



West End Home Builders' Association

1112 Rymal Road East, Hamilton

Serving members in Hamilton and Halton Region

August 14, 2023

To: Mayor Horwath and Members of Hamilton City Council
71 Main Street W
Hamilton, ON

WE HBA Submission: Parking Standards Review and Update (City Wide)

Amidst the ongoing housing crisis, the feasibility, practicality, and effectiveness of City policy and by-laws must be a top priority. Striking a balance between these objectives and delivering more housing for Hamilton's growing population must be paramount. City Council has made it a priority to increase the tax productivity of land through intensification and new development. As such, WE HBA is looking forward to engaging with the City of Hamilton on their Parking Standards Review and Update. We encourage City Council to be bold when engaging in parking reform, and thoroughly consider the full elimination of mandatory parking minimums City Wide.

Hamilton has been working towards a shift to more sustainable travel options and encouraging denser, transit-oriented development forms. Recent research and trends have shown that parking minimums have been and continue to be used to promote automobile dependency and make driving the easiest mode of choice.¹ Cities across North America have vastly reduced or outright eliminated their mandatory parking minimums in the face of changing transportation and land-use patterns. Based on the emerging research into parking minimum reduction or elimination across North America, including Hamilton, it is shown that the cost of parking is high, and parking minimums have an impact on affordability and feasibility of developments.² We appreciate that City Staff have identified that "when parking standards are set to meet prevailing auto ownership trends, the outcome is likely to reflect current travel trends, continued auto dependence, and increasing traffic congestion," and that they undermine current and planned investments in transit and active transportation.

We appreciate City Staff's understanding that "embedding auto dependency through land use policy, has a significant equity impact". The cost of mandated parking is a serious concern; a single underground parking space can cost more than \$100,000 per stall to construct, depending on soil, contamination, and groundwater conditions. This cost that is passed on to the purchaser or renter of the home and worsens the housing affordability crisis faced in Hamilton. In many cases, the additional cost of providing mandated parking results in smaller scale developments not being feasible, reducing housing supply potential, and worsening the housing crisis. WE HBA would encourage the City of Hamilton to take an in depth look at the City of Edmonton's approach to parking reform under an equity lens and assess why Hamilton should not fully eliminate parking requirements for most types of development.

WE HBA is increasingly hearing from our members that they are looking forward to the time at which Hamilton fully eliminates mandated parking minimums. It is important to note, removing parking

¹ "[Options for Travel: Giving Residents a Real Choice](#)", Bay Area Climate Change Council, 2022.

² "[Hamilton Burlington Parking Minimums](#)", Toronto Metropolitan University Planning Studio Project, April 2022.



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minimums does not mean no more parking will be built. Developers will continue to provide parking when needed to meet their consumer demand but will no longer be required to overprovide parking when the market dictates it is not necessary. Hamilton already has examples where builders have adjusted their parking provisions as part of their projects to address parking undersupply where it has been identified as a neighbourhood concern.

With rapid advances in technology ranging from ride sharing apps to autonomous vehicles in the future, WE HBA is concerned that significant capital will be spent in the coming years building underground parking facilities that will become stranded assets that will continue to have operational and maintenance costs embedded in rents and condo fees. WE HBA encourages the City to reconsider public policy that requires the construction of such facilities when it is not absolutely necessary.

Not only do parking mandates increase the cost of housing, but they can also reduce our overall housing supply potential—at a time when we need to dramatically increase it. If we are to address housing affordability and attainability, Hamilton should rethink mandated minimum parking requirements. As Hamilton seeks to increase transit options, promote sustainable transportation choices, and strive towards intensifying many areas of the City, the WE HBA encourages City staff and Council to further explore eliminating parking minimums city-wide.

The WE HBA will continue to provide education on the economic and social costs of parking to help further the conversation about parking minimum reform. As identified by City Staff, “it is not feasible to achieve [our] intensification and density targets while maintaining historical parking supply rates and a reliance on surface parking”. We look forward to participating in the upcoming consultation as a key stakeholder.

Sincerely,

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