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Build Canada Homes

Ministry of Housing, Infrastructure and Communities of Canada

Subject: Comments on the Build Canada Homes Sounding Guide

With *Build Canada Homes (BCH)*, the federal government is diving head-first back into the business of building houses. The aim, to accelerate and scale the delivery of affordable housing, is critical. But the plan is missing a major opportunity to achieve it: activating [community land trusts](#) (CLTs).

The [Canadian Network of Community Land Trusts](#) is a national network representing over 40 CLTs across 9 provinces and territories, in rural, suburban, and urban communities.

CLTs are non-profit, democratically-governed organizations that acquire and *permanently* steward real estate portfolios, freeing land from speculative markets so it can serve affordable housing and community purposes. CLTs in Canada already steward:

- Affordable housing, including rentals, co-operative housing, supportive housing, and affordable homeownership
- Commercial spaces, protecting small businesses from displacement
- Cultural spaces, enabling arts to thrive
- Agricultural projects tackling food insecurity and vacant lots

Let's be clear: CLTs are not a competitor to proven forms of affordable housing such as co-ops, because *CLTs are not a form of housing*. CLTs are land stewardship models that augment and amplify the power of affordable housing projects. Why else would [CHF BC](#), [CHF Toronto](#), and [Lu'ma](#), all reputable community housing sector organizations, all operate their own land trusts?



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Points of Compatibility

CLTs already deliver on many of the BCH Sounding Guide's key directions:

"... partner with builders and housing providers that are focused on long-term affordability - including cooperatives, community housing developments or builders that promote attainable homeownership solutions"

CLTs are structured to protect land from the speculative market, ensuring affordability is locked in structurally. Further, because CLTs steward land, not units, they can support co-operative housing (nearly [6,000 co-op](#) homes held by land trusts), attainable homeownership (see Whitehorse's [Northern CLT](#) and [Foncier Solidaire Brome Missisquoi](#)), and supportive housing.

"...large deals... (e.g., 300+ units) or a collection of smaller projects"

CLTs are portfolio-based by definition. CLTs consolidate disaggregated assets and also preserve low-density homes. Toronto's [Circle Community Land Trust](#) stewards 600 homes across 500 sites.

"...leverage private or philanthropic capital."

CLTs excel in mobilizing philanthropic and social finance. [Kensington Market CLT](#) and [Ottawa CLT](#) have raised millions through community bonds, closing financing gaps and reducing their reliance on public support while deepening civic engagement.

"...partner with contractors and other developers to build housing and lease to affordable housing providers"

CLTs successfully implement the "build and lease" model. This allows each party to focus on their expertise (housing operators to serve tenants and CLTs to acquire and manage real estate). Toronto's Neighbourhood Land Trust stewards [82 properties](#) that are leased to the YWCA to operate.



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“...working in close partnership with developers”

CLTs themselves are social-purpose real estate developers. [CLT of BC](#) has built hundreds of permanently affordable homes.

“...advancing affordability and other social outcomes.”

CLTs are built for social impact. Born out of the civil rights movement, CLTs give communities a collective voice, sometimes mobilizing hundreds of local members. Today, [Black communities](#) are advancing CLTs to fight displacement, including Upper Hammond Plains CLT’s leadership of the [largest Black-led co-op housing development](#) in Canadian history. Further, Reconciliation with Indigenous Peoples and solidarity through land-sharing is a [top-of-mind priority](#) for CNCLT members.

Points Missed

What’s missing from BCH thus far, which CLTs are ready to provide, is:

- **Permanent affordability:** 99-year affordability limits don’t scare CLTs; they inspire us. Speculative investment is driving today’s crisis, we need tools that neutralize homes as a speculative asset.
- **Deep affordability:** “Attainable” housing, or 80% of market, still excludes millions: seniors, students, people with disabilities, and many workers. CLTs intervene across the full continuum of need.
- **Community-driven solutions:** Financing and technical innovation mean little if projects are imposed on communities. CLTs are governed by residents and community members, grounding development in local realities.
- **Equitable and reparative action:** The renewed push to finance housing is an opportunity to support organizations led by and serving equity-deserving communities. Housing impact is greatest when those most affected are in the driver’s seat.



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- **Right-sized rural housing:** high-density is not suitable everywhere. CLTs are already supporting small and medium-sized communities with right-sized solutions, as seen in Québec's [*Territoires Solidaires*](#).
- **Mixed-use developments:** Healthy communities need more than housing. CLTs deliver affordable housing *and* community-serving real estate like cultural and commercial spaces, and BCH should be inclusive to mixed-use ventures.

Bottom Line

Build Canada Homes addresses many of the technical and financial pieces of the housing puzzle, but it stops short of tackling the root problem: homes have been hijacked by speculative real estate, and communities most affected by the crisis are too often left out of decision-making. Without *structural change* and *inclusive governance*, today's investments risk leaking out of the system, leaving affordability even worse within a generation.

CLTs are that structural and social change. They are how we can ensure that new investments stay affordable, locally accountable, and community-owned.

Canada has an opportunity to build more than homes—we can build permanence, equity, and trust.

Sincerely,

Nat Pace

Network Director

Canadian Network of Community Land Trusts