

January 10, 2022

To: All Members of City of Hamilton Council and Senior Planning Staff

**Rethinking Hamilton's Planning Framework: Can We Park Minimum Parking Requirements?**

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WE HBA would like to draw your attention to the **high cost of free parking**. In Hamilton, one underground or above ground structured parking space costs anywhere between \$30,000 - \$80,000 to build depending on soil conditions, the number of underground levels and the water table. This exorbitant cost is currently hidden in Hamilton's housing costs through higher rents or purchase prices, and, presents a significant barrier to the construction of badly needed new housing supply. In December, WE HBA was invited by the Provincial Government to make an oral presentation and written submission to the *Housing Affordability Task Force*. As part of our recommendations to the Provincial Task Force, WE HBA recommended that the Ministry of Municipal Affairs and Housing eliminate minimum parking requirements for residential housing and let the free market determine the actual demand for parking.

The hard construction costs and additional time it takes to excavate and construct multiple levels of underground parking is significant; and these costs are ultimately passed on to homebuyers and renters. In many cases, purchasers and renters who do not even own a car are paying both capital costs and ongoing maintenance costs for unnecessary automobile infrastructure. We share this with you because the WE HBA believes that Hamilton should be a leader in addressing housing affordability by eliminating minimum parking requirements mandated through your existing zoning bylaws. Requiring minimum parking standards (which often exceed market demand) makes little sense for developments near transit, in a society that increasingly utilizes car and bike sharing apps, or for a City that is seeking to reduce its GHG emissions.

Furthermore, given society's shift away from private automobiles to transit, active transportation, autonomous vehicles, and car sharing apps – there is a very real risk that expensive underground parking facilities will become stranded assets and a significant ongoing maintenance burden for condominium corporations and purpose-built rental buildings. These higher project costs that result from the construction, provision and maintenance of parking should not be embedded into the cost of new housing.

**Co-Benefits for Eliminating Parking Requirements**

Eliminating parking requirements presents Hamilton with significant co-benefits beyond improving housing affordability. This is in terms of sustainability through reduced car dependency and hardscaping, motivating more people to choose active transportation options, enabling more adaptive re-use of heritage structures, facilitating greater levels of intensification, and encouraging more "missing middle" homes city-wide. In essence, it doesn't make any sense for Hamilton to continue to mandate a certain minimum standard for parking that exceeds actual demand.



**How WE HBA is Moving the Needle**

As mentioned above, WE HBA is advocating to the provincial government as well as our municipal partners including the City of Hamilton for the complete removal of minimum parking standards for new residential developments. WE HBA has also engaged a student research team from the Ryerson University School of Urban and Regional Planning to provide research on what Hamilton can learn from other North American jurisdictions in terms of eliminating minimum parking provisions in our zoning by-laws. Through this research we're also hoping to share what opportunities exist for our builder and developer members to reduce the amount of unnecessary parking in the City of Hamilton. WE HBA is hoping to work with the City of Hamilton on this initiative and would appreciate your assistance as we strongly believe this initiative aligns with long-term city building objectives.

**The Free Market, Not Government Regulation Should Determine Parking Requirements**

WE HBA is not suggesting that the City of Hamilton should have no parking. There is nothing wrong with a private business opting to provide parking for its customers, or a new residential building choosing to provide it. But those businesses and home builders are perfectly capable of assessing their own need for parking, and weighing it against the other, potentially more valuable things they might do with the same land, or with the financial resources our members are currently required to spend on parking their customers don't want. Only when minimum parking is not mandated can our members do that weighing and decide what it's worth, and to build it accordingly.

**Leadership is Required**

Frankly, the subsidies and government-imposed requirements create car storage that has shredded the fabric of many of North America's urban areas. The downtown core of the City of Hamilton has not fared well in the era of the automobile. With a shift towards higher densities and a desire by the City of Hamilton to more than double the rate of intensification, radical changes to our public policy framework are required immediately. Today, more cities than ever are revisiting parking minimums and reducing or abolishing them. These towns and cities are coming to the realization that they don't need these counterproductive by-laws on their books and are repealing them. Working with Ryerson University, WE HBA is excited in the months ahead to share and profile successful efforts before in cities including Edmonton, Hartford, Buffalo, Portland, and most recently Toronto. Parking minimums are so prohibitive for small-scale residential buildings that they make great walkable neighborhoods effectively illegal to build or replicate today. WE HBA is excited by the opportunity to work together with the City of Hamilton to change this.

Sincerely,

A handwritten signature in grey ink, appearing to read 'Mike Collins-Williams'.

Mike Collins-Williams, MCIP, RPP  
Chief Executive Officer  
West End Home Builders' Association

