

## BUILD, BABY, BUILD: AN OVERVIEW OF UPDATES REGARDING THE HOUSING SUPPLY ACT, HOUSING SUPPLY REGULATION AND HOUSING TARGET ORDERS

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In November 2022, we published an [article](#) on British Columbia's *Housing Supply Act*<sup>1</sup> (the "**Act**"), summarizing notable provisions and providing an overview on how the Act could operate to increase housing supply across British Columbia ("**2022 Article**"). We compared the *Act* to Ontario's *More Homes Built Faster Act, 2022*<sup>2</sup>, which was enacted to increase housing supply in Ontario and is now in effect.

At the time of writing, we noted that the *Act* would not come into force until mid-2023. On May 31, 2023, pursuant to Order in Council 328/2023, the *Act* was brought into force, and the *Housing Supply Regulation*<sup>3</sup> (the "**Regulation**") was created.

In addition, on October 1, 2023, the Minister of Housing (the "**minister**") made ten housing target orders requiring ten municipalities to build a specified number of net new housing units within the next five years.

In light of the *Regulation* coming into force and the new housing target orders, this article briefly reviews the important provisions of the *Act*, outlines the *Regulation* and considers additional recently enacted

legislation related to the supply of housing in British Columbia. This article then considers the potential impacts of the legislation and housing target orders on the construction industry generally.

### APPLICATION OF THE ACT

With the exception of Section 13 [*provision of housing information to minister*], the *Act* and *Regulation* apply only to "specified municipalities".<sup>4</sup> Section 13 of the *Act* and Section 7 of the *Regulation* require that all municipalities, not just specified municipalities, collect and provide specified housing information to the minister on the request of the minister.<sup>5</sup> If the minister does not request the information from the municipality, the municipality is not obligated to provide it.

A "specified municipality," is one prescribed by the *Regulation* as a "specified municipality."<sup>6</sup> Under the *Regulation*, there are 47 specified municipalities.<sup>7</sup> These specified municipalities range from larger municipalities, such as the City of Vancouver, to smaller municipalities, such as the Town of Lake Cowichan.<sup>8</sup>

## MINISTERIAL POWERS PURSUANT TO THE ACT

Under Section 2(1) of the *Act*, where a municipality is designated as a specified municipality, the minister may subject that specified municipality to a housing target order.<sup>9</sup> It is important to note that housing target orders do not apply to Indigenous land, as defined in the *Act*.<sup>10</sup>

Described in Part 2 of the *Act*, housing target orders allow the minister to impose a housing target on a specified municipality and, subject to extensions and exceptions articulated in the *Act*, allow the minister to require that the specified municipality meet the housing targets by a certain deadline.<sup>11</sup>

Under Section 2(2) of the *Act*, the housing target order must specify the following:

- a) the specified municipality to which the housing target order applies;
- b) the housing target or housing targets established;
- c) the performance indicators and timeline by which progress by the specified municipality toward meeting each housing target is to be assessed;
- d) the reporting period for the specified municipality; and
- e) any other matters required by regulation.<sup>12</sup>

As an example, the District of North Vancouver is now subject to ministerial order number M280.<sup>13</sup> The District of North Vancouver has been given a target of 2,838 housing units, which represents 75% of the Provincial Housing Needs Estimate for the District of North Vancouver.<sup>14</sup>

In Schedule A, the housing target order describes how the District of North Vancouver's progress towards meeting its housing target order will be measured.<sup>15</sup> The

District of North Vancouver will report on its progress annually and will be expected to deliver net new housing units, as follows, up to a total of 2,838:

- a) Year 1: 499
- b) Year 2: 1,021
- c) Year 3: 1,577
- d) Year 4: 2,179
- e) Year 5: 2,838.<sup>16</sup>

Each year indicates the cumulative number of net new housing to be delivered (for example, when the District of North Vancouver reports on net new housing delivered in Year 2, the government will expect it to have delivered 1,021 net new housing units inclusive of the 499 housing units provided in Year 1. The District of North Vancouver will not be expected to provide 1,021 net new housing units in Year 2 alone).

According to the government, these new housing units must be completed, meaning "ready for move in".<sup>17</sup> As the government is measuring net new housing units, any housing units that were lost through demolition will be subtracted from the total.<sup>18</sup> In addition, "if the cumulative annual housing target has not been met, the municipality will be required to submit planned actions they will take within two years to meet the target".<sup>19</sup>

Schedule B provides several performance indicators to measure annual progress toward achieving the housing target.<sup>20</sup> Aside from the number of the net new housing units delivered, performance indicators include the adoption of policies and initiatives to meet housing targets.<sup>21</sup>

## REQUIREMENTS ON MINISTER RE: HOUSING TARGET ORDERS

In imposing a housing target order, the *Act* and *Regulation* require that the minister:

1. consider certain factors pertaining to the specified municipality<sup>22</sup>; and
2. consult with the specified municipality.<sup>23</sup>

### *Considerations*

Section 3(1) of the *Act* lays out several considerations that the minister must take into account when creating a housing target order.<sup>24</sup> These considerations include: housing needs reports, community plans, regional growth strategies, relevant statistical information, information regarding the availability and accessibility of transportation; and other reports and information received by the minister.<sup>25</sup>

### *Consultation*

In addition to the considerations described above, Section 3(2) of the *Act* requires that the minister consult with the specified municipality before making a housing target order.<sup>26</sup>

Accordingly, under Section 3(3) of the *Act* the minister must provide a description of the proposed housing target order to the specified municipality and must provide an opportunity for the specified municipality to provide comments to the minister.<sup>27</sup>

To provide an adequate opportunity for consultation, Section 4(1) of the *Regulation* requires that the minister “provide the specified municipality a period of **30 days** in which to provide written comments to the minister”.<sup>28</sup>

If the specified municipality provides a written request before the expiry of the specified period provided by the minister, under Section 4(2) of the *Regulation*, the

minister may extend the period for the length of time specified by the minister.<sup>29</sup> It is important to note that the minister is not obligated to comply with the specified municipality’s request for an extension.

## IMPOSED HOUSING TARGET ORDERS

As mentioned above, effective October 1, 2023, the minister made ten housing target orders under the *Act*, thereby providing ten municipalities with housing targets, performance indicators and a timeline by which the progress made by each specified municipality towards meeting its specified housing targets would be assessed. These 10 municipalities were chosen from the list of 47 municipalities included in the *Regulation*.

These municipalities and their final housing targets are as follows<sup>30</sup>:

- City of Abbotsford — 7,240 housing units
- City of Delta — 3,607 housing units
- City of Kamloops — 4,236 housing units
- District North Vancouver — 2,838 housing units
- District of Oak Bay — 664 housing units
- City of Port Moody — 1,694 housing units
- District of Saanich — 4,610 housing units
- City of Vancouver — 28,900 housing units
- City of Victoria — 4,902 housing units
- District of West Vancouver — 1,432 housing units

In addition to the housing target order, the Province has sent each of the 10 municipalities a list of housing target guidelines indicating what types of housing it would like to see built.<sup>31</sup> These guidelines included recommendations regarding the number of units of a certain size (one bedroom, two bedroom, three

bedroom), number of rental units, number of owned units, number of below-market rental units and number of units with on-site supports.<sup>32</sup>

Municipalities are not currently obligated under the *Act* or *Regulation* to comply with the housing target guidelines; however, this may change in the future, especially if the government is not satisfied with the types of housing being built. It is important to note that certain sources of provincial funding may be tied to the specified municipality providing a certain type of housing (for example: supportive housing, rental housing, or housing with 3-or-more bedrooms).

## REQUIREMENTS FOR A SPECIFIED MUNICIPALITY SUBJECT TO A HOUSING TARGET ORDER

Once a specified municipality is subject to a housing target order, it is required to submit a housing target progress report to the minister and make such report publicly available.

Under Section 4(2) of the *Act*, the housing target progress report must include the following in relation to each housing target established in the order:

- a) information about the actions taken by the specified municipality toward meeting the housing target;
- b) information about the progress of the specified municipality toward meeting the housing target, as assessed in accordance with the performance indicators and timeline specified in the housing target order;
- c) if the housing target has not been met, information about any actions that the specified municipality intends to take toward meeting the housing target within the 2-year period following the report;
- d) any other prescribed information.<sup>33</sup>

Section 5(1) of the *Regulation* requires that the housing progress report contain contact information for follow-up by the minister of those involved in preparing the housing target progress report.<sup>34</sup>

Section 5(2) of the *Regulation* also provides that the council of a specified municipality must receive a housing target progress report by resolution within 45 days after the end of the reporting period to which the report applies (the reporting periods are typically annual, running from October 1).<sup>35</sup> In accordance with Section 4(3)(b) of the *Act*, this resolution must be made at a meeting open to the public and must also be published on the municipal internet site and submitted to the minister for review.<sup>36</sup>

## COMPLIANCE WITH HOUSING TARGET ORDER

If a minister determines, after reviewing a housing target progress report submitted by a specified municipality, that the specified municipality has:

- a) not met a housing target that applies to it; and
- b) has not made satisfactory progress towards meeting the housing target,

then the minister may attempt to compel a specified municipality to comply with the housing target pursuant to Section 6(2) of the *Act* by doing one or both of the following:

- a) appoint one or more advisors...in relation to the specified municipality;
- b) issue a directive...to the specified municipality.<sup>37</sup>

If the minister issues a directive, and the specified municipality does not comply with the directive, then the Lieutenant Governor in Council, on the recommendation of the minister, may, by order, do one or both of the following:

- a) enact or amend a bylaw referred to in section 584 (1) [*ministerial override orders in the public interest*] of the *Local Government Act*;
- b) issue or refuse to issue a permit that the specified municipality may issue under the *Community Charter*, the *Local Government Act*, the *Vancouver Charter* or a prescribed enactment.<sup>38</sup>

### *Appointing an Advisor*

Under Section 7(2) of the *Act*, the minister must consult the specified municipality before appointing an advisor under Section 8 of the *Act*.<sup>39</sup>

In order to fulfill this consultation requirement, the minister must provide a description of the proposed action to the specified municipality.<sup>40</sup> Section 6(3) of the *Regulation* requires that the description of the proposed appointment includes:

- a) the proposed scope of the advisor's review under section 8 (1) [*advisor*] of the *Act*; and
- b) an estimate of the length of time required for the review.<sup>41</sup>

Under Section 6(1) of the *Regulation*, the minister must then provide the specified municipality a period of 30 days in which to provide written comments to the minister unless a written request is made, in which case the minister may extend that period.<sup>42</sup>

A deeper analysis of the role of the Advisor is included in our 2022 Article and will not be repeated here; however, generally speaking, the appointed advisor has broad powers to review and evaluate the actions taken by the specified municipality towards meeting the applicable housing target.<sup>43</sup>

The advisor must then provide a report of its activities and findings to both the specified municipality and the minister.<sup>44</sup>

### *Issuing a Directive*

As mentioned above, if the minister is not satisfied with the specified municipality's progress towards meeting its housing target, then in addition to or instead of appointing an advisor, the minister may issue a directive requiring the specified municipality to do any of the following, subject to the provisions of the *Act*:

- a) enact or amend a bylaw referred to in section 584 (1) [*ministerial override orders in the public interest*] of the *Local Government Act*;
- b) issue or refuse to issue a permit that the specified municipality may issue under the *Community Charter*, the *Local Government Act*, the *Vancouver Charter* or a prescribed enactment.<sup>45</sup>

The actions listed above constitute a substantial imposition on the specified municipality and accordingly may only be taken if the specific conditions set out in Section 11 of the *Act* are met. A directive may only be issued if:

- a) the benefit of issuing the directive is greater than the benefit of not issuing it;
- b) no less onerous alternative would result in the specified municipality meeting, or making satisfactory progress toward meeting, a housing target that applies to it; and
- c) issuing the directive is in the public interest.<sup>46</sup>

Under Section 7(2) of the *Act*, the minister must consult the specified municipality before issuing a directive under Section 11 of the *Act*.<sup>47</sup>

Under Section 6(1) of the *Regulation*, the minister must then provide the specified municipality a period of 30 days in which to provide written comments to the minister unless a written request is made, in which case the minister may extend that period.<sup>48</sup>

In order to facilitate the required consultation for both the provision of advisors and the issuing of directives, Section 3 of the *Regulation* requires the specified municipality to “provide the minister the name, position title and business contact information of a primary contact person for the purposes of consultations under ... [section] 7(2) [of the *Act*].”<sup>49</sup>

### *Order in Council*

The most powerful tool the government has to enforce a specified municipality’s compliance with a housing target order is an Order in Council. An order may only be issued if a directive has already been issued by the minister under Section 11 of the *Act* and the specified municipality fails to comply with the directive.<sup>50</sup>

In such a case, under Section 12 of the *Act*, the Lieutenant Governor in Council, on the recommendation of the minister, may, by order, do one or both of the following:

- a) enact or amend a bylaw referred to in section 584 (1) [*ministerial override orders in the public interest*] of the *Local Government Act*;
- b) issue or refuse to issue a permit that the specified municipality may issue under the *Community Charter*, the *Local Government Act*, the *Vancouver Charter* or a prescribed enactment.<sup>51</sup>

In short, the government is able to pass a municipal bylaw and issue or refuse to issue a permit in order to facilitate a specified municipality meeting its housing targets.<sup>52</sup>

As with issuing a directive, an order may only be made in extenuating circumstances. The Lieutenant Governor in Council may only make the order if it is satisfied that:

- a) the benefit of making the order is greater than the benefit of not making it;

- b) no less onerous alternative would result in the specified municipality meeting, or making satisfactory progress toward meeting, a housing target that applies to it; and
- a) making the order is in the public interest.<sup>53</sup>

### REQUIREMENTS FOR MUNICIPALITIES THAT ARE NOT SPECIFIED MUNICIPALITIES

The majority of the provisions of the *Act* and *Regulation* apply to specified municipalities only. For example, a minister cannot set a housing target order, appoint an advisor, or issue a directive to or for a municipality that is *not* a specified municipality.<sup>54</sup>

Municipalities that are not specified by regulation must still comply with Section 13 of the *Act* and Section 7 of the *Regulation*.<sup>55</sup>

As noted above, Section 13 of the *Act* sets out information (in relation to supply and demand of housing) that the municipality must collect and provide to the minister at the minister’s request.<sup>56</sup> It also allows regulations to be prescribed to either limit or expand the type of information a municipality must collect and provide.<sup>57</sup>

Section 7 of the *Regulation* expands the list of information that a municipality must collect and provide to the minister at the minister’s request to include:

- a) the area and location of land in the municipality that is zoned for residential, commercial, industrial or any other use;
- b) the current use of land referred to in paragraph (a);
- c) the planned residential density of subdivided vacant and undeveloped land;
- d) the number of residential lots in the municipality that have not been built upon;

- e) the number of applications received by the municipality, during the period specified in the request, for permits the municipality is authorized to issue under the *Community Charter*, the *Local Government Act* or the *Vancouver Charter*;
- f) the median time from receipt of an application referred to in paragraph (e) to a decision by the municipality on the application;
- g) the number of permits issued in relation to applications referred to in paragraph (e) and the number of housing units to which the permits relate;
- h) the number of applications referred to in paragraph (e) that were refused;
- i) information respecting development constraints, including, without limitation, municipal infrastructure capacity;
- j) copies of municipal zoning maps, including, without limitation, maps that identify any housing overlays and transit corridors.<sup>58</sup>

As the minister may request this information from any municipality, one might assume this is one method the minister will use to determine whether to include additional municipalities as specified municipalities.

### ***Additional Legislation***

The *Act, Regulation* and related housing target orders are only some of the tools the Province is using to increase the supply of housing in British Columbia. In April 2023, the government released its *2023 Homes for People Plan*, which outlines legislative and policy changes aimed at managing and regulating the supply of housing in the province.<sup>59</sup>

In order to achieve these aims, the government has enacted or proposed several pieces of legislation. Corporations and individuals interested in recent

government action on housing in British Columbia should consider the impacts of some of this legislation, including amendments to the *Strata Property Act*,<sup>60</sup> the introduction of Bill 35 – *2023 Short-Term Rental Accommodations Act*,<sup>61</sup> and the newly proposed Bill 44 – *Housing Statutes (Residential Development) Amendment Act, 2023*<sup>62</sup> in addition to the *Act, Regulation* and housing target orders.

### ***Strata Property Act***

Amendments made to the *Strata Property Act* in November 2022 affect many strata communities in B.C. by immediately preventing enforcement of certain strata bylaws.

While a deep analysis of the changes to the *Strata Property Act* is beyond the scope of this article, some of the important changes are:

1. the repeal and amendment of several sections of the *Strata Property Act* that allowed strata corporations to restrict or prohibit the rental of strata lots. The strata corporation will not be permitted to “screen tenants, establish screening criteria, require the approval of tenants, require the insertion of terms in tenancy agreements or otherwise restrict the rental of a strata lot.”<sup>63</sup>; and
2. the addition of prohibitions preventing strata corporations from passing bylaws that impose age restrictions (note: to protect seniors’ communities, the strata corporation may allow bylaws that require residents be at least 55 years of age<sup>64</sup>).

### ***Short-Term Rental Accommodations Act***

The BC government has also introduced Bill 35 – *Short-Term Rental Accommodations Act*, which aims to regulate rentals with a tenancy period of less than 90 days.<sup>65</sup> The *Short-Term Rental Accommodations Act* received Royal Assent on Oct 26, 2023 and comes into

force by regulation. For a more in-depth summary of Bill 35, please see our article [here](#).

### *Bill 44*

While not yet enacted, the government has tabled Bill 44 – *Housing Statutes (Residential Development) Amendment Act, 2023* (“**Bill 44**”) which proposes to amend the *Local Government Act* and *Vancouver Charter*. Bill 44 is only in its first reading; however, we wanted to highlight certain important provisions:

1. generally speaking, on lands currently zoned as permitting only a single-family dwelling or a duplex, a local government must exercise its zoning bylaw powers under section 479 of the *Community Charter* to permit the development of at least an additional housing unit, subject to certain exemptions<sup>66</sup>;
2. local governments may not hold a public hearing in certain circumstances. Generally speaking, a local government may not hold public meetings:
  - a) regarding a proposed zoning bylaw if the zoning bylaw is consistent with the official community plan and the purpose of the bylaw is to permit residential development; or
  - b) regarding a proposed zoning bylaw when the bylaw is, in whole or in part, for the purpose of permitting the increased density the local government is required to permit under the *Local Government Act*, described in general terms above<sup>67</sup>; and
3. every local government (subject to few exceptions) must adopt an official community plan<sup>68</sup>;
4. every local government (subject to few exceptions) must receive a housing needs report

that includes the total number of housing units required to meet anticipated housing needs for the next 5 years and the next 20 years.<sup>69</sup>

This is only a high-level description of certain provisions of the Bill 44. We will be publishing an in-depth analysis of Bill 44 in the near future exploring the nuances of the proposed legislation; however, for the purposes of this article, the important take-away is that local governments are going to be obligated to permit more density and provide more housing units.

### ***Impacts on the Construction Industry***

The government is facing significant pressure to increase the housing supply in the province. In its Homes for People action plan, the government identified four priorities related to the provision of housing in British Columbia:

1. speeding up delivery;
2. increasing the supply of small scale, multi-unit housing;
3. helping those who need it the most; and
4. fighting speculation and profiteering.<sup>70</sup>

While the government is not obligated to act in accordance with these priorities, it has listed several actions it intends to take in alignment with its stated goals. Some of the actions include:

1. increased funding: more than \$4 billion over three years (Budget 2023) with a commitment to invest \$12 billion over the next 10 years to build thousands of new homes<sup>71</sup>;
2. zoning changes to increase the supply of small-scale, multi-unit housing<sup>72</sup>;
3. speeding up permitting to reduce costs and speed up approvals to get homes built faster<sup>73</sup>;



4. the introduction of a flipping tax to discourage short-term speculation.<sup>74</sup>

Of particular interest might be the government's stated intention to expand BC's construction workforce and spur innovation within the construction industry. Initiatives like the Future Ready Plan aim to assist individuals in obtaining skills and finding employment in the construction industry.<sup>75</sup>

In addition, the government has highlighted its interest in new technologies, such as digital permitting and mass timber, which may speed up the construction process.<sup>76</sup> Those in the construction industry should keep an eye out for incentives and support from the government and may expect that local governments may have more resources to put into certain types of residential construction projects.

While the government has only imposed 10 housing target orders as of the date this article is published, it has said it will impose more.<sup>77</sup>

Given the intense pressure municipalities are under to deliver housing units, it is reasonable to think that overburdened municipalities may divert time and resources from non-residential projects to residential developments. This is especially the case for municipalities under a housing target order or that are at risk of becoming subject to a housing target order.

Those in the construction industry working closely with certain municipalities should familiarize themselves with the specific housing needs of that municipality, as outlined in its housing needs reports or other documents. The government is clearly keen to see more small-scale, multi-unit dwellings, and this priority will likely be reflected in housing needs reports.

As small-scale, multi-unit dwellings seem to be the government's priority, those in the construction industry may wish to highlight their experience in that area and

consider the government's desire for innovative technologies (such as the use of mass timber) when responding to RFPs.

## CONCLUSION

At the time we published the November 2022 article, it was unclear whether the *Act* would, in fact, require local governments to act quickly in response to the ongoing housing crisis across British Columbia.

The housing target orders have only recently been enacted and it remains to be seen what effect, if any, the *Act* and *Regulation* will have on municipalities that are not subject to housing target orders (the vast majority of municipalities in British Columbia); however, by forcing certain local governments, including the City of Vancouver, to adhere to prescribed metrics, at the very least, citizens of British Columbia will be able to see if those specified municipalities succeed or fail in meeting their housing target orders.

More importantly, if those specified municipalities **do** meet their housing target orders, British Columbians will be able to consider whether such housing target orders went far enough to increase housing supply, and affordability, in British Columbia. If specified municipalities **do not** meet their housing targets, it will be interesting to see how the government exercises its powers under Sections 11 and 12 of the *Act*.

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Footnotes:

1. SBC 2022, c 38 [*Act*].
2. SO 2022, c 21.

3. BC Reg 133/2023 [*Regulation*].
4. *Act*, *supra* note 1, s 2.
5. See: *Act*, *supra* note 1, s 13 and *Regulation*, *supra* note 3, s 7.
6. *Act*, *supra* note 1, s 1, ss 20(2)(a).
7. *Regulation*, *supra* note 3, s 2.
8. *Ibid*.
9. *Act*, *supra* note 1, ss 2(2).
10. *Ibid*, ss 2(3).
11. See *Ibid*, Part 2 – Housing Targets.
12. *Ibid*, *supra* note 1, ss 2(2).
13. BC Ministerial Order, M280 [Housing].
14. *Ibid*, Schedule A, s 2.
15. *Ibid*.
16. *Ibid*, Schedule A, s 3.
17. See: Government of BC, “Backgrounder” (26 September 2023), online: <<https://news.gov.bc.ca/releases/2023HOUS0123-001505>>
18. *Ibid*.
19. *Ibid*.
20. *Ibid*, Schedule B.
21. *Ibid*.
22. *Act*, *supra* note 1, ss 3(1).
23. *Ibid*, ss 3(2).
24. *Ibid*, ss 3(1).
25. *Ibid*.
26. *Ibid*, ss 3(2).
27. *Ibid*, ss 3(3).
28. *Regulation*, *supra* note 3, ss 4(1).
29. *Ibid*, ss 4(2).
30. See: Government of BC, “Targets released for 10 municipalities to deliver more homes for people” (26 September 2023), online: <<https://news.gov.bc.ca/releases/2023HOUS0123-001505>>
31. See: Government of BC, “Backgrounder” (26 September 2023), online: <<https://news.gov.bc.ca/files/HousingTargetGuidelines.pdf>>
32. *Ibid*.
33. *Act*, *supra* note 1, ss 4(2).
34. *Regulation*, *supra* note 3, ss 5(1).
35. *Ibid*, ss 5(2).
36. *Act*, *supra* note 1, ss 4(3)(b).
37. *Ibid*, ss 6(1) (2).
38. *Ibid*, s 12.
39. *Ibid*, ss 7(2).
40. *Ibid*, ss 7(3).
41. *Regulation*, *supra* note 3, s 3.
42. *Ibid*, s 6(1).
43. See: *Act*, *supra* note 1, s 8.
44. *Ibid*, s 10.
45. *Ibid*, ss 11(1).
46. *Ibid*, ss 11(2).
47. *Ibid*, ss 7(2).
48. *Regulation*, *supra* note 3, ss 6(1).
49. *Ibid*, s 3.
50. See, *Act*, *supra* note 1, ss 12(1).
51. *Ibid*, ss 12(1).
52. See, *ibid*.
53. *Ibid*, ss 12(2).
54. *Ibid*, s 2.
55. *Ibid*, s 13.
56. *Ibid*.
57. *Ibid* ss 13(e).

58. *Regulation*, *supra* note 3, s 7.
59. See: Government of BC, “Homes for People, An Action Plan to Meet the Challenges of Today and Deliver More Homes for People, Faster” (1 November 2023), online: [https://news.gov.bc.ca/files/Homes\\_For\\_People.pdf](https://news.gov.bc.ca/files/Homes_For_People.pdf) [*Homes for People Plan*]
60. SBC 1998, c 43 [*Strata Property Act*].
61. Bill 35, *2023 Short-Term Rental Accommodations Act*, 2023 4th Sess, 42nd Parl, British Columbia [*Bill 35*].
62. Bill 44, *Housing Statutes (Residential Development) Amendment Act*, 2023, 4th Sess, 42nd Parl, British Columbia [*Bill 44*].
63. *Strata Property Act*, *supra* note 57, s. 141.
64. *Ibid*, s. 123.1,
65. See: *Bill 35*, *supra* note 58, s. 1.
66. See: *Bill 44*, *supra* note 59, cl 12.
67. See: *ibid*, cl 5.
68. See: *ibid*, cl 9.
69. See: *ibid*, cl 11 and 26.
70. *Homes for People Plan*, *supra* note 56 at page 2.
71. *Ibid* at pages 2-3.
72. *Ibid*.
73. *Ibid*.
74. *Ibid*.
75. See *ibid* at page 20.
76. *Ibid*.
77. See Kaija Jussinoja, “B.C. reveals 60,000-unit housing target for 10 municipalities”, *CTV News* (26 September 2023), online: <<https://bc.ctvnews.ca/b-c-reveals-60-000-unit-housing-target-for-10-municipalities-1.6578560>>



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*Our lawyers combine legal experience in local government, commercial real estate development, and construction law to provide legal services to local governments, owners, builders and developers on a range of projects, from concept to completion, and beyond.*

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