



August 21, 2024

The Honourable Jean-Yves Duclos, P.C, M.P.
Minister of Public Services and Procurement

VIA EMAIL: jean-yves.duclos@parl.gc.ca

Dear Minister Duclos,

CHRA strongly supports the *Public Lands for Homes Plan* as a key initiative to ensure that everyone in Canada has a safe and affordable home. **However, to achieve this objective, its implementation must prioritize non-market housing, and for-Indigenous-by-Indigenous housing.**

The Canadian Housing and Renewal Association (CHRA) is the national voice of the community housing sector in Canada. Collectively, our members house, shelter, and support hundreds of thousands of people across Canada, drawing on enormous, practical on-the-ground experience creating and delivering affordable housing in communities across Canada.

Investing in non-market community housing is one of the most impactful ways to improve the lives of millions of people across the country. A recent report published by Scotiabank called for doubling the community housing stock in order help the 1.5 million people living in core housing need. RBC recently called for quadrupling the rate at which we build new community housing. A study by Deloitte found that doubling the share of community housing would boost economic productivity by 5.7- 9.3%. Investing in community housing can help meet several important objectives of the National Housing Strategy. By providing affordable housing we can facilitate the social and economic inclusion of individuals necessary to contribute to Canada's economic growth.

We also believe that public lands should be used to achieve the greatest impact and must be used to invest in and grow non-market community housing options. Therefore, CHRA recommends the following measures be adopted in the implementation of the *Public Lands for Homes Plan*:

1. **Prioritize Community Housing:** Non-profit and co-operative housing providers will always work to exceed minimum affordability criteria. By requiring that all proposals include a community housing provider within the partnership, the *Public Lands for Homes Plan* will ensure as much affordability as is possible in the long-term. It will also help community housing providers to scale up, benefit from the greater capacity of their private-sector partners, and create a larger, stronger, and more resilient community housing supply. **The *Public Lands for Homes Plan* must require that all proposals to build housing on federal lands include a non-profit, co-operative, or land trust within the partnership.**
2. **Prioritize urban, rural, and northern Indigenous housing:** A significant gap remains in housing outcomes for Indigenous Peoples living in urban, rural, and northern (URN) areas. The federal government has made funding commitments for URN Indigenous housing, and that must be

matched by land opportunities. Many of these federal lands are already unceded Indigenous territories, highlighting a crown responsibility to prioritize Indigenous-led affordable housing projects. **The *Public Lands for Homes Plan* must set targets and give priority to Indigenous-led community housing developments on federal land.**

3. **Streamline access to development resources:** Housing development is resource- and time-intensive, but our housing affordability crisis is immediate. The Government of Canada must streamline access to public lands and associated development funding and low-cost financing, by following the successful model of BC Builds, bundle financing, funding, approvals, and land to speed up timelines and allow developers to avoid serial application processes that add delays and cost. **The *Public Lands for Homes Plan* must bundle land, financing, and funding to accelerate the development timeline.**
4. **Modernize the mandate of Canada Lands Company (CLC):** The current mandate of CLC emphasizes market-rate commercially oriented sale of public land. To facilitate building truly affordable homes on federal lands this market-led mandate must be changed. Doing so would allow CLC to support the construction of more non-market housing, using methods such as long-term \$1 land leases. **The CLC mandate must be updated to include building affordable non-market community housing.**
5. **Simplify the Public Lands Acquisition Fund:** The Public Lands Acquisition Fund provides Public Services and Procurement Canada with \$500 million over five years to purchase land from other orders of government. Some municipalities, provinces and territories are already making their land available for mixed-income affordable housing. The Public Lands Acquisition Fund must build on these existing processes. We strongly recommend that rather than purchasing this land just to turn around and sell it again, the federal government should provide incentive grants when the land is transferred to a community housing developer. This simplified process avoids multiple land transactions, reduces bureaucratic delays, and accelerates the timeline for development. **The Public Lands Acquisition Fund should provide other orders of government with incentive grants when they transfer land to community housing developers.**

CHRA and our members strongly support the goals and objectives of the *Public Lands for Homes Plan* to build more affordable homes, and we look forward to working with you and your team to get the job done.

I would like to request a meeting with you in the coming weeks to discuss these recommendations and how we might work together to ensure this program's success. In the meantime, should you have any questions please feel free to contact me at ray@chra-achru.ca.

Sincerely,



Ray Sullivan

Executive Director

cc. Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Finance
Hon. Sean Fraser, Minister of Housing, Infrastructure and Communities
Paul Halucha, Deputy Minister of Public Lands and Housing