



May 10, 2024

CHF Canada's submission on proposed Planning Act, City of Toronto Act, 2006, and Municipal Act, 2001 Changes (Schedules 4, 9, and 12 of Bill 185 - the proposed Bill 185, Cutting Red Tape to Build More Homes Act, 2024)

ERO number 019-8369

On behalf of the Co-operative Housing Federation of Canada, thank you for the opportunity to comment on the housing-focused policies stemming from Bill 185, Cutting Red Tape to Build More Homes Act, 2024)

CHF Canada is the national voice of co-operative housing, representing 2,200 housing co-operatives, home to a quarter of a million people in every province and territory. Co-operative housing is a well-documented success story. In Ontario, we represent more than 550 non-profit housing co-ops, home to approximately 125,000 residents. For over 50 years, co-ops have provided good-quality, permanently affordable housing owned and managed by the community members who live there.

Reduce Parking Minimums

Many urban housing co-operatives are centrally located near transit and existing infrastructure. The province should consider the location of future development when balancing the goals of environmental protection, economic development, and affordable housing.

Reducing parking minimums near major transportation areas is an important step that could reduce the overall construction costs for new co-op housing developments.

“Use It or Lose It” Tools

While we understand the need to ensure the construction of more homes is started and completed within a reasonable timeframe, co-operative housing developments, like other affordable housing developments, are faced with greater barriers than private market development. We are supportive of the plan to create a Minister's regulation-making authority to enable the Minister to provide exemptions for individual or classes of approved developments. We suggest that affordable housing, including co-operative housing, be a specific 'class' of approved developments that are included in this exemption.

Facilitating Standardized Housing Designs



CHF Canada supports the idea of creating standardized housing designs, as they could reduce construction costs and speed up development approvals. Moreover, standardized housing designs add the needed stability and predictability to an ever-complicated housing environment.

Having standardized housing designs could also bring us closer to greater use of modular homes.

If the “certain specified lands” that the designs would apply to include surplus government-owned land, the province should strongly consider ensuring that housing built on this land is prioritized for affordable housing, including co-operative housing. This would help ensure that surplus land is kept as a public good.

Exempt Universities from the Planning Act

We are supportive of the plan to exempt universities from the Planning Act but encourage the government to consider extending these exemptions for student co-operative housing developments on land leased by the university. Additionally, off-campus student co-operative housing should also be exempt from the Planning Act.

There are several student housing co-operatives across Ontario – from Campus Co-op in Toronto to Waterloo Co-operative Residences. These co-ops provide a more affordable option for many students, and CHF Canada would like to see more built. Extending this exemption to student co-op housing could incent and spur development.

We appreciate your consideration of our feedback on Bill 135. CHF Canada looks forward to working with the Ministry of Municipal Affairs and Housing to ensure more co-operative housing is built province-wide. We share your government’s desire to build more homes faster and look forward to seeing steps put in place, including further incentives, to speed up the development approvals and construction of non-market housing and reduce costs to build this type of housing.