

City of Toronto Review of Provincial Housing Affordability Task Force Recommendations

Date: March 16, 2022
To: Executive Committee
From: City Manager
Wards: All

SUMMARY

In December 2021, the Provincial government appointed a Housing Affordability Task Force (HATF) with a mandate to explore measures to address housing affordability and submit recommendations to the Minister of Municipal Affairs and Housing. On February 8, 2022, the Ontario Government published the *Report of the Housing Affordability Task Force* which included 55 recommendations for additional measures to increase the supply of market housing to address the housing crisis. Full text of the report is available at this link: <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>.

Media have reported that the Province intends to act on some of the recommendations prior to the provincial election on June 2, 2022, with new legislation to be introduced during the Spring 2022 legislative sitting¹.

The purpose of this report is to:

- provide City Council with an overview of the Housing Affordability Task Force's report, including potential implications of the report's recommendations to the City of Toronto should the Ontario Government act on them;
- highlight areas of City support and areas of concern that warrant reconsideration by the Ontario Government;
- provide an overview of actions the City is already taking that align with the direction of the HATF Report;
- request that City Council share City staff analysis as outlined in this report with key ministries of the provincial and federal governments; and
- seek City Council authorization to make submissions to the Ontario Government, if required, regarding any future legislative or regulatory provincial initiatives that may arise in connection with implementation of the Task Force's recommendations.

¹ Doug Ford's housing task force calls for more density, less public consultation; (CBC News, February 8, 2022)

The City of Toronto has demonstrated a strong commitment to the creation and development of affordable housing. Staff are concerned that many of the Task Force's recommendations may not deliver affordable housing but may result in diminished liveability for current and future Toronto residents.

RECOMMENDATIONS

The City Manager recommends that:

1. City Council endorse the general principle of legislative changes that advance opportunities to streamline the development approvals process to bring housing supply to the market faster, and in particular affordable housing, while concurrently ensuring other municipal objectives are met to achieve complete communities.
2. City Council forward a copy of the report (March 16, 2022) from the City Manager and City Council's decision to the Minister of Municipal Affairs and Housing and the Minister of Finance for their consideration in responding to the recommendations of the Housing Affordability Task Force.
3. City Council request that the Province provide for substantive consultation with the City of Toronto on any proposed legislative or regulatory changes arising from the recommendations in the Report of the Housing Affordability Task Force.
4. City Council authorize the City Manager, in consultation with the Chief Planner, the Executive Director Housing Secretariat, and the City Solicitor as appropriate, to provide comments to the Province on any proposed legislative or regulatory changes arising from the recommendations in the Report of the Housing Affordability Task Force, consistent with the positions noted in Appendix A to the report (March 16, 2022) from the City Manager.

FINANCIAL IMPACT

There are no financial implications arising from the recommendations in this report.

Some of the HATF report recommendations, if adopted by the Province, could reduce revenues generated from development for the City in the future. Staff will report to City Council on any such implications as necessary.

The Chief Financial Officer and Treasurer has reviewed and agrees with the Financial Impact Statement.

DECISION HISTORY

In March 2022, City Council confirmed affordable housing as the current priority focus for the Concept 2 Keys (C2K) Priority Development Review Stream, and authorized receipt of up to \$1,750,000 in funding from the Province's Streamline Development Approval Fund to assist in prioritizing affordable housing development applications for review:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2022.PH31.3>

In February 2022, City Council adopted Official Plan and Zoning Bylaw amendments to permit Garden Suites in the City of Toronto and directed that the current Affordable Housing Laneway Suites Program be expanded to include garden suites:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2022.PH30.2>

In February 2022, City Council approved an Official Plan Amendment and municipal by-law making pre-application consultation mandatory for development applications in the City of Toronto effective November 1, 2022, with a view to reducing statutory review timelines as provided for in Bill 108, the More Homes, More Choices Act, 2019:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2022.PH30.1>

In February 2022, City Council adopted Official Plan Amendments to delineate sixteen Protected Major Transit Station Areas (PMTSAs) in the Downtown Secondary Plan area and provide interpretation policies to guide the implementation of Major Transit Station Areas (MTSAs) and PMTSAs across the City. City Council also authorized staff to seek approval for these amendments from the Minister of Municipal Affairs and Housing:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2022.PH30.3>

In December 2021, City Council approved the implementation of a Vacant Home Tax of one percent tax of the current value assessment of the residential property on which the vacant unit is located, effective for the 2022 taxation year collectible in the following year, and directed that net Vacant Home Tax revenues (after deduction of program operating expenditures) be allocated towards affordable housing initiatives through the annual operating and capital budget approval process:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2021.EX28.2>

In December 2021, City Council adopted Zoning amendments to eliminate parking minimums:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2021.PH29.3>

In November 2021, City Council approved the Inclusionary Zoning Official Plan policies and Zoning By-law framework which will require certain developments to provide affordable housing contributing to creating mixed income communities across the city:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2021.PH28.1>

In September 2020, City Council endorsed the Housing and People Action Plan as a framework for prioritization of the City's Intergovernmental advocacy work on housing and homelessness over the next 24 months:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.PH16.8>

In July 2020, City Council endorsed the Expanding Housing Options in Neighbourhoods (EHON) Work Plan Report, including direction for staff to proceed with priority projects to increase permissions for additional residential dwelling units within currently permitted building envelopes in residential zones; other forms of low-rise housing in designated Neighbourhoods along Major Streets; and allowing garden suites, coach houses, through-lot suites and other forms of additional units in accessory buildings:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.PH15.6>

In December 2019, City Council adopted the HousingTO 2020-2030 Action Plan as the framework to guide the City's efforts over the next 10 years to strategically and effectively address housing and homelessness needs:

<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH11.5>

COMMENTS

Overview

The Housing Affordability Task Force's focus is that the lack of housing supply is the basis of Ontario's affordability crisis, and as such, its recommendations are aimed at bringing additional supply to the market over the next 10 years.

City staff support the direction of some of the key recommendations in the report that would support residential intensification and supply and potentially improve affordability. Of the 55 recommendations made, staff are supportive or supportive in principle of 29, partially supportive of 6, do not support 19, and had no position on 1. Support in principle for many of the recommendations is contingent on residential intensification being balanced with employment growth, consideration of the environmental and climate impacts from intensification, and the provision of and timing of infrastructure (both hard and soft) at both the municipal and provincial levels, to support intensification through a complete community lens. Appendix A provides staff's analysis of each individual recommendation; general commentary related to issues in the Task Force's report is provided below.

Additional Factors Affecting Housing Supply

The HATF report is heavily focussed on the role of municipal approvals, how these affect development, and the resulting effects on housing supply. The HATF report is focussed on how streamlining approvals would benefit affordability. The City of Toronto is committed to improving the development review process for applicants, staff, partners and the public. However, multiple additional factors not addressed in the Task Force report are also contributing to Toronto's crisis in housing affordability, beyond simply the municipal role and timing of approvals in the supply of housing. These include the effects of low interest rates, investor demand, net immigration and non-resident purchasers, blind bidding practices, and the price point of new housing supply compared to affordable supply. In addition, the number of housing units constructed does not necessarily correspond to the number approved. On average, the City approves +/- 28,000 residential units per year, but only +/- 15,000 get built.

Availability, access and affordability of housing is complex, requiring an all-of-government and all-of-community response. [Toronto's Housing Market Analysis](#), conducted in January 2019 to inform the [HousingTO 2020-30 Action Plan](#), found significant pressures in Toronto's housing and homelessness systems. On affordability, it noted that Toronto needs more supply of both market and affordable rental housing because:

- Renters are stuck in un-affordable homes, overcrowded conditions, and are waiting to own.
- There is a significant shortage of new purpose-built rental housing.
- The rental market is becoming more expensive, and middle-income households are priced out of the ownership market.

The City recognizes that additional economic factors (e.g. building industry capacity, supply chains, product and labour shortages and cost escalations, as well as holdback of land and units by land owners) are also contributing to the challenge of advancing housing supply and improving affordability. As such, action by all orders of government, as well as the private and non-profit sectors, is necessary to address the overall challenge.

Increasing Housing Supply in Toronto

The City is doing its part to build affordable and supportive housing, helping renters maintain housing, promoting new supply across the housing spectrum and creating incentives for growth. The City's strategies emphasize the importance of increasing rental opportunities. This includes the [Housing and People Action Plan](#), and the HousingTO Action Plan 2020-2030 which focus on broader measures to improve affordability and housing stability, particularly for renters and lower-income home owners.

The City has a number of programs underway to create and/or incent new housing supply:

Increasing the supply of affordable and supportive housing through a multi-faceted and targeted approach

- **Rapid Housing Initiative** - With federal capital funding and requested provincial operating funding and Ministerial Zoning Orders, the City can deliver new homes in months rather than years. New and enhanced investments are needed to respond to the ongoing housing and homelessness challenges.
- **Open Door Affordable Housing Program** - Helps accelerate affordable housing construction by providing City financial contributions including capital funding, development fee waivers and property tax relief, fast-tracking planning approvals, and activating surplus public land.
- **Housing Now** - Supports transit oriented development by unlocking City owned land near transit stations for market and affordable housing within complete communities.
- **Modular Housing Initiative** - A commitment (through the HousingTO Action Plan) to create 1,000 new modular homes in Toronto, to connect people experiencing homelessness with homes and appropriate supports to help them achieve housing stability.

Multi-Unit Residential Acquisition Program - A new program that seeks to secure existing affordable housing stock that is at risk of being permanently lost. It will also help improve housing stability for tenants.

Planning work to promote housing supply

- **Municipal Comprehensive Review of the Official Plan** – Currently underway to plan to accommodate the forecasted 617,000 people by 2051 anticipated by the Provincial Growth Plan for the Greater Golden Horseshoe. The city's growth is on track with these forecasts. This includes reviewing zoning permissions around transit stations to establish minimum density targets.
- **Inclusionary Zoning Implementation** - Will require 5-10% affordable housing, and by 2030 8-22% of affordable housing units to be provided in new developments alongside the development of market housing in defined areas of the City.
- **Delineations of Protected Major Transit Station Areas (PMTSAs) in Downtown** (adopted by City Council in February 2022) - To set minimum density targets for people and jobs, many of which far exceed the provincial targets, align with the Minister approved Downtown Plan, and would enable inclusionary zoning in support of City and Provincial policy objectives for achieving affordable housing upon approval of the PMTSA. In addition, the City is advancing 100+ additional PMTSAs setting in place the framework to enable Inclusionary Zoning to take place.
- **Growing Housing Options** - Permitting other housing options such as laneway suites and reviewing the [expansion of housing options in neighbourhoods](#) to facilitate more low-rise housing, to increase housing choice, and access and to create a more equitable, sustainable city.
- **Advancing the Community Benefits Charge Framework** – To be considered at City Council in 2022 with the intent to have a by-law passed by provincial timelines (September 2022).
- **Secondary Plan Studies** - Putting in place planning frameworks to support new growth and intensification including the Golden Mile Secondary Plan, the Downsview Secondary Plan, the Keele-St. Clair Secondary Plan; all examples of new planning frameworks to support intensification while engaging both communities and land owners.
- **Large Scale Transformations** - Intensifying development of transit nodes, such as in the [Christie's Planning Study area](#) (former Mr. Christie's factory site) and [Don Mills Crossing](#), which includes the Celestica Lands at Don Mills Road and Eglinton Avenue East.

Providing and putting in place incentives that may create new long-term supply and make housing more affordable.

- **Ongoing monitoring of short-term rental regulations**
- **The Home Energy Loan Program and Basement Flooding Subsidy Programs** - Expansion of existing support programs to make improvements to homes.
- **The Municipal Land Transfer Tax Rebate Program** - Continuing to assist qualified first-time home buyers.
- **Development Charge Deferral Program** - Continuing this program for non-profit home ownership, and other strategies such as identifying affordable housing that can benefit from property tax exemptions through Municipal Capital Facilities Agreements.

- **Continuing to provide property tax relief for qualifying residents such as low-income seniors and persons with disabilities.**
- **Vacant Home Tax** - adopted by City Council in December 2021, will be applied in 2022 with first payments coming in 2023.

Transforming the Development Review Process

Through the Concept 2 Keys initiative, the City is transforming how development applications are reviewed to reduce application processing times and enhance the consistency, transparency and predictability of the process.

Specific initiatives that address HATF recommendations include:

- **Priority Development Review Stream** - Established in 2020 to pilot a dedicated team-based approach to accelerating affordable housing approvals, the PDRS has reduced typical staff review timelines by approximately 40%. The PDRS is now a permanent function with dedicated staff and continues to drive the approval of affordable housing.
- **New Operating Model** - First piloted in the Etobicoke/York District, C2K is introducing a team-based model to application review. This will improve collaboration and promote joint prioritization among City Divisions, and allow for the rapid deployment of process and technology improvements as they become available.
- **Application Submission Tool/File Circulation Tool** - New technology is needed to simplify workflows, enhance collaboration and improve transparency of the development review process. In December 2021, the City's Application Submission Tool was launched to enable online intake of development applications. A digital File Circulation Tool is currently being developed to improve application circulation, commenting, resubmission and performance tracking.

Local Decision-Making and Complete Communities

The Task Force Report includes some recommendations that would remove local decision-making powers from City Council, reduce community engagement and lower design standards, and thus risk undermining the creation of complete communities. Several of the HATF recommendations would have significant impacts on local decision-making (e.g. #19: legislated timelines, #8: use of "as of right" zoning as a lever to move municipal zoning towards provincial density targets, #35: provincial review of development charge spending) and would, in the absence of other requirements, result in residential growth with no requirements for balancing growth against existing or planned infrastructure, infrastructure funding and timing of improvements or other impacts.

Other recommendations would eliminate or reduce community engagement which is an important avenue for public input (e.g. #12b: exempting projects of <10 units from public consultation and #13: limiting public meetings). The recommendations aim to reduce public participation and consultation in the planning process and in the appeals process and suggest increasing third party appeal costs, which would make it prohibitive for members of the public to participate. Reduction in community participation could lead to a lack of transparency and trust in the process made all the more important in order to

address issues and obtain buy-in from the community. Community input has frequently resulted in improved projects and better community outcomes.

Some of the recommendations could also reduce revenues generated by development (e.g. #32: waiving development charges and parkland cash-in-lieu); this would pose a risk to infrastructure development. Other recommendations with financial implications would be impractical to implement (e.g. #17: compensating property owners for heritage designations based on "highest and best use").

Staff are seeking more information from the Province on its approach to implementing any of the recommendations the Province may elect to advance. City staff would offer their expertise to any provincial tables established to implement the recommendations. Any draft legislation or regulations arising from the HATF report would require sufficient time for municipal and stakeholder consultation.

Need for "All of Governments" Approach

There is an opportunity to leverage some of the Task Force's recommendations, along with other recommendations from the municipal sector, to address housing affordability in Ontario in a comprehensive but targeted approach given the complexity of challenges. These include key actions for the federal, provincial and municipal governments, as well as the development sector, on collaboration and coordination, funding and incentives, improving outcomes for people, innovation, streamlining processes, and workforce development and the supply chain.

CONTACT

Gregg Lintern, Chief Planner and Executive Director, City Planning, 416.392.8772,
Gregg.Lintern@toronto.ca

Abigail Bond, Executive Director, Housing Secretariat, 416.338.1143,
Abigail.Bond@toronto.ca

Fahim Kaderdina, Chief of Staff, City Manager's Office, 416.392.4995,
Fahim.Kaderdina@toronto.ca

Karen Jones, A/Director, Intergovernmental and Agency Relations, 416.397.4429,
Karen.Jones@toronto.ca

Kerri Voumvakis, Director, Strategic Initiatives, Policy & Analysis, City Planning,
416-392-4148, Kerri.Voumvakis@toronto.ca

SIGNATURE

Chris Murray
City Manager

ATTACHMENTS

Appendix A: City of Toronto Staff Comments on Housing Affordability Task Force Recommendations

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#	Recommendation	Staff Comments
1.	Set a goal of building 1.5 million new homes in ten years	<p>Support in principle.</p> <p>As the report itself suggests, "affordable housing is a societal responsibility". The Province should include in this target a set-aside for affordable rental and ownership housing, including a range of housing types.</p> <p>It is unclear how many of the 1.5 million homes would be allocated to the GTHA. Would a significant share be assigned to farther outlying areas? How does this target line up with the Growth Plan forecasts? From a municipal servicing perspective, it would be helpful to have targets for each municipality, to assist in determining the level of impact on municipal infrastructure, services, and programs.</p>
2.	Amend the Planning Act, Provincial Policy Statement, and Growth Plans to set "growth in the full spectrum of housing supply" and "intensification within existing built-up areas" of municipalities as the most important residential housing priorities in the mandate and purpose.	<p>Support in principle.</p> <p>Support the general concept of intensification in built-up areas and the importance of housing within built-up areas.</p> <p>Residential intensification should not override other goals and objectives but be achieved in tandem. Residential intensification needs to be balanced with other key objectives including municipal capacity to support intensification and other key objectives such as access to employment and the development of more complete communities. Intensification must take into account other objectives, particularly in built up areas, to ensure the creation of complete sustainable communities.</p> <p>Recommendation related to "growth in the full spectrum of housing supply" needs to be clarified and should not be used as a basis to expand urban boundaries. In the December 6 provincial announcement of the appointment of the Task Force, a key point of the mandate included "Balancing housing needs with protecting the environment".</p>

#	Recommendation	Staff Comments
3.	<p>Limit exclusionary zoning in municipalities through binding provincial action:</p> <p>a) Allow “as of right” residential housing up to four units and up to four storeys on a single residential lot.</p>	<p>Support in part.</p> <p>The proposal is an overreach of provincial responsibility. While the province has the authority to set housing targets to be achieved by local municipalities, local municipalities share a responsibility to achieve those provincial targets reflective of local contexts.</p> <p>While gentle intensification aligns with a number of municipal plans it is unclear there is a direct correlation between increasing as of right permissions and affordability.</p> <p>a) Do not support provisions that strip municipalities of the ability to address provincial targets in a manner which reflects local context.</p> <p>Support in principle amendments to the Planning Act which would enable municipalities to implement 'as of right' residential housing' in a locally based, context-appropriate manner.</p> <p>Support in principle</p> <p>Support diversification of the housing stock based on municipal determination and municipal planning processes which would enable municipalities to establish performance standards.</p> <p>In the absence of zoning controls, municipalities would have limited tools to plan and service development, and as such, the opportunity to implement the concept should be reflected in the individual approach to be taken by municipalities.</p>
	<p>b) Modernize the Building Code and other policies to remove any barriers to affordable construction and to ensure meaningful implementation (e.g., allow single-staircase construction for up to four storeys,</p>	<p>Support in principle. Support continuous improvements.</p> <p>Staff are considering opportunities to make recommendations through the Ontario Building Code consultation currently underway.</p> <p>Updates to the building code could also consider parallel opportunities to address climate change resilience through improved building practices.</p>

#	Recommendation	Staff Comments
	allow single egress, etc.).	
4	Permit “as of right” conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use.	<p>Do not support, in the absence of additional information.</p> <p>The absence of details makes it difficult to understand the broad context of this recommendation. For example, where such lands exist within areas of employment, this would circumvent municipal Official Plan policies with respect to the conversion of lands within employment areas to non-employment uses circumventing the Municipal Comprehensive Reviews. Any such changes should occur through Municipal Comprehensive Reviews.</p> <p>As-of-right zoning should be supported where it adds to opportunity and vibrancy of communities and where it could be provided for through official plan policies that are supported by a municipality. Where conversions are permitted through municipal official plan policies, there should be restrictions on appeals that implement this municipal approach.</p> <p>Any such permission should be combined with necessary and concurrent revisions to the Building Code Act, 1992 and its regulations, and the Fire Protection and Prevention Act, 1997 and its regulations, to ensure continued public safety for all types of housing and building.</p>
5	Permit “as of right” secondary suites, garden suites, and laneway houses province-wide.	<p>Support.</p> <p>The City has enacted official plan and zoning permissions to enable these forms of housing.</p> <p>The Planning Act could be amended to enable municipalities to adopt policies to address local circumstances to implement 'gentle density', beyond the existing provisions for additional residential units in a detached house, semi-detached house or row house in the absence of appeals to the OLT.</p>
6	Permit “as of right” multi-tenant housing (renting rooms within a dwelling) province-wide.	<p>Support in principle.</p> <p>Multi-tenant houses are an important part of the affordable rental housing market, providing single-room accommodation to diverse communities, including students, seniors, new immigrants and low/moderate income residents.</p>

#	Recommendation	Staff Comments
		<p>Support the concept of a municipality's ability to implement multi-tenant housing, subject to meeting criteria such as human health and safety, established by each municipality through their zoning by-laws and licensing regulations.</p> <p>Support the concept of no appeals of municipal decisions on multi-tenant housing.</p> <p>While the City supports permitting multi-tenant houses as a form of housing, it is important the zoning standards be accompanied by enhanced operator licensing requirements, an enforcement and compliance program, initiatives to support tenants and maintain affordability of housing and a phased implementation plan, that are informed by municipalities.</p> <p>Continuous improvements should be combined with any necessary and concurrent revisions to the Building Code Act, 1992 and its regulations and the Fire Protection and Prevention Act, 1997 and its regulations to ensure continued public safety for all types of housing and building.</p>
7	Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children.	<p>Support in principle.</p> <p>Increasing density needs to be evaluated on the basis of a broad range of factors that comprise complete communities and infrastructure considerations.</p> <p>Secondary school positioning criteria needs to be enhanced to include mechanisms favouring sites with good transit access.</p> <p>The Ontario Government needs to fund existing schools in areas with low occupancy rates to ensure schools stay open as communities evolve and change over time, as the school may be required in the future particularly with increasing densities within neighbourhoods.</p>
8	Allow "as of right" zoning up to unlimited height and unlimited density in the immediate proximity of	<p>Do not support.</p> <p>The concept of "unlimited" height and density across the board is problematic. Proposal would amount to unplanned growth, and would not address the qualitative and quantitative components of increasing density.</p>

#	Recommendation	Staff Comments
	<p>individual major transit stations within two years if municipal zoning remains insufficient to meet provincial density targets.</p>	<p>Presupposes the adequacy of municipal infrastructure and community services to accommodate additional density making it challenging to undertake the necessary infrastructure planning to support the creation of new housing.</p> <p>The City is identifying MTSAs as part of its MCR. In the absence of a timely approval by the Province of MTSAs this would be an unrealistic timeline with respect to zoning.</p> <p>Lack of clarity as to what is meant by "insufficient" and who determines that?</p> <p>How / where would increase zoning be applied; i.e., in entirety of MTSAs (500 – 800 m) or in 'immediate proximity' of station area only? MTSAs include low density uses (e.g. recreation destinations) and intervening land uses that could make achieving targets unachievable in certain areas.</p> <p>Recommendation fails to address other key objectives that must accompany growth. Planning for growth around the MTSAs are based on long-range planning as set out by the province. To determine success or failure in 2 years disregards provincial timelines that municipalities are currently working towards.</p>
9	<p>Allow "as of right" zoning of six to 11 storeys with no minimum parking requirements on any streets utilized by public transit (including streets on bus and streetcar routes).</p>	<p>Support in principle.</p> <p>Support is subject to municipalities being able to implement reflecting local municipal conditions (e.g. surface routes that go into neighbourhoods vs. along arterials) and varying levels of public transportation service.</p> <p>Removing all parking requirements may negatively impact people with disabilities who rely on paratransit and may make servicing buildings more difficult.</p> <p>Reduced parking should be accompanied with mandatory requirements for car share (e.g. Commuauto) parking spots and secure bicycle/e-bike parking.</p>

#	Recommendation	Staff Comments
10	Designate or rezone as mixed commercial and residential use all land along transit corridors and redesignate all Residential Apartment to mixed commercial and residential zoning in Toronto.	<p>Support in principle.</p> <p>Lands considered as 'mixed commercial' may overlap with lands designated employment. Municipal Official Plan reviews and MCRs allow for municipalities to consider the introduction of residential uses on employment lands.</p> <p>This recommendation contradicts a policy-led approach to designate these lands through Municipal Official Plans and need to maintain employment lands, where appropriate and based on local circumstances, along some transit corridors.</p>
11	Support responsible housing growth on undeveloped land, including outside existing municipal boundaries, by building necessary infrastructure to support higher density housing and complete communities and applying the recommendations of this report to all undeveloped land.	<p>Do not support.</p> <p>Ongoing urban expansion into natural heritage or agricultural lands in the Greater Golden Horseshoe would be counter to the Growth Plan's goals and place a strain on the urban fringes and other goals related to building a more livable region. Implementing this recommendation would undermine long held Provincial policy goals and the orderly system of land use planning in Ontario.</p> <p>"Undeveloped land" should not include parkland.</p> <p>Additional infrastructure planning, legislative requirements and costs need to be addressed where supporting higher density housing and complete communities on undeveloped land, including outside existing municipal boundaries.</p> <p>Recommendation is unclear with regard to building of infrastructure – does this refer to both hard and soft infrastructure, linear and fixed, new and upgrades? There could be significant cost implications to this recommendation. If building infrastructure in advance of planned growth, how are costs to be recaptured? Is it expected that municipalities would front-end finance the cost of infrastructure?</p>
12	Create a more permissive land use, planning, and approvals system: a) Repeal or	<p>a) Do not support</p> <p>Over-stepping of municipal decision-making which takes into account local planned context.</p>

#	Recommendation	Staff Comments
	override municipal policies, zoning, or plans that prioritize the preservation of physical character of neighbourhood	The province has the authority to set housing targets to be achieved by local municipalities. Municipalities should have the responsibility of achieving those provincial targets in a manner that is appropriate to unique local contexts.
	b) Exempt from site plan approval and public consultation all projects of 10 units or less that conform to the Official Plan and require only minor variances	<p>b) Do not support.</p> <p>Eliminates municipalities' ability to review a number of important matters such as grading, environment and design.</p>
	c) Establish province-wide zoning standards, or prohibitions, for minimum lot sizes, maximum building setbacks, minimum heights, angular planes, shadow rules, front doors, building depth, landscaping, floor space index, and heritage view cones, and planes; restore pre-2006 site plan exclusions (colour, texture, and type of materials, window details, etc.) to the Planning Act and reduce or eliminate minimum parking requirements; and	<p>c) Do not support.</p> <p>Inconsistent with the concept of local planning. Does not take into consideration context, and as a result, would be a challenge to create.</p>
	d) Remove any floorplate restrictions to allow larger, more efficient high-density towers.	<p>d) Do not support.</p> <p>This would impact tower separation and sunlight to the public realm. No evidence that larger floorplates will ensure affordability.</p>

#	Recommendation	Staff Comments
13	Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.	<p>Do not support.</p> <p>Public information and engagement meetings are a best practice to ensure accurate information is shared with local communities and provide an opportunity for residents to ask questions and share comments. Public information and engagement meetings help to inform and educate the community at large on new approaches and changes.</p> <p>A cornerstone of good planning is providing an opportunity for a variety of voices to be heard. Consultation also provides a rich resource for understanding changing community needs. Limiting consultation would limit the capacity for change.</p>
14	Require that public consultations provide digital participation options.	<p>Support.</p> <p>Since the beginning of the COVID-19 pandemic, the City has been using digital platforms to engage with residents and will continue to improve its engagement processes to remove barriers to participation for those with limited access to Internet and digital devices.</p> <p>There is an opportunity for the Ontario Government to invest in standardized technology, training and other supports to implement virtual meetings and hybrid options post-pandemic, so that the public and applicants receive a consistent experience across the province.</p>
15	Require mandatory delegation of site plan approvals and minor variances to staff or pre-approved qualified third-party technical consultants through a simplified review and approval process, without the ability to withdraw Council's delegation.	<p>Support in part.</p> <p>Site plan approval is already delegated to the Chief Planner subject to conditions.</p> <p>Bill 13 provided the delegation of certain matters subject to municipal councils providing for such delegation. Municipal councils should continue to have this ability to determine which matters be delegated.</p> <p>Delegation could be extended to other processes which are administrative in nature, including exemptions from Part Lot Control and approvals under the Condominium Act, which Council may choose to delegate if they had the opportunity to make this determination.</p>

#	Recommendation	Staff Comments
		<p>More information is required regarding what the 'simplified review and approval processes would entail, and how qualified third party technical consultants would be pre-approved.</p>
16	<p>Prevent abuse of the heritage preservation and designation process by:</p> <ul style="list-style-type: none"> a) Prohibiting the use of bulk listing on municipal heritage registers b) Prohibiting reactive heritage designations after a Planning Act development application has been filed 	<p>Do not support.</p> <p>Implementation of this recommendation would undermine the intent and purpose of the Ontario Heritage Act. Heritage evaluations are rigorous, completed by staff or consultants who are professionals, and involve careful research and analysis.</p> <p>Unless a municipality has previously evaluated all properties to identify which properties have heritage value, developments can occur on sites that require a heritage evaluation, the results of which may recommend designation and conservation.</p> <p>The Ontario Heritage Act (as recently revised through Bill 108) includes statutory timeline limitations on when municipalities can designate a property following the submission of certain applications under the Planning Act. The Act also allows municipalities and owners to mutually extend timelines.</p> <p>The current legislation, which provides a mechanism for mutually agreed extensions allows for community consultation, rigorous research and evaluation, and for a collaborative approach to the conservation of heritage properties.</p>
17	<p>Requiring municipalities to compensate property owners for loss of property value as a result of heritage designations, based on the principle of best economic use of land.</p>	<p>Do not support.</p> <p>Unclear how this would work in practice. Implementation of this recommendation would not support the application of the Ontario Heritage Act. It also would likely lead to increased costs and complexity that would arise from disputes with regard to property value/appraisals/economic impact that would ultimately significantly increase the cost of heritage protection overall.</p> <p>Sets a potentially bad precedent. Planning and other decisions taken by all levels of government routinely impact property values. It is not the responsibility of</p>

#	Recommendation	Staff Comments
		<p>municipalities to preserve property values, but to provide for planned communities to the benefit of all citizens.</p> <p>Highest and best use is not solely based on economics. Would potentially create a financial barrier to protecting heritage, introducing mandatory financial compensation requirements could have unintended negative consequences such as weakening governments' ability to protect farmland by requiring landowners to be compensated using the same rationale.</p> <p>From a practical perspective, asserting any potential change in the value of a property because of a possible heritage designation would be speculative at best.</p>
18	Restore the right of developers to appeal Official Plans and Municipal Comprehensive Reviews	<p>Do not support.</p> <p>As proposed, this will extend timelines as a result of lengthy MCR appeals. This may create excess pressure to continue development without addressing capacity issues.</p> <p>Unclear as to how this would increase either affordability of housing supply or supply itself.</p> <p>This would create unnecessary time delays and financial burden on municipalities to defend provincial policy conformity matters that have been undertaken through extensive MCR exercises involving robust consultation with the development sector, other stakeholders, the public and the Province.</p> <p>The broad province-wide direction is inappropriate. If the stated purpose of this work is to expedite the creation of more housing supply, holding the Growth Plan and PPS implementing local policy frameworks for years at a time is counter to that purpose.</p>
19	Legislate timelines at each stage of the provincial and municipal review process, including site plan, minor variance, and provincial reviews, and deem an	<p>Do not support.</p> <p>Recommendation does not account for the delays in approvals created by applicants' delays in providing complete information or poor submissions or delays in responding to municipal requirements.</p> <p>Unclear how this would work in practice.</p>

#	Recommendation	Staff Comments
	<p>application approved if the legislated response time is exceeded.</p>	<p>The concept of "automatic approval" is concerning; a delay should not warrant site-plan approval.</p> <p>The City's Concept 2 Keys Program is already working on various process, technology, performance and governance initiatives that would seek to improve review timelines.</p> <p>System assessments and implementation of solutions (e.g. for water infrastructure) can require timelines that may not meet a legislated response time. It is appropriate for applicants to share responsibility to have a complete and acceptable submission.</p> <p>Support legislative timelines for provincial review process. Difficult for municipalities to advance implementing Secondary Plans or zoning by-laws if the province has not approved the Official Plan.</p>
20	<p>Fund the creation of "approvals facilitators" with the authority to quickly resolve conflicts among municipal and/or provincial authorities and ensure timelines are met.</p>	<p>Support in principle.</p> <p>Provincial creation of a fair and unbiased body to help mediate and resolve issues in a timely fashion would be beneficial.</p>
21	<p>Require a pre-consultation with all relevant parties at which the municipality sets out a binding list that defines what constitutes a complete application; confirms the number of consultations established in the previous recommendations; and clarifies that if a member of a</p>	<p>Support in part.</p> <p>Support pre-consultation. Toronto's Official Plan policies set out the pre-consultation process (essentially codifying current practices, as previously noted in Decision History).</p> <p>Regarding liability, unclear what the reference is to 'no additional stamp'. Would the Province work with Professional Engineers Ontario (PEO) to set guidelines/standards that are current and relevant to specific issues dealing with development and planning?</p> <p>Would there be mandated insurance requirements for these practitioners?</p>

#	Recommendation	Staff Comments
	regulated profession such as a professional engineer has stamped an application, the municipality has no liability and no additional stamp is needed.	How can an application be considered complete if not approved by an agreed-to professional body?
22	Simplify planning legislation and policy documents.	<p>Support in principle, subject to ensuring good practice is not eroded.</p> <p>Support simplification of Provincial Legislation and policy documents.</p> <p>Require additional information to understand what is specifically being referenced, Planning Act, Growth Plan, and Provincial Policy Statement.</p> <p>Staff also note the 2021 comments from the provincial Auditor which identifies the challenges faced by municipalities in continuously having to make changes in response to provincial legislative changes. This draws resources that municipalities could otherwise be deploying to the processing of housing applications.</p>
23	Create a common, province-wide definition of plan of subdivision and standard set of conditions which clarify which may be included; require the use of standard province-wide legal agreements and, where feasible, plans of subdivision.	<p>Do not support.</p> <p>Require clarification as to the standard set of conditions; each municipality and different applications' location and context requires tailored conditions that need to be addressed prior to development occurring, as this may create implementation challenges.</p> <p>In a complex built-up area such as the City of Toronto, conditions need to address challenges with encroachments, easements, areas with combined sewers and infill development and ensuring drainage in specific circumstances which a standardized province-wide agreement may not address.</p> <p>The feasibility of implementation of standard Province-wide legal agreements and plans of subdivision is questionable. Every area of Ontario has unique geography, building conditions, water and sewer supply,</p>

#	Recommendation	Staff Comments
		funding arrangements etc., and municipalities have varying degrees of complexity. This recommendation encroaches on municipal autonomy and decision making for matters within their jurisdiction.
24	Allow wood construction of up to 12 storeys.	<p>Support in principle.</p> <p>Support the increased use of low-carbon building materials (like wood/MASS timber). Municipalities will be responding to the Province's proposed amendments to the Building Code that would amend the Code to allow construction of 'tall wood' buildings using Encapsulate Mass Timber up to 12 storeys.</p>
25	Require municipalities to provide the option of pay on demand surety bonds and letters of credit.	<p>Do not Support.</p> <p>Most municipalities, including the City of Toronto, currently accept letters of credit or cash for security on development applications.</p> <p>Generally speaking, it has been demonstrated that surety bonds create an increased level of risk and difficulty for municipalities and they can be very hard to draw on. Letters of credit are proven effective and are a reasonable and straightforward mechanism to secure the undertaking of infrastructure works.</p> <p>More detail on the type of surety bonds being proposed and how they guarantee payment to the municipalities with no questions or time delays needs to be explained further.</p>
26	Require appellants to promptly seek permission ("leave to appeal") of the Tribunal and demonstrate that an appeal has merit, relying on evidence and expert reports, before it is accepted.	<p>Support in part.</p> <p>Support in principle the requirement for timely reasons in support of an appeal to prevent frivolous appeals. This could have merit if it were inclusive of developers to demonstrate that staff recommendation report, and subsequent decisions of Council was in some way contradictory of the Planning Act and other higher-order policy regimes.</p> <p>Do not support in totality, given that the nature of appeal may not necessitate the submission of expert reports. Additional clarity would be helpful.</p> <p>Develop criteria for third party appeals.</p>

#	Recommendation	Staff Comments
		<p>It is unclear as to the intent of this recommendation - is the intent to return to appeals being permitted only where there is non-conformity with a Provincial Plan, the Provincial Policy Statement or municipal official plan? In addition, the requirement to provide full expert reports prior to such "leave" being given may have a chilling effect on the actual implementation of the recommendation. It appears contradictory with several other recommendations made in this report.</p> <p>Any leave to appeal system would require significant resources on the part of the Tribunal and should be adequately funded in order to ensure administrative success.</p>
27	<p>Prevent abuse of process:</p> <p>27. a) Remove right of appeal for projects with at least 30% affordable housing in which units are guaranteed affordable for at least 40 years.</p>	<p>Support a) in principle.</p> <p>Definition of what is affordable requires clarification.</p> <p>If recommendation is adopted, the Province should also preclude appeals of a municipality's decision to approve additional density for the purpose of increasing the affordable housing stock. This could be accomplished by amending the City of Toronto Act to preclude appeals of these types of zoning bylaw amendments under section 34(19) of the Planning Act (in the context of COTA s. 453.1, which provides that lands can be rezoned to provide additional density, conditional on the lands being used for affordable housing purposes, where the lands are owned or leased by a non-profit).</p> <p>Threshold for no appeal should also be increased to a higher percentage of the total units.</p> <p>Unit types should be a criteria so that proponents come forward with 30% of units are not all studio suites. It should also be clarified that "affordable housing" in this recommendation means housing with rents that are at or below 80 percent of the average market value of the units within the municipality in question. This would be helpful given that the term "affordable housing" is generally used throughout the report to refer to affordable market rent units.</p>

#	Recommendation	Staff Comments
		<p>There is a risk that developers may initially propose 30% affordable housing only to revise the plan later on, simply to remove the right of appeal.</p>
	<p>27. b) Require a \$10,000 filing fee for third-party appeals.</p>	<p>Do not support b).</p> <p>It is unclear how this recommendation would work concurrently with recommendation 26, especially if expensive reports and a hefty filing fee are required.</p>
	<p>27. c) Provide discretion to adjudicators to award full costs to the successful party in any appeal brought by a third party or by a municipality where its council has overridden a recommended staff approval.</p>	<p>Do not support c).</p> <p>This would amount, to a significant extent, to further discouraging third parties from participating in a process that currently significantly impacts the public's ability to engage in the development of their community.</p> <p>The implementation of recommendations (b) and (c) are likely to have a chilling effect on public participation in the planning process – such a level of filing fee will dissuade or preclude those without means, who may have valid appeal ground, from participating and would have a significant effect on access to justice. In addition, council and its democratically elected councillors will feel increasingly bound to follow staff recommendations, even when they do not believe it is the best course of action for their constituents, in order to possibly avoid the risk of having to pay legal costs should they lose in a legal challenge.</p>
<p>28</p>	<p>Encourage greater use of oral decisions issued the day of the hearing, with written reasons to follow, and allow those decisions to become binding the day that they are issued.</p>	<p>Support in principle.</p> <p>In some complex decisions, written decisions are needed to reflect complexities in hearing outcomes. Easier to implement when the threshold of the decision is simple, not requiring additional conditions to be addressed before an Order is issued. It would be impractical to implement a decision that cannot be clearly and readily shared. Implementation of this recommendation would require clarity with regard to confirmation of the commencement of the period in which one could seek to challenge the decision. In addition, it is unclear if conditions would be released orally or only become binding (and a time clock start ticking) when the written reasons are released.</p>

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29	Where it is found that a municipality has refused an application simply to avoid a deemed approval for lack of decision, allow the Tribunal to award punitive damages.	<p>Do not support.</p> <p>Unclear of intent of recommendation. Require additional information to assess this proposal.</p> <p>Applications consistently contain incorrect, missing or inconsistent technical information that could lead to significant consequences if not addressed. In the absence of resolution of such matters a municipality may refuse the application in order to comply with legislated timelines. In these instances an approval recommendation may have been possible, but the legislated timeline does not allow for an iterative process to solve these issues.</p> <p>The Tribunal should not be permitted to award punitive damages. There may be many reasons why a municipality has not made a decision with a specified timeframe. A hearing at the Tribunal should be not used to punish municipal councils.</p>
30	Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets.	<p>Support in principle.</p> <p>Funding to increase Ontario Land Tribunal staffing for quicker outcomes could lead to better resolution of appeals and lead to the potential to bring housing supply to market quicker.</p> <p>More OLT staffing that is also directed to hearing matters of City initiated matters could lead to better outcomes and less delays in advancing new planning frameworks including those that address affordable housing.</p>
31	In clearing the existing backlog, encourage the Tribunal to prioritize projects close to the finish line that will support housing growth and intensification, as well as regional water or utility infrastructure decisions that will	<p>Support in principle.</p> <p>Prioritization should include both projects and policies that include affordable housing and amendments which are municipally initiated and appealed.</p> <p>However approval does not mean the development will be built. Limitations on advancing new applications on lands within a set timeframe would provide for better use of municipal and OLT resources as it would curtail the ability of a property to undergo multiple applications related to the site. This may also contribute to a site proceeding to be constructed and occupied addressing housing supply.</p>

#	Recommendation	Staff Comments
	unlock significant housing capacity.	
32	Waive development charges and parkland cash-in-lieu and charge only modest connection fees for all infill residential projects up to 10 units or for any development where no new material infrastructure will be required.	<p>Do not support.</p> <p>Proposal requires further analysis and individual municipal approaches. Municipalities may elect to exempt or defer DC for certain initiatives. In general, Development Charges facilitate construction of growth related infrastructure. Waiving them would put the burden on another funding mechanism (i.e. result in a revenue shortfall and shift growth costs onto existing homeowners).</p> <p>Full cost user pricing to include new infrastructure for growth in lieu of development charges translates into municipalities providing all of the upfront financing and carrying the costs of the new infrastructure. By extension, this means ratepayers assume all of the risk of growth for little or no benefit. Need clarification on the definition of "no new material infrastructure". Difficult to interpret and could result in appeals and delays.</p> <p>What is a "modest" connection fee – municipalities are required to establish fees and charges through the Municipal Act, 2001 and case law has clearly provided that there must be a rational connection between the cost of providing the service/item and the charge – if the "modest" charge is lower than the actual cost of providing the service/item where will the money to make up the difference come from for municipalities?</p>
33	Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.	<p>Support in principle, at municipal discretion.</p> <p>Municipalities should retain the ability to waive development charges, building permit fees, planning application fees, park-land dedication fees and municipal taxes for affordable and supportive housing projects.</p> <p>Require more information on the definition of affordable (e.g. is it the PPS definition of affordable housing, which defines affordable as the lower of an income based measure and average rent or sale prices -- depending on tenure)?</p>

#	Recommendation	Staff Comments
		<p>Inclusionary Zoning units should not be given exemptions.</p> <p>It is not clear how municipalities could guarantee affordability for 40 years. What are the tools and mechanisms to evaluate affordability and ensure that units remain affordable for the 40 year time frame?</p>
34	<p>Prohibit interest rates on development charges higher than a municipality's borrowing rate.</p>	<p>Do not support.</p> <p>Concerns with potential funding gap if applying this rate for DC freeze. Construction costs have increased at a higher rate than the City's cost of borrowing.</p> <p>DC instalments have collection risks, as municipalities do not have authority to register agreements on title; interest rates should reflect this risk.</p>
35	<p>Regarding cash in lieu of parkland, s.37, Community Benefit Charges, and development charges:</p> <p>a) Provincial review of reserve levels, collections and drawdowns annually to ensure funds are being used in a timely fashion and for the intended purpose, and, where review points to a significant concern, do not allow further collection until the situation has been corrected.</p> <p>b) Except where allocated towards municipality-wide infrastructure projects, require municipalities to spend funds in the</p>	<p>Do not support.</p> <p>a) Cities publish annually to Treasurer's statements for the Development Charges reserve funds, Park Dedication reserve fund and Public Benefit reserve fund in accordance with applicable provincial legislation. The information includes the description of the service, opening and closing fund balances for the year, the annual amount and source of fund and transactions relating to that year.</p> <p>b) Amounts to jurisdictional overreach, and would impact a municipality's ability to prioritize funding based on local needs, specifically for growth related needs that may cross local boundaries. Municipalities should have flexibility to decide.</p> <p>In some cases, funds need to be accumulated over time to support the full costs of the benefiting capital investments. Most reserve balances are committed and allocated through the municipality's 10-Year Capital Plan against eligible capital projects based on timing of expected project completion. DC reserve fund balances are deducted from DC rate calculations.</p> <p>The new CBC requires funds to be allocated or spent annually; S42 reserve fund status reports summarize or otherwise describe use/allocation of reserve funds.</p>

#	Recommendation	Staff Comments
	<p>neighbourhoods where they were collected. However, where there's a significant community need in a priority area of the City, allow for specific ward-to-ward allocation of unspent and unallocated reserves.</p>	<p>DCs are very prescriptive in nature and can only be used for capital infrastructure needs. Municipalities are not able to charge more than the cost of the infrastructure required to support growth. If a municipality has large reserves, it is because the DCs collected accumulate until the infrastructure project proceeds.</p> <p>"Use" of funds is unclear. Spend or allocate consistent with current S37 (CBC) legislation? If so, the City already meets this criteria (60% spent or allocated).</p> <p>b) Further clarity required. How are significant community needs defined? How to balance/or respond to stakeholder defined needs (i.e. Councillor/community, etc.) versus City Council/Committee/Divisional needs? How does this relate to the price of housing?</p> <p>Parks and recreation are planned as systems - addressing existing system gaps in low-growth areas is required to support high-growth areas in some cases.</p> <p>How to address needs of equity-deserving communities not experiencing significant growth?</p> <p>Restriction on use of development charges may result in infrastructure required to support growth to be paid for by general rate or tax.</p>
36	<p>Recommend that the federal government and provincial governments update HST rebate to reflect current home prices and begin indexing the thresholds to housing prices, and that the federal government match the provincial 75% rebate and remove any clawback.</p>	<p>No position.</p> <p>This provision could better serve the objectives of the HATF if some portion of HST revenue was specifically diverted to support purpose built rental and affordable housing.</p>

#	Recommendation	Staff Comments
37	Align property taxes for purpose-built rental with those of condos and low-rise homes.	<p>Support in principle.</p> <p>Toronto has had the New Multi-Residential Tax rate in place since 2002, which applies the same property tax rate for new purpose-built rental as Residential properties (condos). The ability should be extend provincially.</p> <p>The ratio to the residential rate for older multi-residential properties has been decreasing substantially over the last few years. Aligning all multi-residential rates to the residential rate would result in substantial shift of tax burden to the residential class.</p>
38	Amend the Planning Act and Perpetuities Act to extend the maximum period for land leases and restrictive covenants on land to 40 or more years.	<p>Support in principle.</p> <p>Uncertain as to the effect. It is not clear why this recommendation exceeds the 40 year threshold set out in other recommendations.</p>
39	Eliminate or reduce tax disincentives to housing growth.	<p>Do not support without further detail.</p> <p>Unclear by what is meant by tax disincentives, or how this would be practically implemented.</p>
40	Call on the Federal Government to implement an Urban, Rural and Northern Indigenous Housing Strategy.	<p>Support.</p> <p>Ensure there is meaningful consultation with First Nations, Metis, and Inuit Peoples and Communities.</p>
41	Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.	<p>Support in principle.</p> <p>The City, through the HousingTO Plan, has a target of approving 4,000 affordable ownership homes by 2030 and will also continue to seek federal and provincial investments to deliver new affordable homeownership opportunities.</p> <p>The City will be working with a number of affordable housing organizations that are interested in providing homeownership opportunities for racialized, equity-deserving communities such as Indigenous Peoples and Black people, as a way to address long-standing</p>

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		<p>inequities. The city welcomes funding opportunities from the Provincial government to support these efforts.</p> <p>In addition to these actions, it is anticipated that upon Provincial approval of the City's requested PMTSAs the number of affordable homeownership opportunities across the city may increase through implementation of the City's proposed Inclusionary Zoning policy.</p> <p>City Council recently adopted a new definition of affordable ownership housing which would enable more households to afford ownership upon its adjudication at the OLT.</p>
42	Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects.	<p>Support in principle.</p> <p>Review to be required for the conditions of loans, not for Municipalities and not for-profit.</p>
43	Enable municipalities, subject to adverse external economic events, to withdraw infrastructure allocations from any permitted projects where construction has not been initiated within three years of build permits being issued.	<p>Support in principle.</p> <p>This could prevent land owners from not activating site plan and zoning approvals. This may also allow for better planning and managing of servicing capacity. Recommendation should be broadened to include draft plans of subdivision, condominiums and site plans.</p> <p>Unactioned approvals generally do not occur after building permits issued, rather on zoning and site plan approvals that are not actioned by the land owner.</p> <p>Need clarification on the definition of ""adverse external economic events"", in case of disputes with developer on withdrawing allocations. Also need clarity regarding what happens to a development approval when an allocation is withdrawn.</p>
44	Work with municipalities to develop and implement a municipal services corporation utility model for water and	<p>Do not support.</p> <p>Unclear how this could support growth related projects versus DCs, and what the planning and administrative implications would be.</p>

#	Recommendation	Staff Comments
	wastewater under which the municipal corporation would borrow and amortize costs among customers instead of using development charges.	<p>There are many variables that drive municipal water servicing costs up or down such as raw water quality, distance of supply to the consumer, number of connections to a system etc.</p> <p>Municipal development charges models are effectively able to ensure that growth pays for growth. Using a utility model for water and wastewater could place billions of dollars of infrastructure costs on the property tax and utility ratepayers, which may create new affordability challenges for residents and businesses.</p> <p>No aspect of this recommendation, if implemented, should be mandatory for any particular municipality. Full cost user pricing to include new infrastructure for growth in lieu of development charges translates into municipalities providing all of the upfront financing and carrying the costs of the new infrastructure. By extension, this means ratepayers assume all of the risk of growth for little or no benefit.</p> <p>DCs are used to help ensure that capital costs for providing services related to new growth are paid by those that benefit from the infrastructure. The absence of or reduction to development charges DCs will not have a measurable impact on housing prices, while resulting in higher property taxes. Higher property taxes in turn would affect housing and business affordability which would be counter to the goal of more affordable housing options.</p>
45	Improve funding for colleges, trade schools, and apprenticeships; encourage and incentivize municipalities, unions and employers to provide more on-the-job training.	<p>Support.</p> <p>One impediment to the delivery of housing is the capacity of the industry to advance approvals in a timely fashion. This recommendation should apply to Province as well – there are many opportunities in both the provincial and municipal sectors to provide on the job training and career encouragement for a wide range of professions to support the creation of affordable housing.</p> <p>This recommendation could be amplified by investments to increase the capacity of local employment service providers to assist clients interested in skilled trades' pathways as entry level employees or as career changers.</p>

#	Recommendation	Staff Comments
		Further investments are needed in the employment and workforce planning system to improve local labour market information on supply and demand, and to improve online apprenticeship services and tools for employers and apprentices.
46	Undertake multi-stakeholder education program to promote skilled trades.	<p>Support.</p> <p>Opportunities should be advanced at the high school level to ensure opportunities for students to better understand job opportunities in the skilled trades.</p> <p>It may be important to increase the awareness of the skilled trades pathway with educators and parents even sooner, starting in the late elementary school level (i.e. grades 7,8) so that students can better plan for high school and identify potential post-secondary pathways that could involve the skilled trades.</p>
47	Recommend that the federal and provincial government prioritize skilled trades and adjust the immigration points system to strongly favour needed trades and expedite immigration status for these workers, and encourage the federal government to increase from 9,000 to 20,000 the number of immigrants admitted through Ontario's program.	<p>Support in principle.</p> <p>It is important that Canada's immigration system supports industries with critical labour force needs, which includes addressing the skilled trade shortages in the residential construction sector.</p>
48	The Ontario government should establish a large "Ontario Housing Delivery Fund" and	<p>Support in principle.</p> <p>The proposed priorities and associated metrics are very open-ended.</p>

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	<p>encourage the federal government to match funding. This fund should reward: a) Annual housing growth that meets or exceeds provincial targets b) Reductions in total approval times for new housing c) The speedy removal of exclusionary zoning practices.</p>	<p>There are many variables such as planning, environmental, political and developer interest that can impact supply which are outside of a municipality's control. Municipalities could do everything in their power and still not influence meeting these metrics. A realistic understanding of the limits of the role of the municipality needs to be considered.</p> <p>Would the 'reward' be equal to or offset a reduction in DC for infrastructure? If adequate, the funding may help offset some pressures on adding capacity for housing.</p> <p>In looking at the scale of this fund, consider off-setting administrative costs to implement transformative recommendations proposed throughout the report and any other fiscal impacts.</p>
49	<p>Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.</p>	<p>Do not support.</p> <p>Municipalities do not control whether housing units are built. This is evidenced by the number of approved but unbuilt units within the City that have yet to be activated by the applicant. Any performance metrics should be based on approvals, not units built. Consideration must also be given to the greater complexities inherent to applications in large, mature urban areas such as Toronto.</p> <p>It is not clear what funding would be reduced. Reduction in funding to municipalities that fail to meet provincial housing growth and approval targets should not be implemented if the municipalities have reasonable explanations as to why such delays exist. There are many variables that can contribute to delay in meeting such targets including planning, environmental, political, administrative and emergency reasons.</p>
50	<p>Fund the adoption of consistent municipal e-permitting systems and encourage the federal government to match funding. Fund the development of common data</p>	<p>Support.</p> <p>The City (through Concept 2 Keys) is already in discussions with RESCON and OneOntario regarding piloting a data standard with them. The City has also included a clause in our NRFP that would allow other municipalities to use our vendor.</p> <p>Consistent technology province wide would allow for the province to provide greater support to municipalities, and</p>

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	<p>architecture standards across municipalities and provincial agencies and require municipalities to provide their zoning bylaws with open data standards. Set an implementation goal of 2025 and make funding conditional on established targets.</p>	<p>provide for a more consistent experience for applicants, thereby enhancing the efficiency of the review process. The Province is best positioned to mandate one system/data standard for all.</p> <p>Making transformational shifts to IT and data management by 2025 represents an ambitious target that would require substantial administrative effort to meet.</p> <p>Recommendation does not directly address building approvals. However, any implementation, or adoption of the recommendation should be monitored for potential impact.</p>
51	<p>Require municipalities and the provincial government to use the Ministry of Finance population projections as the basis for housing need analysis and related land use requirements.</p>	<p>Do not Support.</p> <p>Contrary to the Growth Plan.</p> <p>The Ministry of Finance population projections are revised more frequently than the Growth Plan which may pose challenges for municipalities in frequently changing targets. As an alternative, municipalities could be required to plan for the high estimates associated with the Growth Plan.</p> <p>If projections are unsound then infrastructure cannot be appropriately planned. How would the ministry project 'unlimited' density?</p> <p>How would this work for Masterplans and Development Charges that rely on Official Plan projections? This would make planning for growth difficult.</p> <p>Changing this at this moment when municipalities have already seen substantial changes impacting municipal comprehensive reviews would be inappropriate. See Auditor's report from late 2021.</p>
52	<p>Resume reporting on housing data and require consistent municipal reporting, enforcing compliance as a requirement for accessing programs</p>	<p>Support in Principle.</p>

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	under the Ontario Housing Delivery Fund.	
53	Report each year at the municipal and provincial level on any gap between demand and supply by housing type and location, and make underlying data freely available to the public.	<p>Support in Principle.</p> <p>Could be supported on 3-5 year reporting basis provided Province provides clarity on standardized data reporting metrics and also provides funding for a standardized municipal data collection and monitoring system.</p> <p>It will be critical to evaluate what the ‘right’ information is to be monitoring and reporting, in terms of controllability by the municipality (e.g. Accuracy of information received impacts ability to achieve legislative timelines).</p> <p>Core housing needs is a critical data point to help the province, municipalities, and the development industry prioritize.</p>
54	Empower the Deputy Minister of MMAH to lead an all-of-government committee, including key provincial ministries and agencies, that meets weekly to ensure our remaining recommendations and any other productive ideas are implemented.	<p>Support in principle.</p> <p>Meetings could be held on a monthly or as needed basis and should include municipal representatives, including the City of Toronto.</p>
55	Commit to evaluate these recommendations for the next three years with public reporting on progress.	<p>Support in principle the concept of review of the recommendations that are implemented.</p> <p>Ensure the review involves meaningful municipal consultation.</p>