



Conestoga College Institute of Technology and Advanced Learning
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Ministry of Municipal Affairs and Housing

RE: Bill 185, Cutting Red Tape to Build More Homes Act, 2024

Regulation Number: Removing Barriers for Additional Residential Units, ERO 019-8366

May 10, 2024

Thank you for the opportunity to provide feedback to *The Cutting Red Tape to Build More Homes Act, 2024*.

Conestoga College Institute of Technology and Advanced Learning supports the government's Housing Supply Action Plan to build 1.5 million new homes over ten years. We are deeply committed to ensuring every student receives proper wrap-around services, including housing. In fact, over the last 10 months, we are proud to have invested in eight properties to expand existing student housing for our students. It is with this vantage-point and that we would like to take this opportunity to provide specific feedback for consideration.

Feedback for Consideration:

To encourage private developers to build more student housing on college-owned property through a land lease, it is strongly recommended that the benefits the college receives as the landowner in terms of **property tax, zoning, and development charges**, be passed onto the land leaseholder. This would also enable colleges to get more housing built for students on college lands with private sector capital. Further details provided below:

- **Property Tax:** Under the *Assessment Act*, the college must 'own, use and occupy' a property for it to be exempt from taxation. Adding a property tax burden to housing on college lands solely because a private sector partner is involved ultimately makes housing less affordable to students. Additionally, the Act requires Crown land to be assessed as if the tenant owns the land, which leaves lands that are currently exempt from property tax liable to taxation. Instead, where a land lease is used solely as a mechanism to attract private sector investment on college-owned lands for housing, the property tax status of the lands should not change, as this results in decreased affordability for students who are the end-users.
- **Zoning:** As a Crown Agent, municipal zoning bylaws do not apply to colleges. However, if a college wants to build student housing on college-owned lands through a land lease, then the municipal zoning by-law is triggered, resulting in the college being required to go through an expensive and lengthy re-zoning process with the municipality.

Allowing for Crown lands to be exempt from zoning bylaws when a land lease is in place, would allow for more student housing to be built faster on college-owned lands.

- **Development Charges:** If the College builds student housing on its lands without a private partner being involved, then the college is exempt from paying development charges. However, if a private partner is involved, the development charges (or a portion of development charges) will apply, ultimately resulting in higher housing costs for the end user, our students.

In addition, to further remove barriers to build more student housing, it is recommended that **'section 28'** be removed or exempted when developing units/housing for students. This would allow for more seamless and faster development without any barriers.

The Residential Tenancies Act (RTA) also provides for a very limited exemption for post-secondary use. It is recommended that colleges be given a broader exemption under the RTA to more easily enable colleges to provide students with housing leases off campus, which would help provide students with the housing they need.

Thank you for your consideration of our feedback. We remain committed to working constructively with the Ontario and Federal governments to ensure students have the housing they need and deserve.



John Tibbits

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