

Forum

Minister's Office, Ministry of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay Street
Toronto, ON M7A 2J3

Attention: Hon. Steve Clark, Minister of Municipal Affairs and Housing

Dear Minister Clark:

RE: Forum Asset Management's comments on the Province of Ontario's proposed Provincial Planning Statement

We express our gratitude for the chance to provide feedback on the proposed Provincial Planning Statement (**PPS**) announced by the Province of Ontario on April 6, 2023. Forum Asset Management wishes to submit the following comments for your consideration and utilization. We are pleased to observe policy initiatives within the PPS that aim to accelerate housing construction. Our remarks specifically focus on the provisions in the Housing section of the PPS concerning office space conversions, intensification, and student housing supply.

Forum Asset Management is an investor, developer, and asset manager operating across North America for over 25 years. We are the leading provider of Purpose-Built Student Accommodations (PBSA) with approximately 4,000 beds delivered and under construction. Forum Asset Management is also one of the largest owners and developers of student housing in Canada.

Student Housing Supply – A Two Birds One Stone Approach

Forum Asset Management offers our enthusiastic support for the proposed regulation, particularly its emphasis on student housing as a pivotal housing option. The policies outlined in the proposal demonstrate a proactive and well-rounded approach to addressing the housing needs of students across Ontario.

By identifying large/fast-growing municipalities not only in the Greater Toronto Area, but across the Province, and providing specific directives for strategic growth planning, the proposed regulation recognizes the importance of accommodating the increasing student population. The establishment and achievement of minimum density targets for major transit station areas, strategic growth areas, and urban growth centres will facilitate better access to educational institutions and essential amenities, creating conducive living environments for students.

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Moreover, the encouragement to plan for transit-supportive greenfield density targets indicates a commitment to environmentally friendly and sustainable student housing solutions. By promoting the development of diverse housing options, including multi-unit types like laneway and garden suites, low and mid-rise apartments, and multi-generational housing, the proposal addresses the unique requirements of students and fosters inclusive and vibrant communities. While building more housing is the goal, a revisit to the type and size of the housing can help increase supply to a great extent.

The requirement for municipalities to implement intensification policies will ensure the efficient use of existing infrastructure, encouraging the development of student housing in areas with adequate amenities and services. This will contribute to reducing commute times and enhancing the overall student living experience. Moreover, adding Purpose-Built Student Accommodation (PBSA) units will address "two birds with one stone" as it will provide much needed student housing while freeing up other inventory in apartment buildings and low-rise communities that are gravely needed for families and other demographics.

Furthermore, we propose that the unit size requirements for student housing be flexible and open to revision, allowing for the development of smaller, more affordable units that can better cater to the specific needs and budgets of students. An example of workable small-unit accommodation in Canada is what the University of British Columbia (UBC) offers. Called "Nano Suites" ([click here for a link](#)), they include 140 square feet of fully furnished space with high-speed wireless internet, a convertible desk/bed, a kitchenette, and a 3-piece bathroom.

To better serve the unique needs of students, policies regarding parking, parkland, amenity space, and other requirements in PBSA should be targeted specifically to cater to student demands rather than applying a uniform approach based solely on the number of units. Tailored policies can optimize land and resource utilization while accommodating students' distinctive transportation patterns, reducing the need for excessive parking spaces. Additionally, well-designed amenity spaces should be prioritized over quantity of outdoor space to enhance students' living experience, fostering a sense of community and supporting their academic pursuits. Incentives like DC rebates or exemptions and property tax payment abatements can play a role in encouraging the development of PBSA, but careful consideration must be given to ensure compliance with safety, quality, and zoning standards while promoting collaborative efforts among relevant stakeholders.

Unlocking Housing Potential: Embracing Office Conversions for Stronger Communities, more attainable housing, and Student Accommodation

Ontario finds itself in the midst of a housing crisis, and within the PPS several policy tools have been introduced to address the urgent need for increased housing construction. We endorse the policy guidance aimed at fostering intensification and redevelopment of housing. Forum

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Asset Management recognizes the significance of coordinating land use planning with housing planning to ensure a comprehensive array of housing options for residents and students, including attainable housing solutions. We are heartened to see the explicit reference to intensity and redevelopment as effective means to augment Ontario's housing supply, thereby promoting higher density and optimal use of land and municipal services – a principle that Forum Asset Management has actively embraced in multiple development projects.

In particular, policy 2.2.b.2, which permits and facilitates "all types of residential intensification, including the conversion of existing commercial and institutional buildings for residential use," aligns with our commitment to support various forms of residential intensification, while exercising ever needed sustainable development practices in reusing existing infrastructure. However, we believe that this policy could further incentivize the kind of intensification required to meet the ambitious housing targets and alleviate the housing crisis effectively. A substantial amount of available space, currently locked in as vacant office premises due to increased work-from-home arrangements, presents an exceptional opportunity for housing development. Offices are typically located in dense urban areas with appropriate access to transit, jobs and everyday amenities, necessary pieces to support attainable and student housing arrangements. As office vacancies reach historic highs, the time is ripe to unlock these spaces and transform them into much-needed housing options for all the people of Ontario, including students seeking suitable accommodation.

By embracing office conversions for residential use, Ontario can tap into unused potential and bolster its housing supply to address the pressing needs of its citizens and student community faster than a typical approval and ground up construction process. We advocate for a bold and innovative approach that capitalizes on this unique opportunity to create stronger and more vibrant communities throughout the Province.

We also extend our support for the removal of Provincially Significant Employment Zones (PSEZ) and the Municipal Comprehensive Review (MCR). Though these tools have been valuable, their unintended consequences have hindered developers' timely delivery of much-needed housing in the Province.

Recommendations

In light of the above items, we propose the following policy language to truly capture every type of residential intensification possible in Policy 2.2.b.2:

"all types of residential intensification, including the conversion of existing commercial, *office*, and institutional buildings for residential use, development and introduction of new housing options, *including student housing*, within previously

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developed areas, and redevelopment which results in a net increase in residential units in accordance with policy 2.3.3;”

Moreover, we propose the following policy language to enable a more diverse housing type supply, in accordance to the needs and requirements of the market in Policy 2.2.c:

“promoting densities ***through height and unit sizes*** for new housing which efficiently use land, resources, infrastructure and public service facilities, and support the use of active transportation; and”

Facilitating and incentivizing the development of small unit sizes and student accommodation, as well as the conversion of vacant office space into different types of housing is a sustainable and quick way to make use of existing resources. Office to residential conversions is a wise policy option that creates less construction waste and represents a lesser burden on municipal servicing than sprawl.

Thank you,

Aly Damji / Dayna Gilbert
Managing Partner, Real Estate / Managing Director, Real Estate Development

Cc: Mr. Ryan Amato (Ministry of Municipal Affairs and Housing)
Ms. Kirstin Jensen (Ministry of Municipal Affairs and Housing)