically infeasible in others. The Blueprint includes a targeted set of policy actions to remove these barriers and make gentle density a viable, scalable solution across Canada.

LEGALIZING DENSITY: KEY POLICY ACTIONS

The Blueprint makes a series of recommendations to help make family-friendly gentle density both legal and economical. There are two recommendations in the provincial blueprint which are of particular importance:

> ***I.1 Abolish parking minimums, unit maximums, and limit exclusionary zoning in municipalities through binding provincial action to allow "as of right" residential housing.***

V.1.iii Create a more permissive land use, planning, and approvals system, including establishing province-wide zoning standards, or prohibitions, for minimum lot sizes, maximum building setbacks, minimum heights, angular planes, shadow rules, front doors, building depth, landscaping, floor space index, and heritage view cones and planes.

We will provide particular attention to these two recommendations when assessing provincial performance.

Because land-use planning falls primarily under provincial jurisdiction, the federal government has limited authority to legalize density directly. It can, however, incentivize other governments to legalize density. The Blueprint recognized this, with recommendation I.1 in the federal section advocating that the government "[t]ie all federal infrastructure, transit, and housing funding to provincial and municipal adoption" of pro-density policies. "Federal dollars for municipal housing reforms" was not a novel idea, as the Liberal Party's 2021 platform promised the creation of the Housing Accelerator Fund, which was launched in March 2023.

The implementation of the Housing Accelerator Fund has not been without challenges. Chief among them is a lack of transparency, leaving it unclear if requirements being placed on municipalities are being enforced. The federal government has recognized this and committed to "publicly reporting on municipalities' progress to speed up permitting and approval timelines and implement other commitments under the Housing Accelerator Fund." Despite these hurdles, many municipalities have enacted reforms that comply with, or go beyond, the requirements of the Housing Accelerator—London, Ontario, for example, legalized four-storey stacked townhouses on neighbourhood connector streets.

We also must recognize that simply changing one policy, such as minimum lot size rules, may not be enough to create the conditions for family-friendly density. Legalization is often only the first step. In many jurisdictions, long approval timelines or high taxes on infill development can render these housing forms uneconomical, even if they are technically permitted.

In fact, infill projects that aim to introduce gentle density often face a more complex and drawn-out regulatory process than suburban greenfield developments.

In the words of Environmental Defense's Mid-Rise Manual, we need to make these homes "legal, practical and cost-effective to build". Legalization is necessary, but it is not sufficient. Policy reforms are also needed to make them practical and cost-effective.

For Criterion 1, our grades consider approval speeds and municipal construction taxes where possible. While these approval processes and taxes on construction are usually municipal rather than provincial, they fall under the auspices of provincial regulation. As such, we will consider them in our analysis, as the Blueprint repeatedly advises provincial governments to incentivize or mandate changes at the municipal level.

LEGALIZING DENSITY: CURRENT STATE OF PLAY

Before we examine policy changes, we should first understand the baseline: approval times and municipal construction taxes. Data on these is particularly hard to find, which motivated the Task Force to recommend that the CMHC create a Comprehensive Housing Data Repository to collect and make this data publicly available.

In the meantime, the best available data source is the Canadian Home Builders' Association's *2024 Municipal Benchmarking Study*, which includes information from 23 municipalities across nine provinces (excluding Quebec). According to the study, municipalities in Ontario and British Columbia tend to have the longest approval timelines. While some jurisdictions have seen modest improvements or stable processing times, others—such as Winnipeg and three Ontario communities—have seen performance decline.

Average Timeline Comparison, by Study Municipality, 2022 & 2024

Canadian Home Builders' Association - 2024 Municipal Benchmarking Study

		2022 Study	2024 Sutdy	Trend in Time	
Rank	Municipality	*Months*		*Difference*	*Change*
1	Saskatoon	4.1	2.0	(2.1)	Better
2	Moncton	n.d	2.4	n.d	n.d
3	Regina	4.2	3.2	(1.0)	Better
4	Edmonton	10.5	3.4	(7.1)	Better
5	Charlottetown	3.4	3.5	0.1	Same
6	Calgary	5.4	4.2	(1.1)	Better
7	London	10.1	4.6	(5.6)	Better
8	Kelowna	5.7	5.8	0.1	Same
9	Surrey	13.8	5.9	(7.9)	Better
10	Kamloops	9.1	6.9	(2.1)	Better
11	Vancouver	15.2	7.7	(7.5)	Better
12	St. John's	9.4	8.6	(0.9)	Same
13	Halifax	20.8	9.8	(11.0)	Better
14	Winnipeg	5.0	10.1	5.1	Worse
15	Oakville	13.9	14.1	0.2	Same
16	Brampton	19.1	14.1	(5.0)	Better
17	Burnaby	20.9	15.9	(5.0)	Better
18	Ottawa	13.0	16.9	3.9	Worse
19	Pickering	20.7	17.3	(3.4)	Better
20	Markham	23.5	22.6	(0.9)	Same
21	Bradford West Gwillimbury	20.4	23.5	3.1	Worse
22	Toronto	32.0	25.0	(7.0)	Better
23	Hamilton	22.9	31.0	8.1	Worse
Average		**13.8**	**11.6**	**(2.1)**	**Better**

To assess the impact of impact of municipal fees on infill development, we use the CHBA's ***high-rise*** measure, which considers the scenario of a building containing 75 bachelor and 1-bedroom apartments (averaging 650 sq. ft.) and 75 2-bedroom apartments (averaging 750 sq. ft.) to estimate a per-unit charge. While this approach does not include the larger, family-sized units often found in gentle density developments, it provides a reasonable benchmark for development charges and other fees on construction.

Criterion 1

Fees in Ontario and British Columbia significantly exceed those in other provinces—and have also increased more sharply in recent years. The per-unit charge in Calgary, the city with the highest fees outside of Ontario and British Columbia, still imposes less than half that of the listed communities in British Columbia and Ontario. These high fees make it unlikely that cities in these communities will be able to build gentle density at any scale, even if pro-density legalization policies are enacted.

Development Fees, New High-Rise Residential Development, by Municipality, 2024

Canadian Home Builders' Association

Municipality	Total Infrastructure Related Fees	Planning Applicationa and Building Permit Fees	Per Unit	2022 Rates	Change 2022-2024	Total Fees per Sq. Ft, 2024
	Per Unit, $					Per Sq. Ft.
Toronto	129,900	5,000	134,900	99,890	35,010	190.0
Markham	117,200	6,300	123,500	110,890	12,610	173.9
Vancouver	118,400	3,800	122,200	125,540	(3,340)	172.1
Brampton	89,900	3,500	93,400	79,650	13,750	131.5
Pickering	77,000	4,900	81,900	64,080	17,820	115.4
Oakville	70,500	9,000	79,500	74,640	4,860	112.0
Burnaby	53,000	6,600	59,600	19,260	40,340	83.9
BWG*	54,200	4,200	58,400	53,850	4,550	82.3
Surrey	56,200	1,900	58,100	48,650	9,450	81.8
Hamilton	48,400	3,400	51,800	41,690	10,110	73.0
Ottawa	36,300	1,800	38,100	35,080	3,020	53.7
Kelowna	18,200	12,700	30,900	-	30,900	43.5
London	26,100	1,100	27,200	22,280	4,920	38.3
Calgary	6,800	4,300	11,100	16,990	(5,890)	15.6
Saskatoon	5,900	3,400	9,300	6,460	2,840	13.1
Regina	4,300	4,700	9,000	3,960	5,040	12.7
Kamloops	6,400	2,100	8,500	-	8,500	12.0
Halifax	6,600	1,400	8,000	10,740	(2,740)	11.3
Moncton	5,600	1,600	7,200	2,300	4,900	10.1
Edmonton	1,500	5,400	6,900	6,600	300	9.7
Winnipeg	2,300	4,000	6,300	3,070	3,230	8.9
St. John's	1,700	2,700	4,400	1,460	2,940	6.2
Charlottetown	-	1,600	1,600	-	1,600	2.3
Maximum Value	129,900	12,700	134,900	125,540	40,340	190.0
Minimum Value	-	1,100	1,600	-	(5,890)	2.3
Weighted Average	31,000	4,000	35,000	32,000	3,000	49.3

Federal and provincial progress on legalizing family-friendly density

The federal government and several provinces have enacted a series of policies to help legalize family-friendly density. Below is a non-exhaustive list of recent reforms.

Federal government

While the federal government has few tools to directly legalize density, it can encourage reform through funding incentives.

Criterion 1

Notable initiatives include:

- The Housing Accelerator Fund (2023): requires municipalities to agree to a series of pro-density reforms in exchange for support.
- The Canadian Housing Infrastructure Fund (CHIF)—Budget 2024, Aligns closely with Blueprint Recommendation I.1 by tying infrastructure funding to policy changes. Key conditions include:
    - Zoning for "four units as-of-right" on serviced lots (i.e. water and sewer) in residential areas in municipalities with populations over 30,000 (Blueprint Rec. I.1.i).
    - Provincial collaboration on a federal housing design catalogue to facilitate standardized housing designs and support for municipalities implementing these measures. (Blueprint Key Takeaway #1).
    - Implement the 2025 and future National Model Codes within 18 months of their publication. (Provincial Recommendation III.3)
    - Provinces must work with Canada to support innovations to improve housing supply, such as:
        - single egress construction (Provincial Recommendation III.6)
        - code digitization (Recommendation IX.3.iv)

British Columbia: High development charges and slow approval processes violate the practical and cost-effective tests set by the Mid-Rise Manual. The province has, however, enacted a series of legalization reforms, including:

- Reforms to accelerate approval speeds (Bill 16, 2024).
- Reforms to legalize small-scale multi-unit residential, including secondary suites in single-family dwellings, detached accessory dwelling units (ADUs), like garden suites or laneway homes, triplexes, townhomes and house-plexes. This reform was in Bill 44, passed in 2023, and is aligned with Recommendation I.1.i in the Blueprint.
- Bill 47, passed in 2024, increased density and eliminated parking minimums near transit stations.

Municipal Innovation: Edmonton's Leadership

Municipalities are making efforts to accelerate their approval processes beyond the requirements placed on them by the federal government through the Housing Accelerator or by provincial governments. In September 2024, Edmonton became the first city in Canada to institute an automated permit review process. This can speed up parts of the permitting process by 95% or more and provides a best practice for other municipalities to follow.

CRITERION 2

BETTER BUILDING CODES

BETTER BUILDING CODES: GRADES

Government	Grade	Comments
British Columbia	A	British Columbia leads the way on both adoption of higher tiers of the building code and with single egress apartment reforms.
Nova Scotia	B	Nova Scotia has increased their ambition in recent years, with plans to adopt higher tiers of the NBC and NECB.
Federal	B	In September 2024, the National Research Council of Canada launched consultations to study single egress design in residential buildings. The consultations specifically refer to the British Columbia reforms.
New Brunswick	B	New Brunswick has adopted Tier 2 of the NBC.
Ontario	C+	Ontario has adopted provisions that exceed Tier 1 of the NBC. Recommendation 3b of the provincial government's 2022 Housing Affordable Task Force report called for the legalization of single egress apartments of up to 4 storeys.The province has not adopted this recommendation.
Prince Edward Island	D+	In December 2024, the federal government gave the province $2.4 million through the Codes Acceleration Fund to conduct a feasibility study in adopting higher code tiers.
Alberta	D	The 2023 Alberta Edition of the National Building Code went into effect on May 1, 2024. The code allows for the construction of mass timber construction up to 12 storeys. Poor residential building code score.
Québec	D	Modest reforms in the draft regulation amending Chapter I, Building, of the Construction Code, though nothing rising to the level of a gamechanger. Poor residential building code score.
Saskatchewan	D	Saskatchewan, which had been one of the top performers, has reversed course.
Newfoundland and Labrador	D	No significant regulatory changes found, and poor residential building code score.
Manitoba	D	No significant regulatory changes found, and poor residential building code score.

BETTER BUILDING CODES: WHY IT MATTERS

The Blueprint emphasizes that achieving all four of its goals—affordability, climate resilience, productivity, and equity—requires attention not just to where we build, but ***what we build***.

WHAT WE BUILD: *The form of a building, the materials used, and the design requirements all affect a home's construction and operating costs, its resilience to extreme weather events, its carbon footprint, and our ability to build at scale. Our Blueprint calls on governments to adopt the highest tiers of the National Model Building Codes while also urgently revising those codes to incorporate climate resilience features and to legalize more efficient use of building space.*

Building code reform is particularly important. The Efficiency Canada report, Building for Tomorrow, commissioned by the Task Force for Housing and Climate, highlights the importance of the building code in both driving emissions reductions and improving affordability. The report finds that adopting the highest tiers of the 2020 National Building Code (NBC) and National Energy Code for Buildings (NECB) could cut lower emissions by 3 megatonnes annually, and lower household costs by $3 billion per year.

Even so, adopting the highest code tiers will not be enough. Existing building code provisions prohibit building the kinds of small apartments that are popular across Europe, particularly in climates similar to Canada. Legalizing European-style single-egress apartments would allow for larger, more family-friendly units in neighbourhoods with active transportation options, close to amenities. This would provide further affordability and carbon reduction benefits through increased housing supply.

BETTER BUILDING CODES: KEY POLICY ACTIONS

The Blueprint recommends several policy actions involving the building code, but by far III.4 in the provincial Blueprint is the most important:

> ***III.4 Adopt the highest tiers of the National Model Building Code while revising building codes to support repeatable design, adopt Sweden's single-egress rules for buildings up to 16 storeys, and remove any floorplate restrictions to allow larger, more efficient high-density towers.***

Among all the criteria in this report, building code reform may be the most straightforward. Provinces can:

- **Adopt the upper tiers of the NBC and NECB;**
- **Permit single-egress buildings to support European-style apartment formats;**
- **Encourage repeatable designs for faster, cheaper construction;**
- **Eliminate unnecessary floorplate restrictions to enable more efficient high-density buildings.**

BETTER BUILDING CODES: CURRENT STATE OF PLAY

Efficiency Canada's Policy Tracking System is invaluable for tracking provincial adoption of NBC (low-rise)and the NECB (mid- and high-rise) standards. Notable developments include:

- **British Columbia** is the national leader. Its building code aligns with **Tier 3**, with clear targets for achieving *net-zero energy* ready and net-zero emissions construction.
- **Nova Scotia** has committed to adopting Tier 2 by 2026 and Tier 3 by 2027.
- **Prince Edward Island** has committed to a net-zero energy ready building code by 2030 as part of the province's Netzero Framework.
- **Saskatchewan,** which had committed to Tier 2 (and Tier 3 by 2025), reversed its decision in early 2025, reverting to Tier 1 and citing affordability concerns.

National Building Code – Current state of play

Province	Base code	Tier equivalency	Tier adoption dates	Net zero energy ready	Net zero emissions
British Columbia	BC ESC: Step 3	Tier 3	Step 4: 2027	2032	2030
Ontario	OBC 2024: SB12	Tier 2/3			
New Brunswick	NBC 2020	Tier 2		2030	
Nova Scotia	NBC 2020	Tier 1	Tier 2: 2026, Tier 3: 2027		
Prince Edward Island	NBC 2020	Tier 1		2030	
Alberta	NBC 2020	Tier 1			
Manitoba	NBC 2020	Tier 1			
Newfoundland and Labrador	NBC 2020	Tier 1			
Québec	QCC: NBC 2015	Tier 1			
Saskatchewan	NBC 2020	Tier 1			

British Columbia is the leader in adopting higher tiers of the National Building Code. Their code is currently equivalent to Tier 3, and they have set target dates for net-zero energy readiness and emissions compliance.

Not surprisingly, the list of provinces that have adopted more ambitious provisions of the National Energy Code for Buildings mirrors that of the NBC list, with British Columbia, New Brunswick, and Nova Scotia standing out.

National Energy Code for Buildings – current state of play

Province	Base code	Tier equivalency	Tier adoption dates	Net zero energy ready	Net zero emissions
New Brunswick	NECB 2020	Tier 2		2030	
British Columbia	BC ESC: Step 2	Tier 1/2	Step 4: 2027	2032	2030
Nova Scotia	NECB 2020	Tier 1	Tier 2: 2027, Tier 3: 2029		
Alberta	NECB 2020	Tier 1			
Manitoba	NECB 2020	Tier 1			
Prince Edward Island	NECB 2020	Tier 1			
Saskatchewan	NECB 2020	Tier 1			
Ontario	OBC 2024: SB10				
Québec	QCC: NECB 2015				
Newfoundland and Labrador	None				

Single-egress reforms – current developments

When it comes to single-egress reforms, two governments in Canada are leading the way:

British Columbia: In August 2024, British Columbia became the first jurisdiction in Canada to legalize single 6-storey (or fewer) single-egress apartment buildings. A number of fire safety measures must be put into place, such as a maximum of 24 occupants per floor and automated sprinkler systems. These changes do not apply in Vancouver, as the city is permitted to have a separate building code. However, Vancouver is examining the change, as are cities such as Edmonton and Toronto.

Federal: In September 2024, the National Research Council of Canada launched consultations to study single-egress design in residential buildings. The consultations specifically refer to reforms under consideration in British Columbia. On March 20th, 2025, the National Research Council Canada published their report on the consultations.

There has been little activity at the provincial level outside of British Columbia, though several municipalities are examining the issue.

CRITERION 3

FACTORY-BUILT HOUSING

FACTORY-BUILT HOUSING: GRADES

Government	Grade	Comments
Federal	A-	The federal government is making some large bets on housing innovation, but jurisdictional limitations require additional support from provincial and municipal governments.
British Columbia	B+	British Columbia has a number of funds that help accelerate housing innovation. Increasing these in size and ambition could greatly accelerate the sector.
Québec	B	Under the Housing Accelerator Fund's Canada-Quebec agreement, the two governments have committed to the purchase of 500 prefabricated housing units, which will both provide housing and help accelerate Quebec's factory-built housing industry.
Prince Edward Island	C+	"Grow modular construction" and "Support construction industry with innovation" are listed as priorities under the Acceleration stream of the province's Building Together housing plan.
New Brunswick	C	The province's Housing For All strategy identifies modular housing as a priority and has committed to launching a "public awareness campaign to promote modular homes". The province has made joint investments with the federal government, such as a $2.5 million investment in Ironwood Manufactured Homes.
Ontario	C	In 2024, the Ontario government identified modular homebuilding as a priority and conducted industry consultations. During the 2025 election campaign, the Progressive Conservatives committed to a $50 million fund to accelerate housing innovation.
Manitoba	D	There are a number of innovative factory-built home companies in Canada, and the provincial government has made very modest reforms to reduce red tape in the Buildings Act. The provincial government should look to reforms in provinces such as British Columbia and Quebec to accelerate housing innovation.
Alberta	D-	In October 2024, the provincial government released an information brief on the benefits of housing manufacturing. Otherwise no significant recent reforms to accelerate factory-built housing.
Nova Scotia	F	Nova Scotia's Five Year Housing Plan makes a brief reference to addressing "labour issues through manufacturing process improvements and use of robotics." No significant recent reforms to accelerate factory-built housing.
Newfoundland and Labrador	F	No significant recent reforms to accelerate factory-built housing.
Saskatchewan	F	No significant recent reforms to accelerate factory-built housing.

FACTORY-BUILT HOUSING: WHY IT MATTERS

Canada's approach to homebuilding has remained largely unchanged for decades. Unlike the automotive sector, which has seen massive productivity gains due to new technologies and manufacturing methods, homebuilding productivity has stagnated or even declined. The CMHC reports that 650,000 workers were employed building homes in 2023, a record number, but the number of housing starts is essentially unchanged over the last several decades. Mathieu Laberge of the CMHC estimates Canada could be building an additional 130,000 and 225,000 homes each year, had productivity levels not decreased.

Canada must solve the productivity crisis in homebuilding. One way we can achieve that is through adopting new technologies, including factory-built approaches such as panelization and pre-fabricated homes. Changing ***how we build*** was identified as one of the five key factors by the Task Force.

HOW WE BUILD: *We're not going to achieve our housing goals by continuing to build homes the same way we've built them for the past one hundred years. That's why we call on governments to increase productivity, speed up building times, and deliver crucial climate benefits by increasing factory-built housing, accelerating innovations in better building materials like mass timber and low-carbon concrete, and re-balancing immigration strategies to cultivate and attract skilled labour.*

Transforming how we build will require collaboration between all orders of government, industry, labour, and the higher education sector. In late 2023, a group of real estate sector innovators came together to craft the 2024 Innovation Agenda for Canadian Real Estate. They identified five critical priorities for accelerating innovation in housing construction and the broader real-estate space:

1. **Leadership and Institutions**: Canadian institutions, including government, not-for-profits, or the private sector, lack a culture of risk-taking and willingness to lead in driving innovation in Canada.
2. **Affordability and Supply**: Meeting Canada's housing supply challenge and addressing high costs and low productivity leading to a lack of affordability, recognizing that homes will only get built if the project economics works.
3. **Climate Resiliency and Low Carbon**: Ensuring Canadian real estate can withstand extreme weather events and reducing the carbon footprint of Canadian real estate to meet Canada's 2030 climate goals.
4. **Optimization**: Canada's existing building stock is not used optimally due to factors such as a lack of transition options and a lack of flexibility to convert one form of building use to another.
5. **Capital, Labour and Supporting Infrastructure**: Ensuring firms have the essential building blocks for success.

The Blueprint incorporates a number of policy recommendations aimed at advancing innovation in housing construction It is important to note that the housing innovators cited not just increased productivity as a benefit of housing-related innovation, but also that enhanced innovation can lead to enhanced affordability, resiliency, and reduced emissions.

FACTORY-BUILT HOUSING: KEY POLICY ACTIONS

Drawing on the innovation policy framework from ***Clean Innovation*** by Smart Prosperity, the Task Force emphasized the importance of four types of policies to support housing innovation:

- **Push** policies to drive new ideas
- **Pull** policies to stimulate market demand
- **Strengthen** policies to make the innovation ecosystem more resilient
- **Grow** policies to scale promising ideas into market-ready solutions

Given the current state of Canada's homebuilding sector, the Blueprint for More and Better Housing identified two urgent priorities:

1. Grow policies, especially financing tools to help innovative companies scale.
2. Pull policies, such as government procurement, to help firms scale through learning-by-doing.

The most important—and most urgent—recommendation in the Blueprint's provincial innovation section is:

> ***VII. 1 Create an investment fund to help innovative companies in modular housing, mass timber, panelization, and other housing technologies reach scale and create a housing innovation fund to facilitate new solutions and share best practices.***

Unfortunately, there has been limited adoption of these innovation-focused policy tools…

Criterion 3

FACTORY-BUILT HOUSING: CURRENT STATE OF PLAY

Two governments stand out when it comes to investing in factory-built approaches.

Federal government: In April 2024, the federal government released their Solving the Housing Crisis plan, which puts a strong emphasis on innovation. Key policy planks include:

- Homebuilding Technology and Innovation Fund — operated by Next Generation Manufacturing Canada (NGen), this $50 million fund aims to scale up homebuilding innovations. It is expected to leverage an additional $150 million in investment from industry and provinces. On March 21, 2025 NGen announced that they had invested $33 million, and "spurred" an additional $62 million in investment in 12 projects involving 33 organizations. These included projects in mass timber, modular housing, and robotics.

- Industrial housing strategy consultation – Announced on August 19, 2024, this national consultation is being led by five experts in homebuilding innovation. The results have not yet been made public.

- Apartment Construction Loan Program — Includes a $500 million commitment for low-cost financing of new apartment construction using prefabricated or innovative homebuilding techniques.

Quebec: The province is home to notable innovations in student housing. Student housing developer UTILE is building a 155-unit midrise student housing complex in Rimouski. The $30 million project has received funding from both the federal and provincial governments and is part of the Government of Quebec's focus on accelerating housing innovation in the province.

British Columbia: The province has a number of programs to accelerate innovation in homebuilding. These include:

- CleanBC Building Innovation Fund which provides incentives for companies manufacturing new energy efficient and low-carbon building technologies.

- BC Manufacturing Jobs Fund has provided funding to a number of innovative companies in the housing manufacturing space, including in mass timber construction.

- Mass Timber Demonstration Program provides funding to accelerate the adoption of novel mass timber-based building approaches.

Other governments are considering developing housing innovation funds. The most notable is Ontario, which has committed to a $50 million housing innovation fund, though it has yet to be launched.

CRITERION 4

AVOID HIGH RISK AREAS

AVOID HIGH RISK AREAS: GRADES

Government	Grade	Comments
Saskatchewan	A	The province has strict rules on building in areas prone to flooding.
Ontario	A	Ontario has some of the strongest regulations in Canada to prevent building in areas prone to flooding. Overall strong regulations. However, a 2022 report by Ontario's Auditor General and a 2024 follow-up identified significant gaps in "coordinating and managing urban flooding".
Quebec	B+	Quebec has some of the strongest prohibitions against building in flood-prone areas. In June 2024, the province published draft regulations that expand areas subject to flood protection by 30 to 40%.
Newfoundland and Labrador	B-	The province has relatively strict policies on building in areas prone to flooding, and has up-to-date flood maps publicly available.
Federal	C+	The federal government has committed to investing $164.2 million in the Flood Hazard Identification and Mapping Program from 2024 to 2028, a significant increase from the $63.8 million invested between 2021 to 2024. However, a full Nationwide Hazard Mapping Initiative is needed to map all weather-related hazards across the country.
Manitoba	C	The province does have some restrictions on building on areas prone to flooding.
New Brunswick	C	New Brunswick has made flood maps available that incorporate the effects of climate change through the year 2100.
Nova Scotia	C	Nova Scotia has strong restrictions on building in areas prone to river flooding, and has interactive tools to illustrate the impacts of climate change on coastal communities and homes. However, the province's decision not to pass the Coastal Protection Act is a significant step backward.
Prince Edward Island	C	The CHRIS tool is quite helpful, but prohibitions on building in areas prone to flooding must be made stronger.
Alberta	D	Revised maps are helpful, but provincial leadership is required to ensure homes are not built in areas prone to extreme weather events.
British Columbia	D	British Columbia lags the rest of the country when it comes to ensuring homes are not built in areas prone to flooding and wildfire.

AVOID HIGH RISK AREAS: WHY IT MATTERS

It is becoming an often-repeated phrase associated with climate and housing: "The most expensive home is the one you need to rebuild after an extreme weather event." Canada's housing shortage is increasing pressure to build on lands prone to flooding, wildfires, and other climate-related hazards. While the temptation to build on any land available is understandable given the crisis, we can meet our housing needs through construction on safer land and through gentle intensification in already developed areas.

The Insurance Board of Canada reports that in 2024, insurers paid out over $8 billion in losses due to extreme weather events, and insured and uninsured losses to homeowners, businesses, and governments reached nearly $20 billion. These costs are eight times higher than they were just five years ago.

Improving affordability means reducing these growing climate-related costs. But this need not come at the expense of supply. The Canadian Climate Institute's Close to Home report makes the case that we can both increase supply and increase resiliency. The report advocates a prohibition on building in high-flood risk areas, and that moderate-flood risk areas require adequate structural flood risk protection architecture if they are to be built on. The report notes that redirecting housing construction away from high-risk flood zones would only represent 3% of planned housing construction, but reduce flood risk to new housing by 80%. The loss of these lands to development, while real, are modest enough to be made up for in other ways.

AVOID HIGH RISK AREAS: KEY POLICY ACTIONS

Avoiding development in high-risk zones starts with knowing where those zones are. The federal and provincial sections of the Blueprint make hazard mapping a priority.

- **Key federal Blueprint recommendation:** IX.4.i Implementing a Nationwide Hazard Mapping Initiative. Instruct relevant federal and provincial agencies to collaborate on developing detailed hazard maps, focusing on areas prone to natural disasters, environmental risks, and urban congestion. These maps should be made publicly available and updated annually to aid in informed policymaking.
- **Key provincial Blueprint recommendation:** IX.1 Publish and make publicly accessible regularly updated climate hazard and risk maps, including for coastal, river, urban and groundwater flooding; wildfires; high winds; and hail.

However, mapping alone is not enough. Strong policies must follow to:

- Restrict building in high-risk zones
- Prevent insurance programs from creating moral hazard incentivizing development in unsafe areas and shielding builders from risk

That said, mapping remains the foundational first step, so it is identified as our key policy action.

AVOID HIGH RISK AREAS: CURRENT STATE OF PLAY

The *Close to Home* report offers a provincial and territorial breakdown of land-use policies related to climate risk:

- **Ontario and Quebec** are noted for having relatively **strong restrictions** against building in flood-prone areas.
- **British Columbia and Alberta**, by contrast, have **fewer regulatory protections**.
- **Newfoundland and Labrador** stands out as the **only province** that explicitly incorporates the **anticipated impacts of climate change** into the determination of flood hazard zones.

Overview of Provincial and Territorial Land use Policy for Flood Hazard Zones

Canadian Climate Institute, Close to Home

	Riverine flooding hazard policy					Coastal flooding hazard policy
	Authority to regulate development in flood hazard zones	Binding flood hazard regulation or policy for land use	Non-binding guidance	Hazard zone where regulation or policy prohibits development	Hazard zone where regulation or policy requires development be floodproofed	Legally binding regulation or policy
Nova Scotia	Provincial + Municipal	Yes	-	1:20-year flood in five designated floodplains	1:100-year flood in designated and other known floodplains	No
Ontario	Provincial + Municipal	Yes	-	1:100-year or Regional Storm flood	Special Policy Areas, two-zone study areas	No
Saskatchewan	Provincial + Municipal	Yes	-	1:500-year floodway	1:500-year flood	n/a
Manitoba	Provincial + Municipal	Yes	-	None	1:100-year flood for Winnipeg and other designated zones	No
New Brunswick	Provincial + Municipal	Yes	-	None	None	Yes, but no prohibition zone
Alberta	Provincial + Municipal	No	No	None	None	n/a
Prince Edward Island	Provincial + Municipal	No	No	None	None	No
British Columbia	Municipal	No	Yes	None	None	No
Nunavut	Municipal	No	No	None	None	No
Yukon	Municipal	No	No	None	None	No
Northwest Territories	Municipal	No	No	n/a	n/a	No
Newfoundland and Labrador	Provincial	Yes	-	1:20-year flood	1:100-year flood in designated floodplains	Yes, same standard as riverine flooding
Quebec	Provincial	Yes	-	1:20-year flood	1:100-year flood	Yes, same standard as riverine flooding

When it comes to hazard mapping, there has been some progress made recently. Some notable development include the following:

- **Federal:** The federal government has increased funding to their Flood Hazard Identification and Mapping Program to provide better flood mapping at the community level.
- **Alberta:** In January 2024, the province released updated flood hazard maps for the province. However, the use of these maps in planning decisions is left to the discretion of individual municipalities.
- **Prince Edward Island:** In April 2024, the province released CHRIS, the Climate Hazard and Risk Information System, an interactive tool that shows areas at risk of coastal or inland flooding.

However, there is much more to be done. In particular, federal leadership is needed on a full Nationwide Hazard Mapping Initiative.

CRITERION 5

FILL-IN MARKET GAPS

FILL-IN MARKET GAPS: GRADES

Prince Edward Island receives our top grade in this section, due to a combination of improved core housing needs metrics and recent policy reforms. While British Columbia has enacted an above-average number of reforms, their poor grade reflects chronically high rents and the highest levels of core housing need in the country.

Government	Grade	Comments
Prince Edward Island	A	Despite already having among the lowest core housing need in Canada, the province has released a comprehensive housing plan to make further progress.
Federal	B+	The federal government has been very active on the file, though implementation issues persist.
Québec	B	Low and dropping core housing need. The province has a robust series of programs aimed at housing affordability, though few new initiatives in recent years.
Newfoundland and Labrador	B	Rents are still relatively affordable by Canadian standards, and the province is making a good faith effort to fill in market gaps.
Manitoba	B-	The province is responding to rising core housing need in the province through policy, such as the Affordable Homes Program and the Your Way Home Plan but more work needs to be done.
New Brunswick	C+	Large rise in core housing need, as rents have increased through post-pandemic migration from Ontario. Housing for All plan may need strengthening given this level of growth.
Saskatchewan	C+	Among the lowest rents in Canada. Core housing need fell in 2022, but still higher than in many provinces. Not much activity in recent years on non-market or below-market housing.
Alberta	C	Market rents and core housing need lower than in British Columbia and Ontario, though increases in core housing needs are a concern.
British Columbia	D+	Rents and core housing need is the highest in the country. The province has enacted a number of policies to create affordable housing.
Nova Scotia	D	Rents and core housing need rose substantially in the post-pandemic period, thanks to an influx of new residents, particularly from Ontario. Provincial policy is inadequate to meet the growing need.
Ontario	D-	The province has not prioritized non-market housing, and core housing need and rents remain among the highest in the country. However, the province is currently experiencing some rent relief due to a decrease in the number of international students, which has significantly reduced rent demand.

FILL-IN MARKET GAPS: WHY IT MATTERS

Criterion 5 focuses primarily, but not exclusively, on the Task Force's affordability goal of reducing core housing need to zero by 2031. A household is considered in ***core housing need*** when its housing fails one or more of the following tests:

- **Adequate:** Residents report that their homes do not require any major repairs.
- **Affordable:** Shelter costs equal to less than 30% of total before-tax household income.
- **Suitable:** Home has enough bedrooms for the household size and composition according to the National Occupancy Standard (NOS).

Core housing need is a central metric in the federal government's implementation of housing as a human right. It is also the Task Force's primary measure of progress on housing affordability. Importantly, core housing need is linked not only to affordability but also to resiliency: housing that is damaged or made uninhabitable by extreme weather events becomes inadequate, exacerbating core housing need.

In September 2024, CMHC released new core housing need data for 2022. The data shows:

- British Columbia and Ontario have the highest proportions of households in core housing need.
- Comparing 2022 to 2018, there is a slight increase nationally, with sharp rises in Nova Scotia and New Brunswick, partially offset by declines in Newfoundland and Labrador, Prince Edward Island, and Quebec.

However, there are limitations to the core housing need metric. It does not account for certain groups, such as full-time students or people experiencing homelessness. As a result, it may understate the true scale of housing challenges across Canada.

Core Housing need by jurisdiction – 2018 and 2022

Jurisdiction	2018	2022	Change
British Columbia	14.8%	16.0%	1.2%
Ontario	13.4%	14.5%	1.1%
Nova Scotia	11.0%	12.9%	1.9%
Manitoba	10.9%	12.0%	1.1%
Alberta	10.2%	11.3%	1.1%
Saskatchewan	11.7%	9.5%	-2.2%
Newfoundland and Labrador	8.9%	9.4%	0.5%
New Brunswick	7.3%	9.2%	1.9%
Prince Edward Island	8.9%	6.5%	-2.4%
Québec	7.2%	5.5%	-1.7%
Canada (provinces only)	11.3%	11.6%	0.3%

Both the 2018 and 2022 data predate the release of the Blueprint, so other indicators are needed to track recent progress. The April 2025 rental report from Rentals.ca examines rent increases on new leases between March 2024 and March 2025 at the provincial level. While the report does not break down data by individual provinces, it shows that, on average, **rents across Canada have declined** over the past year. These declines are primarily due to decreases in rental demand, rather than increases in rental supply, from changes in immigration and non-permanent resident policies. There are markets, however, where rents continue to rise, such as Atlantic Canada.

March 2025 average rent by province and year-over-year change

Jurisdiction	Average Rent	Change from Previous Year
British Columbia	$2,480	-0.6%
Ontario	$2,327	-3.5%
Atlantic Canada	$2,093	8.0%
Québec	$1,949	-2.5%
Alberta	$1,721	-0.4%
Manitoba	$1,592	2.0%
Saskatchewan	$1,336	3.0%
Canada	$2,101	-1.9%

We should note that these figures are only averages, and do not adequately capture the number of apartments that are available under a particular availability threshold. Nor does it consider where the apartments are located and the availability of active mobility options. As the report Four Pathways to Housing Affordability showed, overall housing affordability is not just determined by rents, but is also a function of transportation costs associated with the location of the home.

The Task Force recognized that the market alone will not be able to reduce core housing need to zero. There will always be individuals and families who will be priced out of market rate housing, no matter how low market rents are driven down. The ***Why We Build*** section of the Blueprint makes it clear that a variety of approaches are needed:

WHY WE BUILD: Remembering that everyone in Canada has the right to live somewhere in security, peace and dignity is fundamental for building the kinds of homes Canada needs. Governments, not-for-profits and the private sector all have a role to play in driving a historic surge in our supply of affordable, attainable, and non-market and below-market housing, both through new construction as well as through innovative acquisition approaches.

This recognition underpins Criterion 5: Fill in Market Gaps—the need for governments to ensure access to non-market and below-market housing options for those who cannot be served by the market alone.

FILL-IN MARKET GAPS: KEY POLICY ACTIONS

Policy actions to facilitate the construction of non-market and below-market housing are spread throughout the Blueprint for all three orders of government. Recommendation VIII of the Blueprint speaks directly to the issue:

> *Government policies should seek to create housing affordability across the housing spectrum through partnerships with homebuilders, not-for-profits and financial institutions, and through the use of government owned-land. Census 2021 found that over 3 million households are in unaffordable housing in Canada. The government should seek to get this figure as close to zero as possible in the 2031 Census.*

The Blueprint then gives eight specific actions to the federal government, seven to the provinces, and six to municipalities. Those policy actions include tax reforms, long-term low-interest financing, capacity building, increases to social assistance, and the use of government-owned land to build homes. Notably, the Blueprint advocates for leasing, rather than selling, public land, which gives governments more control over the types of homes that are built and allows governments to benefit from rising land values.

FILL-IN MARKET GAPS: CURRENT STATE OF PLAY

Several governments have recently taken steps to expand affordable housing. Below are selected examples of policy actions initiated around or after the Blueprint's release:

The **Federal Government** has launched a suite of new funding tools and reforms to accelerate the development of low-cost rental housing, and:

- In 2024, launched the **Canada Public Land Bank** as part of the Public Lands for Homes Plan, aligning with Blueprint Recommendation IV.3 to lease public land for apartment construction.
- **Budget 2024** implemented additional Blueprint measures, including raising the capital cost allowance for new apartment construction from 4% to 10% (Blueprint Recommendation VI.3.i).

Alberta:

- Bill 20 (2025), Alberta's Municipal Affairs Statutes Amendment Act, enhances tax exemptions for affordable housing and empowers municipalities to offer additional exemptions.
- However, a 2024 Auditor General report identified serious gaps in the province's tracking of the state of repair of its 27,000 government-owned units.

British Columbia:

- Bill 16, the ***Housing Statutes Amendment Act***, provides local governments with enhanced inclusionary zoning and bonus density tools to secure affordable housing, though there are concerns that the use of these tools could cause market rents to rise.
- Expanded funding in the 2024 budget for **BC Builds**, a program leveraging public land, grants, and low-cost financing to build affordable rental units.

Manitoba:

- Launched Your Way Home in January 2025, aiming to end chronic homelessness by 2031.
- In the 2024 budget, the province Introduced the Rental Housing Construction Tax Credit, offering $8,500 per unit—boosted to $13,500 if the unit is designated as affordable, and maintains that designation for a minimum of 10 years.

New Brunswick:

- Released a 10-year Housing for All plan in June 2023, emphasizing public land use and setting affordability targets.

Newfoundland and Labrador:

- Introduced the Rental Housing Development Loan Program in January 2024 to provide low-interest loans for apartment development.

Nova Scotia:

- In fall 2024, launched the Community Housing Capital Fund (NS-CHCF) with $3.5 million to preserve and improve community housing.

Ontario:

- While the province does not prioritize non-market housing, it did match the federal GST cut on purpose-built rental construction.

Prince Edward Island:

- Rolled out the Building Together strategy in February 2024—a five-year plan focused on housing supply growth, affordability, and vulnerable populations.

Québec:

- Passed Bill 57 in 2024, which "grants local municipalities the power to adopt a differentiated zoning by-law. The Act allows such municipalities to require, under an agreement concerning incentive zoning, payment of a sum of money intended for the implementation of an affordable, social or family housing program."
- These actions inform the grades assigned for Criterion 5 and highlight a growing—if uneven—commitment to bridging market gaps across the country.

REPORT CARD ON MORE AND BETTER HOUSING

FINAL THOUGHTS AND PRIORITY ACTIONS FOR EACH GOVERNMENT

Canada remains in the midst of a housing crisis. The federal government has instituted several policy reforms in the previous year to help address this crisis, many taken directly from, or inspired by, the Blueprint for More and Better Housing. These include tax reforms such as increasing the capital cost allowance for apartment construction, enhanced access to construction financing, and a fund to accelerate housing innovation. However, the federal government has only limited direct authority over housing, and therefore must rely on incentives to drive change at the municipal level.

Municipalities across the country have responded by advancing a number of Blueprint-aligned reforms, including enabling as-of-right density near transit stations and eliminating or reducing parking minimums. In contrast, the provinces have lagged well behind, though there have been bright spots, such as British Columbia legalizing six-storey single egress apartment construction.

Provinces and municipalities must make it easier to build forms of "missing middle" type housing, such as fourplexes and small apartment buildings, making building code and zoning reform essential, particularly to ensure the construction of more family-sized units with three or more bedrooms, in line with Canada's commitment to housing as a human right. As the Mid-Rise Manual puts it, for these homes to be built, they must be "legal, practical and cost-effective to build". In many provinces, they are practical and cost-effective, but not legal. In British Columbia, they are becoming more legal, but high development charges and slow approval times make them neither practical nor cost-effective. In Ontario, with the slowest approval times in Canada, restrictive zoning, and the highest development charges in Canada, they meet none of the conditions of "legal, practical and cost-effective to build". This must change.

Some provinces are performing better than others, but all have room for improvement. The key policy actions from the five criteria should be considered priority actions for every province.

Priority Actions for All Provinces

Legalize housing variety: Abolish parking minimums, unit maximums, and limit exclusionary zoning in municipalities through binding provincial action to allow "as of right" residential housing. (Blueprint Recommendation I.1)

Simplify land use regulation: Create a more permissive land use, planning, and approvals system, including establishing province-wide zoning standards, or prohibitions, for minimum lot sizes, maximum building setbacks, minimum heights, angular planes, shadow rules, front doors, building depth, landscaping, floor space index, and heritage view cones and planes. (Recommendation V.1.iii)

Modernize building codes: Adopt the highest tiers of the National Model Building Code while revising building codes to support repeatable design, adopt Sweden's single-egress rules for buildings up to 16 storeys, and remove any floorplate restrictions to allow larger, more efficient high-density towers. (Recommendation III.4)

Invest in innovation: Create an investment fund to help innovative companies in modular housing, mass timber, panelization, and other housing technologies reach scale and create a housing innovation fund to facilitate new solutions and share best practices. (Recommendation VII.1)

Map climate risks: Publish and make publicly accessible regularly updated climate hazard and risk maps, including for coastal, river, urban and groundwater flooding; wildfires; high winds; and hail. (Recommendation IX.1)

Fill market gaps: Government policies should seek to create housing affordability across the housing spectrum through partnerships with homebuilders, not-for-profits and financial institutions, and through the use of government owned-land. With over 3 million Canadian households in unaffordable housing according to the 2021 Census, governments must aim to bring that number as close to zero as possible by 2031. (Recommendation VIII)

However, some challenges are unique to each province and the federal government. We have listed a set of priority policy actions tailored to each of the 11 governments.

We encourage governments to approach these recommendations—and their corresponding grades—with the spirit of urgency and collaboration they are intended to inspire. Canada's housing crisis is serious, but not unsolvable. We know how to fix the problem; we now need governments across Canada to execute.

Government	Overall Grade	Recommended Priorities
Federal	B	Continue to tie federal funding to reforms at the provincial and municipal levels. Institute enhanced enforcement, transparency, and auditing of programs such as the National Housing Accelerator. Continue to build on reforms to accelerate housing innovation and modernizing housing construction taxation. Implement Nationwide Hazard Mapping Initiative and ensure its use by provincial and municipal governments.
Québec	C+	Quebec has the lowest core housing need in Canada, a testament to the strength of provincial and municipal housing policies. Ensuring homes are not built on floodplains and in areas prone to wildfires must be a priority.
Prince Edward Island	C+	Prince Edward Island punches above its weight when it comes to housing policy. Continue to build on these strengths and increase ambition regarding building codes and resiliency.
British Columbia	C+	Substantial reforms are needed to address Canada's highest development charges and slowest approval speeds. Municipalities must also adopt best practices, like those in Edmonton.
New Brunswick	C	New Brunswick has strengths in factory-built housing approaches. Build on those. Work on zoning reforms to allow for more gentle, family-friendly density.
Ontario	C-	Substantial reforms are needed to address Canada's highest development charges and slowest approval speeds. Municipalities must adopt best practices, like those in Edmonton, when it comes to approval processes. Implement the promised $50 million housing innovation fund. Single-egress apartments, which are desperately needed in the GTA, must be legalized.
Saskatchewan	C-	With low rents and home prices and a booming economy, Saskatchewan has an opportunity to attract young talent from other provinces. Policies to allow for child-friendly density with high-quality amenities can facilitate this.
Nova Scotia	C-	Nova Scotia's high core housing need should be a top concern for policymakers. Increase focus on non-market and below-market housing solutions. Work on instituting single-egress apartment construction and limiting exclusionary zoning.
Newfoundland and Labrador	C-	Adopt higher tiers of the building code and institute an innovation strategy for homebuilding that is suitable to the province's economic and climate conditions.
Manitoba	D+	Rents are rising in Manitoba, and core housing need is increasing. Institute a comprehensive housing plan that addresses housing innovation, adopts higher tiers of the building code, legalizes single-egress apartments, and ensures homes are not built in areas prone to flooding.
Alberta	D+	Calgary and Edmonton have taken leadership and instituted several helpful reforms on issues ranging from zoning to approval processes. Work on adopting these province-wide. Institute hazard mapping reforms and ensure homes are not built in areas prone to floods and wildfires.

REPORT CARD ON MORE AND BETTER HOUSING

APPENDIX A

BLUEPRINT RECOMMENDATIONS ADOPTED TO DATE

Since the publication of the ***Blueprint for More and Better Housing*** in March 2024, governments across Canada have begun to adopt some of the ***Blueprint***'s recommendations, though progress has been uneven.

The federal government has made the most progress in aligning its housing policies with the Blueprint. Under the Solving the Housing Crisis: Canada's Housing Plan, the federal government introduced a range of reforms—many directly drawn from or inspired by the Blueprint. These reforms primarily target taxation, financing, and municipal incentives.

Below is a summary of major Blueprint-aligned federal policy actions since March 2024:

- Increased the Capital Cost Allowance for Apartments from 4% to 10%. (Recommendation VI.3.i of the Blueprint)
- Launched a new frequent builder stream in the Apartment Construction Loan Program (ACLP) to fast-track the application process for proven home builders. (Recommendation VI.2.v of the Blueprint)
- Created a land bank to coordinate public lands with preferential federal financing and other jurisdictional supports. (Recommendation IV.3 of the Blueprint)
- Leased public lands as opposed to selling them off, so public land stays public and affordable homes stay affordable. (Recommendation IV.3.i of the Blueprint)
- Allocated $20 million for Statistics Canada and CMHC to modernize and enhance the collection and dissemination of housing data, including municipal-level data on housing starts and completions. (Recommendation VI.1.iv of the Blueprint)
- Established the Canada Secondary Suite Loan Program, to be delivered by the Canada Mortgage and Housing Corporation, enabling homeowners to access up to $40,000 in low-interest loans to add a secondary suite to their homes. (Recommendation IV.5 of the Blueprint)
- Increased funding for First Nation, Inuit, and Métis communities, over and above the $5 billion allocated to Indigenous infrastructure in 2024-2025. (Recommendation IV.7 of the Blueprint)
- Established a "for Indigenous, by Indigenous" National Housing Centre that will provide additional distinctions-based investments for culturally appropriate Indigenous housing to be delivered by Indigenous governments, organizations, housing and service providers. (Recommendation IV.7 of the Blueprint)
- Added $400 million to the Housing Accelerator Fund, helping more municipalities fast-track home construction and invest in affordable housing. (Recommendation I.1 of the Blueprint)

- Created the Homebuilding Technology and Innovation Fund to help scale up, commercialize, and promote the adoption of innovative housing technologies and materials in Canada's homebuilding industry. (Recommendation VII.1 of the provincial Blueprint)

- Committed an additional $1 billion in the Affordable Housing Fund, which provides low-interest or forgivable loans and contributions for new and repaired affordable and community housing. (Recommendation VIII.4.i)

- Provided EIFEL (Excessive Interest and Financing Expenses Limitation) exceptions to purpose-built rental developers. (Recommendation VI.3.iii)

We have seen a few provincial reforms inspired by the Blueprint. These include:

- **British Columbia:** Legalized single-egress apartment buildings up to six storeys. (Recommendation III.4 of the Blueprint)

- **Nova Scotia:** Adopted higher tiers of the National Building Code. (Recommendation III.4 of the Blueprint)

- **Quebec:** Worked with the federal government under the Housing Accelerator Fund to accelerate Quebec's factory-built home sector through the purchase of prefabricated homes.

These three provincial reforms are not an exhaustive list; however, provincial reforms aligned with Blueprint recommendations have been relatively modest since its release in February 2024.

This report does not assess the performance of individual municipal governments; given that Canada contains over 5,000 municipalities, the task is beyond the scope of this report. That said, we have seen many municipalities enact Blueprint-inspired reforms, particularly around zoning and the abolition of parking minimums. Some of these reforms were requirements of federal or provincial housing programs, such as the Housing Accelerator; in other cases, municipalities enacted them due to local leadership.

Despite these promising developments, significant work remains to be done, particularly considering the lack of progress Canada is making on affordability and new housing supply.

Progress towards Blueprint goals

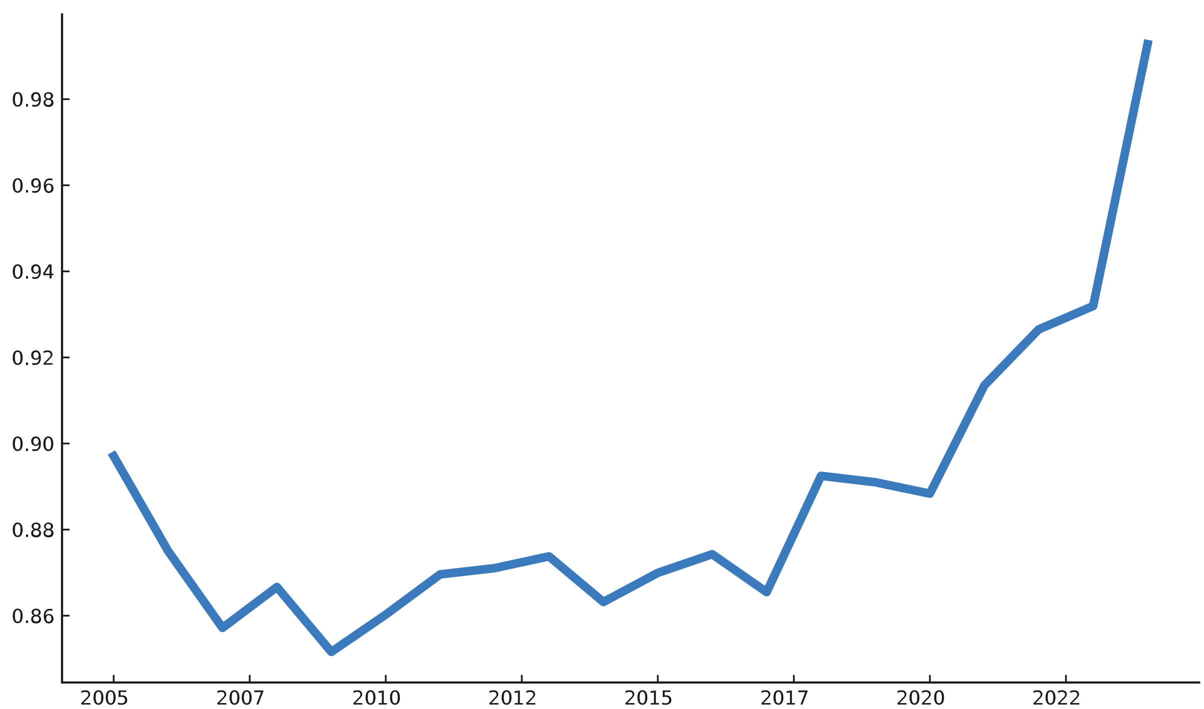
The Blueprint for More and Better Housing establishes four separate goals for Canada to achieve by the end of 2031. For the low-carbon and resiliency goals, no post-February 2024 data has been released since the Blueprint's publication, which prevents us from assessing whether Canada's housing stock is becoming more resilient or if Canada's housing emissions have decreased since then. We can, however, assess Canada's performance on affordability and supply.

Affordability: Renters struggle while homebuyers see some relief

The Blueprint calls for eliminating "the number of households spending more than 30% of their income on shelter costs by 2031". This metric is tracked through Census data, so a precise assessment will not be possible until the release of the 2026 Census. However, we can look at broader affordability trends, with the understanding that there are substantial differences across Canada depending on the location of the home, type of home, type of family and their income, and so on.

Housing affordability remains at crisis levels, particularly for renters. Since 2017, median rents have risen faster than median incomes across Canada[1]. In 2017, it took 0.87 weeks of pre-tax median earnings for a full-time worker to pay for the rent on a 2-bedroom apartment. By 2024, it took a full week of earnings, a 15% increase.

Weeks of Median Pre-Tax Full-Time Income Needed for Rent on a Median 2-Bedroom Apartment, Canada



1 This metric does not show how much any individual or family paid; it is a comparison of market-rents, on both existing and new leases, and market incomes. Rent data is from CMHC. Income data is from Statistics Canada's Labour Force Survey.

Our rental data incorporates both existing and new leasing. When looking solely at new leases, the outlook is somewhat more promising. According to Rentals.ca, in 2024 rents for condominiums fell by 5% and townhomes declined by 7%, while rents for apartments stayed relatively flat. Notably, rents have started to converge across the country, as high-rent provinces such as British Columbia and Ontario saw rents decline, while less expensive provinces, including Manitoba and Saskatchewan, experienced an increase in rents.

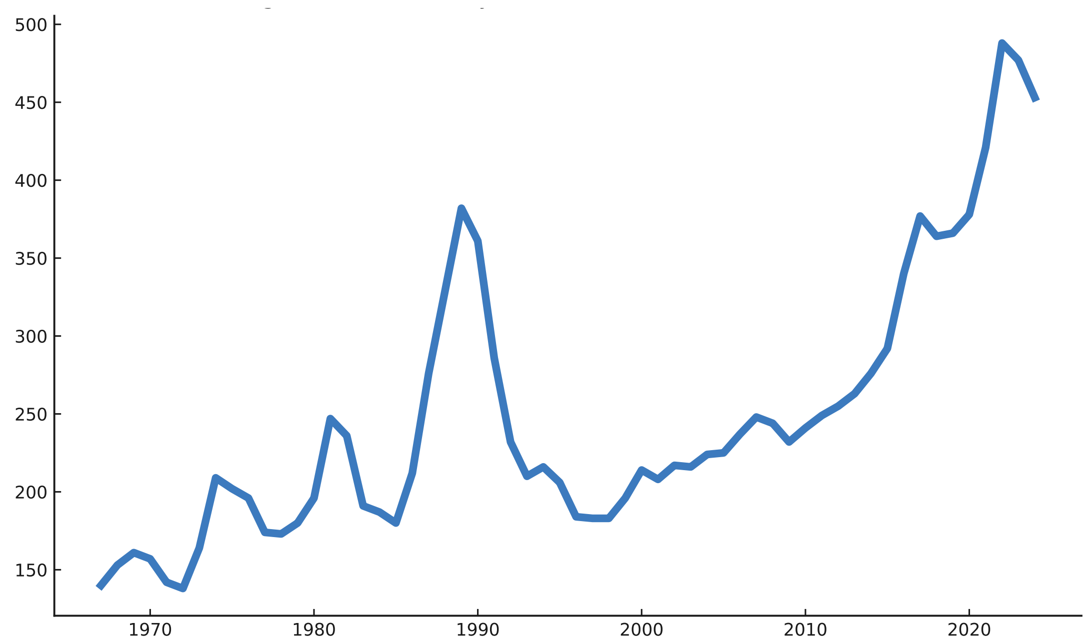
Homebuyers have seen some relief, as prices have been flat, if not falling, in some markets, and interest rates have declined from their 2023 peak, resulting in lower monthly payments for some new buyers. Across Canada, 20% down payments and the first five years of mortgage payments for a family-home are equivalent to 283 weeks worth of earnings for an individual full-time worker. While this is a significant improvement from the May 2023 peak of 353 weeks, it remains well above pre-pandemic levels[2]. Markets are considered affordable at levels under 150 weeks, so there is a long way to go to create affordability for Canadian homebuyers.

Weeks of Median Pre-Tax Income Needed for a 20% Downpayment and First 5 Years of Mortage Payments, Canada

Further details on affordability trends for homebuyers can be found in the Missing Middle Initiative reports Can Homes Become Affordable Without Prices Going Down?, When Did Middle-Class Housing Become Unaffordable?, and Southern Ontario's Home Affordability Crisis Remains at Near-Record Levels. The latter report shows that when taking into consideration, wage growth, mortgage-rate fluctuations, and home prices, homes have been less affordable in the post-pandemic period than at any time in recorded history (going back to 1967).

2 Details on the methodology can be found in the piece Introducing WHAM - The Weekly Housing Affordability Metric.

Weeks of Median Pre-Tax Income Needed for a 20% Downpayment and First 5 Years of Mortage Payments, GTA

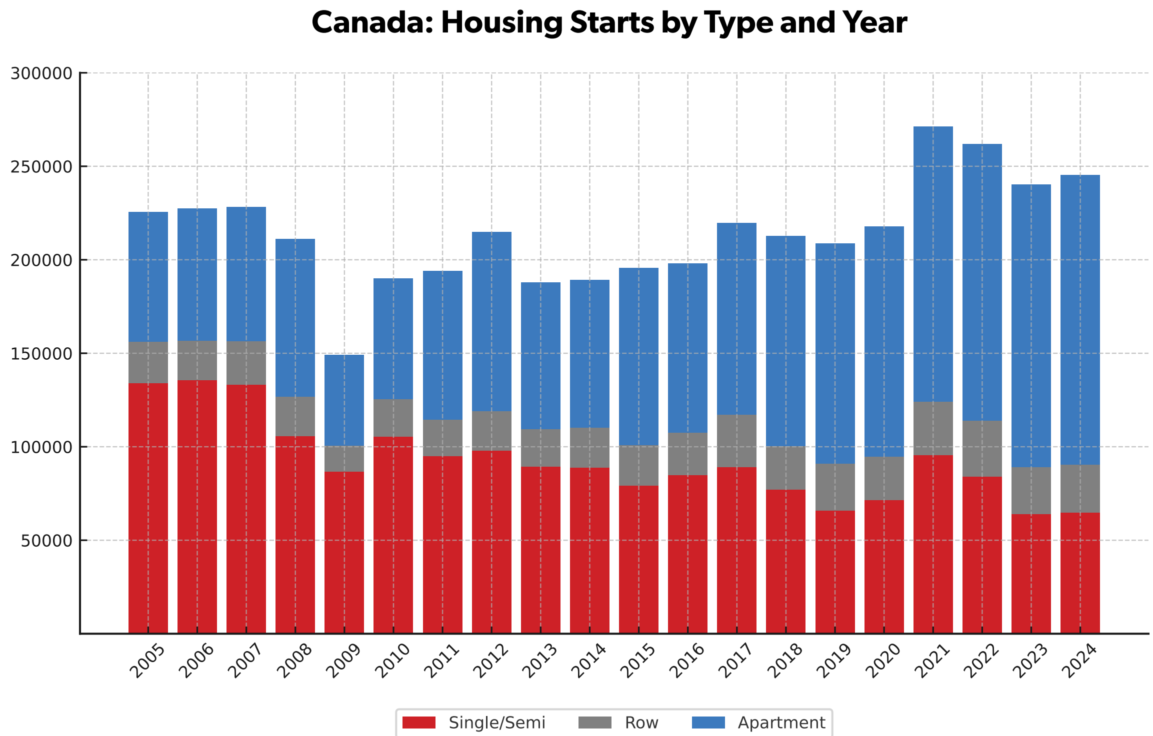


Housing starts need to double—instead, they are falling

The Blueprint set a goal of building 5.8 million homes between 2022 and 2031,over 600,000 homes per year. Achieving this would represent a near tripling of historic pace of homebuilding. While recent changes to immigration and non-permanent resident programs have slightly reduced projected demand, Canada still needs a significant increase in housing construction to meet long standing shortages and keep pace with future demand.

In 2021, housing starts in Canada reached 271,198 units, the highest levels recorded since 1976, though still less than half of the goal set by the Blueprint. Housing starts fell in each of 2022 and 2023. Starts rebounded slightly in 2024, increasing by 5,100 units to reach 245,367 total units[3]. Over 150,000 of these were apartment units, as there has been a dramatic shift over the last two decades from ground-oriented housing to apartments. Unfortunately, the current regulatory and tax environment makes it difficult to build apartment units large enough to house families with children. Fortunately, the Blueprint contains a series of policy recommendations designed to address these challenges to unlock the potential of family-sized, multi-unit housing.

3 Data found in Statistics Canada Table 34-10-0126-01.



Canada has a long way to go to meet the four goals set out in the Blueprint. With 2031 fast approaching, governments must act quickly to enact further reforms.

There is no one single fix to the housing crisis; it will take dozens of reforms spread across governments. The Blueprint recognized this and highlighted it as a necessary condition to solve the crisis:

FOUNDATIONS FOR SUCCESS: No single order of government can fix our housing crisis on its own. We need a national approach, through a Pan-Canadian Framework for Housing Growth, that is supported by better data, publicly available climate hazard mapping, and specific housing growth targets for every government.

In the absence of such a framework, governments must act independently. However, the sheer number of needed reforms can be overwhelming, and it is unrealistic to expect any government to have enacted all of them, so this report assesses performance based on the most critical criteria and policy actions outlined in the Blueprint.

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