



May 10, 2024

CHF Canada's review of proposed policies for a new provincial planning policy instrument

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On behalf of the Co-operative Housing Federation of Canada, thank you for the opportunity to comment on the updated proposed Provincial Planning Statement.

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.

In August 2023, CHF Canada participated in consultations on the draft Provincial Planning Statement.

Our feedback focused on the fact that the previous draft Provincial Planning Statement lacked specific inclusion and guidance on protecting existing affordable housing stock and building new affordable housing, including co-operative housing. We also noted the omission of a definition of affordable housing.

We are glad to see the reintroduction of low and moderate income households as a defined term, and the associated requirement for Service Managers to address the full range of housing options and multiunit typologies – including affordable housing. This addition helps ensure that both the province and municipalities are supporting the growth of co-operative housing as an affordable housing option. We are looking forward to collaborating with municipalities, service managers and post-secondary institutions to facilitate the development of co-operative housing and to expand possibilities of student co-operative housing.

Housing targets also serve as an important avenue to set housing goals and promote accountability. While the 2023 draft included the notion that municipalities set targets overall, it excluded specificity on what types of housing and for whom. Our feedback in August 2023 was that municipalities should be required to set minimum targets for housing that is affordable to



low- and moderate-income households, based off the current need and population growth projections, and match this with a provincial program to finance the construction of this housing going forward. We are glad to see that the PPS will reintroduce the requirement for planning authorities to establish and implement targets for affordable housing. This is a step in the right direction to ensure that we are building the right type of housing mix in Ontario.

The province should ensure, as a core element, that strategic growth areas and communities around MTSAs are complete communities that provide homes to households of all incomes. The province could also require that a portion of this density around major transit station areas be affordable housing, including co-operative housing.

Travel distance and travel costs for low- and medium-income households to access work and schools should be a further consideration for the province given its impact on economic success and employment. This further supports the benefit of ensuring mixed-income communities around MTSAs.

We appreciate your consideration of our feedback updated proposed Provincial Planning Statement. 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 desire to build more housing and look forward to working with the province and municipalities to ensure this housing is affordable.