



**CHF Canada's submission on the proposed policies adapted from A Place to Grow and Provincial Policy Statement to form a new provincial planning policy instrument, ERO 019-6813.**

August 4, 2023

On behalf of the Co-operative Housing Federation of Canada, thank you for the opportunity to comment on the housing-focused proposed policies adapted from A Place to Grow and Provincial Policy Statement to form the new Provincial Planning Statement, ERO 019-6813.

CHF Canada is the national voice of co-operative housing, representing 2,200 housing co-operatives, home to a quarter of a million people across provinces and territories. 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.

**1. What are your thoughts on the policies that have been included from the PPS and A Place to Grow in the proposed policy document, including the proposed approach to implementation?**

The new Provincial Planning Statement, and its focus areas of; Building Homes, Sustaining Strong and Competitive Communities; Infrastructure and Facilities; Wise Use and Management of Resources; and Protecting Public Health and Safety are logical, but the lack of specific inclusion and guidance on protecting existing affordable housing stock and building new affordable housing, including co-operative housing, is a concern. Excluding the definition of affordable housing from the Provincial Planning Statement downplays the importance of maintaining and building net new affordable housing, including co-operative homes. After decades of severely limited growth, a renewed and specific focus on non-profit housing enshrined in policy and legislation is needed so that we can build more co-operative homes and more Ontarians have access to good-quality, stable affordable housing, with special consideration for low- and moderate-income households. Omitting this clarity will be detrimental with the potential of increasing homelessness, as well as added pressure of other more costly provincial services such as health care and safety services.

Given the interdependency between housing and homelessness plans, the integration of these plans could provide value, however, the province should ensure that the plan is fluid and addresses both affordable housing and homelessness as distinct but related issues. An integrated housing and homelessness plan must include fulsome and proactive guidance from the province to municipalities to enable the building of more affordable housing.



Related to the proposed policies governing Energy Conservation, Air Quality and Climate Change, CHF Canada member co-ops have passed four member resolutions related to the environment, including [a resolution passed in 2019](#) endorsing efforts of governments that have declared a climate emergency. At the 2023 Annual Meeting, CHF Canada adopted a [resolution](#) to promote the United Nations Sustainable Development Goals and Co-op 2030 Vision. We continue to encourage and support our members to be environmentally friendly by providing grants, resources and dedicated expert staff to help co-ops plan for energy saving, other green initiatives in existing buildings and to help them commit to pledges to achieve the Sustainable Development Goals.

To the same tune, for new construction of co-ops, we maintain these same values of environmental stewardship. For this reason, we support guidance outlined in the Provincial Planning Statement directing planning authorities to *'reduce greenhouse gas emissions and prepare for the impacts of a changing climate through approaches that support the achievement of compact, transit-supportive, and complete communities, support energy conservation and efficiency, promote green infrastructure, low impact development and active transportation, protect the environment and improve air quality'*.

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

Related to proposed implementation, municipalities and housing stakeholders should be given ample time to understand the policies and provide additional feedback should the policy direction change significantly from what is currently being proposed.

## **2. What are your thoughts on the proposed policy direction for large and fast-growing municipalities and other municipalities?**

While the proposed policy direction surrounding strategic growth areas and major transit station areas (MTSA) aim to support increased housing supply through density targets, it fails to provide direction on what kind of housing (market vs. affordable) and type of housing options should be prioritized in these areas, even though rental rates have soared while wages have stayed the same, and as Ontarians are facing historic economic pressures.

The province should ensure as a core element that strategic growth areas and communities around MTSA are complete communities that provide homes to households of all incomes. Rather than providing guidance on number of residents per hectare within MTSA, density targets should be more granular to reflect income quintiles, based on current need and population growth projections. [The Housing Assessment Resource Tools \(HART\)](#) from the University of British Columbia (UBC) provides a Housing Needs Assessment Tool that measures core housing need and affordable shelter costs by income category, household size and priority populations, using census data. This Tool can be used to set more specific housing and density targets.

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.

**3. What are your thoughts regarding the proposed policies to generate housing supply, including an appropriate range and mix of housing options?**

While the Provincial Planning Statement lists what types of housing are under the definition of ‘housing options’, the Provincial Policy Statement should also provide a definition of these types of housing, as well as define affordability. The Provincial Policy Statement does not reference affordable housing, rather just ‘affordability needs’. Direction within the proposed policies to generate housing supply, without reference or definition to affordable housing or without defining affordability, leaves a big gap and risks inaction to expand co-operative housing and other forms of non-market housing.

Targets have been offered as a proposed policy to generate housing supply but lack specificity on what types of housing and for who. The province should develop 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 program to finance the construction of this housing going forward. The current housing crisis is a result of the lack of affordable housing. Federal and provincial programs across Canada have and are being introduced to meet this key need. The success of Ontario is highly correlated with the ability to house its citizens of all incomes.

**4. What are your thoughts on the proposed policies regarding the conservation of agriculture, aggregates, natural and cultural heritage resources?**

CHF Canada supports policies to protect agriculture, aggregates, natural and cultural heritage resources, specifically those that are significant to the members of Indigenous communities. Implementation of these policies surrounding the preservation of resources must include consultation with Indigenous communities.

**5. What are your thoughts on the proposed policies regarding planning for employment?**

The preservation of employment lands is important as Ontario welcomes more investments to the economy and as Ontario welcomes more newcomers to work and live. The proposed policies surrounding employment lands, specifically related to removal of lands from employment areas (2.8.2) are flexible to allow for continual assessment of the viability and use of the land, however, does not provide enough direction on how land removed from employment areas should and could be used. CHF Canada recommends removed lands from employment areas be prioritized for affordable housing. This can be done through the creation of land trusts or land co-operatives, like what is being done in Nova Scotia.

Contributing to the goal of building complete communities, and within the context of an affordability crisis, CHF Canada believes the implementation of the proposed policies must



streamline development of affordable housing around employment areas and in major transit corridors.

**6. Are there any other barriers to, or opportunities for, accelerating development and construction (e.g., federal regulations, infrastructure planning and approvals, private/public partnerships for servicing, provincial permitting, urban design guidelines, technical standards, zoning, etc.)?**

In terms of opportunities, provincial surplus lands should be unlocked for affordable housing development. Taking “affordable housing first” approach, the government should focus on getting the maximum value out of these lands. This can be accomplished by viewing the land not as a one-time revenue generator, but as an asset that can be leveraged for the public good over the long- term. To do this, CHF Canada recommends that the sites appropriate for residential development be made available to the housing co-operative and non-profit sector at no cost and fully or partially exempt from property tax, or that a significant provision of permanently affordable housing be a condition of the sale. Non-profit affordable housing offered in perpetuity gives the province better value for money over the medium- to long-term, than the one-time cash provided by sale at market value. The government should also mandate the LCBO, Metrolinx and other enterprises and agencies of the province undergo a review of their real estate holdings and redevelop appropriate sites for affordable housing in perpetuity.

Understanding that increasing housing supply is a major goal of the government, efforts need to be maintained to ensure that the current affordable and non-market housing stock is protected and expanded. The province should consider creating a government program to assist housing co-operatives, non-profits, and land trusts to purchase existing affordable private rental housing, so that this housing can be made affordable in perpetuity. This is currently being implemented in the province of British Columbia.

The province should also encourage connections and incentivize partnerships between market and non-market housing providers to improve the feasibility of non-market housing developments including turnkey development solutions.

CHF Canada has been working to strengthen the co-operative housing sector so that the co-operative model is sustained and able to grow – our *Co-Op Housing for All* Vision. Part of this vision involves the unification of co-ops within other co-ops, which is already occurring in other provinces (British Colombia, Nova Scotia). This creative solution to strengthen the sector is possible in Ontario, but challenges arise when co-ops that want to unify span Service Manager jurisdiction. The province can play a role in this vision by providing consistency and guidance so that unification of co-ops doesn’t start and stop at Service Manager boundaries.

Speeding up the development approvals process and more specifically, shortening the time frame for rezoning applications, would also assist in accelerating the building of more homes. The province must also address causes for a slow approvals process, including the lack of sufficient planners. While some municipalities are already addressing this issue, a provincial approach is needed to ensure action across the board.