

Document 1 – Detailed Comments on the Ontario Housing Affordability Task Force’s 55 Recommendations

Task Force Recommendation	Comments	Recommended City Position
<i>Focus on getting more homes built</i>		
1. Set a goal of building 1.5 million new homes in ten years.	This is an incredibly ambitious goal. Local concerns are based on the capacity of the construction sector to ramp up production.	The City has no position on this.
2. Amend the <i>Planning Act</i> , Provincial Policy Statement (PPS) 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	Provincial Policy Statement 2020 already contains policies on housing supply, range of unit types, and accommodating residential growth in Section 1.4. These policies are frequently relied on when dealing with intensification. Stronger language elsewhere in the Provincial Policy Statement that reinforces these objectives or gives them priority would be welcome.	The City has no concerns since we feel this is not meaningfully different than the existing Provincial Policy Statement.
3. Limit exclusionary zoning in municipalities through binding provincial action: a) allow as of right residential housing up to four units and up to four storeys on a single residential lot; b) Modernize the Building Code and other policies to	The New Official Plan sets ambitious targets for intensification in Tables 3a (“Hubs, Mainstreets and Protected Major Transit Station Area (PMTSA) Density and Large Dwelling Requirements”) and 3b (“Neighbourhood and Minor Corridor Residential Density and Large Dwelling Targets”). These targets,	The City supports the intent of the proposal and has taken up this challenge in adopting our new Official Plan. The City does not see the need for the province to impose a solution on municipalities, but further clarity in direction and the Provincial Policy Statement would be appropriate.

<p>remove any barriers to affordable construction and to ensure meaningful implementation (e.g., allow single-staircase construction for up to four storeys, allow single egress, etc.).</p>	<p>together with Policy 3.1 (Support Intensification) will make exclusionary zoning difficult to support going forward. The New Official Plan also includes policies that support a shift to form-based zoning and a mixture of typologies (Section 4.2.1), as well as policies to protect the existing rental housing supply (Section 4.2.3). Taken together, the New Official Plan supports multi-unit forms in all residential areas.</p>	<p>The City has no concerns with new options for housing construction being introduced into the Building Code.</p>
<p>4. Permit as of right conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use.</p>	<p>The City already designates many commercial areas as mixed use. Where this has not been done, there is usually a land use compatibility concern with adjacent land uses.</p>	<p>The City has no concerns with this proposal, provided there are appropriate checks and balances to address land use compatibility between sensitive land uses and industrial uses that may be adjacent.</p>
<p>5. Permit as of right secondary suites, garden suites, and laneway houses province-wide</p>	<p>The City already has broad permissions that match this recommendation. In accordance with Section 16(3) of the <i>Planning Act</i>, secondary dwelling units and coach houses are listed as Generally Permitted Uses in Section 3.1 of the existing Official Plan. Sections 133 (Secondary Dwelling Units) and 142 (Coach Houses) of Zoning By-law 2008-</p>	<p>The City has no concerns with this recommendation.</p>

	<p>250 implement this policy.</p> <p>The New Official Plan carries over this permission in Policies 4.2.1 (Enabling greater flexibility and an adequate supply and diversity of housing options throughout the City).</p>	
<p>6. Permit as of right multi-tenant housing (renting rooms within a dwelling) provide-wide.</p>	<p>The City already has broad permissions that match this recommendation. “Rooming Units” are broadly permitted in the Zoning By-law.</p> <p>The New Official Plan Policy 4.2.3 (Protect Existing Rental Housing Stock and Support the Production of more Rental Units) prohibits amendments that would result in a net loss of rooming units in a particular area.</p> <p><u>Nevertheless, some controls related to rooming units are required to protect tenants and ensure compliance with the City’s Licensing By-law 2002-189.</u></p>	<p>The City supports the intent of this recommendation, but there needs to be checks and balances to prevent excessive numbers of units in buildings without the proper amenities and municipalities still need some zoning controls.</p>
<p>7. Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children.</p>		<p>The City has no concerns with this recommendation.</p>

Align investments in roads and transit with growth

<p>8. Allow as of right zoning up to unlimited height and unlimited density in the immediate proximity of individual major transit stations within two years if municipal zoning remains insufficient to meet provincial density targets.</p>	<p>The New Official Plan designates 26 Protected Major Transit Station Areas and includes density targets for people, jobs and units per hectare. The height direction in the Official Plan for these areas vary based on local context. Further, building heights in the downtown core and inner urban Protected Major Transit Station Areas must still respect central views of Parliament.</p>	<p>The City supports direction for more height at transit stations but the ultimate decision should be made locally, <u>taking into account site-specific constraints.</u></p> <p><u>The City also supports direction for more density in Protected Major Transit Station Areas, as it would help optimize the use of inclusionary zoning, once implemented.</u></p>
<p>9. Allow as of right zoning 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>The wording “any streets utilized by public transit” in the recommendation is very broad and could include many neighbourhood streets utilized by individual bus routes where six to 11 storeys is not appropriate. The New Official Plan generally allows taller buildings and greater density near “frequent” street transit.</p> <p>Otherwise, this language most aligns with the City’s minor corridor, mainstreet, and hub designations. The New Official Plan Table 7 (“Minimum and Maximum Height Overview Based on Official Plan Policy”) generally sets a maximum height of four storeys for Minor Corridors across the City, while</p>	<p>The City believes this should be a local decision by Councils and not provincially-imposed. However, stronger language in the Provincial Policy Statement supporting more height in areas well served by transit is reasonable.</p>

	Mainstreets allow for heights up to 40 storeys depending on local context. Hubs have the greatest height permissions across the City, with a maximum of 40 storeys everywhere except the Downtown Core, where even greater heights are permitted.	
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.	This does not apply to Ottawa.	The City has no comment.
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.	The City is not clear what this recommendation means.	The City does not agree with changes to the existing growth management regime in the Provincial Policy Statement.
<i>Start saying “yes in my backyard”</i>		
12. Create a more permissive land use, planning, and approvals system:	The City appreciates the issues that come with trying to define and preserve “character” in individual neighbourhoods, but	The City does not agree with a complete override of these tools. Rather, the focus should be on removing barriers to

<p>a. Repeal or override municipal policies, zoning or plans that prioritize the preservation of physical character of neighbourhood</p>	<p>suggests that a more balanced approach is required. The City has introduced several zoning tools, such as the Streetscape Character Analysis and the Mature Neighbourhoods Overlay, to ensure that new development of any size is compatible with the surrounding neighbourhood context.</p> <p>It is not clear whether this recommendation would repeal or override Heritage Conservation District Plans. The conservation of heritage resources is vital to creating sustainable, vibrant, livable communities. There are 21 Heritage Conservation Districts designated under Part V of the <i>Ontario Heritage Act</i> in Ottawa, most of which have Heritage Conservation District Plans or other guideline documents that recognize the cultural heritage value and attributes of these areas as well as provide guidance for alterations and new construction. These documents do not prioritize neighbourhood character over new housing and are aligned with growth direction in Secondary Plans and the Official Plan. These plans contemplate growth and change in the Heritage Conservation</p>	<p>modest intensification while retaining qualities people value such as room for trees, attractive streetscapes, and compatible building forms.</p> <p>Individual municipalities are in the best position to identify which of their tools are working and which are being used as barriers to intensification. The City believes that intensification can be achieved while preserving character.</p>
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	<p>District such as additions, new construction and infill, and are not concerned with use or number of units. They provide a roadmap for the creation of new housing that also recognizes the unique sense of place that makes these neighbourhoods special. It is unclear whether this recommendation would also extend to repealing designation by-laws under the <i>Ontario Heritage Act</i>.</p>	
<p>b. Exempt from site plan approval and public consultation all projects 10 units or less that conform to the Official Plan and require only minor variances.</p>	<p>The City's Site Plan Control By-law 2014-256 exempts certain forms of residential development from needing Site Plan Approval, including developments with up to 6 units where conditions are met. For larger infill, Site Plan Approval provides the opportunity to address matters such as drainage, exterior materials, landscaping, parking and waste management.</p> <p>The City does deal with routine complaints about drainage impacts, <u>for example</u>, from infill development and needs a tool to <u>manage this issue</u>.</p> <p><u>In inner-urban low-rise apartment zones (R4) in particular, Site Plan Control currently addresses these issues where other tools are not</u></p>	<p>The City has no objection to this proposal provided that the City is given some other regulatory tool to manage <u>common site-plan issues, such as urban drainage, parking, landscaping and/or screening and waste management</u>.</p>

	<p><u>currently in place to do. This gives us the opportunity to detect and address adverse impacts on abutting properties, that can be identified during consultation or technical review. Removing entirely the City's discretion to apply Site Plan Control up to ten units would be premature in Ottawa.</u></p>	
<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 <i>Planning Act</i> and reduce or eliminate minimum parking requirements;</p>	<p>Most zoning standards are context-specific, best left to be determined, amended, and enforced by each municipality. Several of the standards listed, such as allowing up to 4 storeys on any residential lot, could directly impact the compatibility, sustainability and livability of new infill and greenfield housing, and their standardization may erode relationships between new and existing residents, developers, and the City. Most standards are better addressed at the neighbourhood scale, accounting for local context and area-specific planning goals identified in the Official Plan. For example, Ottawa has established considerations related to views of Parliament in the Central Area which need to be considered when determining appropriate built</p>	<p>Staff have concerns regarding the recommendation for province-wide zoning standards, as this approach does not allow for context-specific regulations that are tied to the City's Official Plan. Staff could support Provincial requirements that preserve local discretion while placing restrictions on the ability of by-laws to unreasonably limit density and diversity of housing supply, as well as the removal of minimum parking requirements for certain classes of development. The City would welcome the opportunity to work with the province on a mutually-agreeable framework.</p> <p>Staff also have concerns with restoring pre-2006 site plan exclusions, as having an opportunity to comment on building design and quality</p>

	<p>form.</p> <p>However, Provincial guidance on certain zoning standards that preserves local contextual flexibility while limiting the passage of zoning rules that have the effect of restricting housing choice and opportunity could provide a helpful base of support for local zoning efforts to increase housing supply, density and diversity within neighbourhoods.</p>	<p>has direct benefits for the public realm and city image.</p>
<p>d. Remove any floorplate restrictions to allow larger, more efficient high-density towers.</p>	<p>Urban Design Guidelines for High-Rise Buildings approved by Council in May 2018 provide non-binding direction for achieving appropriate high-rise development, including floor plate size. The Guidelines are applied contextually during the review of development applications to ensure that new high-rise buildings are compatible with the surrounding context, create attractive public spaces by contributing to the skyline, respond to the physical environment and microclimate, and offer long term livability for residents through reasonable provision of natural light, fresh air, and views. Removing floor plate restrictions entirely could result in high-rise development that does not meet these</p>	<p>The City supports more discussion Province-wide about appropriate flexibility in design but does not support outright prohibition on using this tool.</p>

	<p>objectives. The City's New Official Plan supports high-rise development with small floor plates but also provides opportunities and clarifies conditions when larger floor plates could be appropriate, such as when there are increased separation distances between high-rise towers. Removing floor plate restrictions entirely could adversely impact the quality of life for all, limiting the overall development potential in a community while maximizing the potential on one lot.</p>	
<p>13. Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the <i>Planning Act</i>.</p>	<p>The City acknowledges that public meetings can add more time to a process, but they are often required to address valid issues.</p>	<p>Rather than eliminate these meetings, the City suggests the Province consider giving appeal rights if the request is unreasonable.</p> <p>The City continues to see the value in public consultation, <u>such as achieving design compromises for compatibility or more community benefits.</u></p>
<p>14. Require that public consultations provide digital participation options</p>		<p>The City supports this proposal.</p>
<p>15. Require mandatory delegation of site plan approvals and minor variances to staff or pre-</p>	<p>City Staff already have delegated authority to approve or refuse site plan control under certain circumstances (i.e.</p>	<p>The City supports delegated authority but does not support that it be mandatory.</p>

<p>approved qualified third-party technical consultants through a simplified review and approval process, without the ability to withdraw Council's delegation</p>	<p>Councillor approval). However, there is value to more complex or controversial applications being heard by Council. Further, it is not clear whether a different third-party approval body for minor variances would introduce efficiencies.</p>	<p><u>Engagement with the local Councillor and the public can, in many instances, add value to the development and build trust.</u></p>
<p>16. Prevent abuse of the heritage preservation and designation process by...</p>	<p>The City does not believe that there is "abuse of the heritage preservation and designation process" in Ottawa, and the report does not provide clear evidence of widespread abuses that are impacting the provision of housing in Ontario. Since the City of Ottawa began listing properties under Section 27 of the <i>Ontario Heritage Act</i> in 2014, 39 notices of demolition have been received and none of these buildings have been designated. In its new Official Plan, the City has provided policy that explicitly states that heritage conservation is not intended to discourage intensification or limit housing choice. Further, recent Heritage Conservation District Plans include language that acknowledges that HCDs are intended to change and that new development will and should occur. The Heritage Conservation District Plans' policies and guidelines are</p>	

	intended to guide change in these districts, not stop change.	
a. Prohibiting the use of bulk listing on municipal heritage registers;	<p>It is unclear what is meant by bulk listing, this term does not appear in the <i>Ontario Heritage Act</i> or Ontario Heritage Toolkit, what would the limit be on listing at one time? The amendments to the OHA that were proclaimed into force in July 2021 through Bill 108 have created a more rigorous system for listing non-designated properties on the Heritage Register including requirements for a statement explaining why the municipality believes the property to be of cultural heritage value or interest and the ability for property owners to object to listings.</p> <p>A robust heritage register, often developed through multiple listings, creates more certainty for property owners and limits the number of reactive designations undertaken in the municipality. It ensures that heritage planning staff are involved in the planning process at the earliest possible stage to identify any heritage issues before a planning application is submitted.</p>	<p>The City does not agree with this recommendation. Municipalities are still adjusting to recent changes to the <i>Ontario Heritage Act</i> which the City believes are sufficient to address the concern.</p>
b. Prohibiting reactive	The changes to the <i>Ontario</i>	The City does not agree with

<p>heritage designations after a <i>Planning Act</i> development application has been filed.</p>	<p><i>Heritage Act</i> in 2021 have already addressed this issue by linking processes under the <i>Ontario Heritage Act</i> with the <i>Planning Act</i> through “prescribed events.” The City suggests allowing additional time to determine if this process is effective in achieving the goal set out in this recommendation.</p> <p>Timelines under the <i>Ontario Heritage Act</i> have always been strict and subject to a deemed approval if a decision is not made in the required time period. The newly imposed timelines through recent changes to the <i>Act</i> reduce the potential delays a developer might face due to reactive designation. In addition, the City of Ottawa has a robust heritage register of property that may have cultural heritage value, this register ensures property owners are aware of the potential cultural heritage value of their property at the pre-consultation stage.</p>	<p>this recommendation. Municipalities are still adjusting to recent changes to the <i>Ontario Heritage Act</i> which the City believes are sufficient to address the concern.</p>
<p>17. Requiring municipalities to compensate property owners for loss of property values as a result of heritage designations, based on the principle of the best economic use of</p>	<p>This recommendation assumes that heritage designation results in a loss of property value and the Task Force report does not provide any evidence for this assertion.</p> <p>Section 1.7.1. e of the PPS</p>	<p>The City does not agree with this recommendation as it reduces the benefits of heritage designation to the potential economic value of the property and will significantly impact heritage</p>

land.

states that “Long term economic prosperity should be supported by encouraging a sense of place, by promoting well-designed built form and cultural planning and by conserving features that help define character, including built heritage resources and cultural heritage landscapes. conservation, a matter of provincial interest in Ontario.

This recommendation does not recognize the benefits of heritage conservation that cannot be quantified by land value as outlined in the PPS.

In general, research in Ontario and around the world illustrates that heritage designation does not result in a decrease in property values. Further, studies such as Hientzelman and Altieri (2013) that do suggest a reduction in property values related to heritage designation, are based in the United States and presuppose that no alterations or intensification are possible on designated properties, conditions not reflective of the planning context in Ontario where heritage properties are frequent sites of development. Others, such as Gould-Ellen and McCabe (2017) group the costs associated with heritage conservation regulation

alongside other, more common restrictions such as zoning by-laws, arguing for integrated processes which allow for the balancing of conservation costs and benefits within broader planning frameworks. This recommendation would reduce the ability of municipalities to make integrated decisions on heritage related development, prioritizing the interests of private property owners over the social, cultural and economic benefits that heritage conservation provides. A list of relevant sources is provided below.

There are myriad examples in Ottawa and Ontario of successful redevelopments that dramatically increase the density and property value on a site while conserving valuable heritage resources. For example, the City of Ottawa has a Community Improvement Plan related to heritage conservation that provides data illustrating that the conservation of heritage resources and development are mutually beneficial. A recently approved example includes the retention of two heritage buildings and the construction of a new seven storey residential building resulting in 67 new

residential units and an increase in property value before and after development of \$19,778,000.

Finally, it is unclear how compensation will be determined. Who will determine the “best economic use of land”? Will it be determined by direction in the Official Plan? How will disputes be resolved?

References

Been, V., Gould Ellen, I., Gedal. M., Glaeser, E., McCabe, B., “Preserving history or restricting development? The heterogeneous effects of historic districts on local housing markets in New York City” *Urban Economics*, Vol 92, March 2016

Ellen, I., & McCabe, B. (2017). Balancing the Costs and Benefits of Historic Preservation. In L. Fennell & B. Keys (Eds.), *Evidence and Innovation in Housing Law and Policy* (pp. 87-107). Cambridge: Cambridge University Press.
doi:10.1017/CBO9781316691335.005

Heintzelman, M. D., & Altieri, J. A. (2013). Historic preservation: Preserving value?. *The Journal*

	<p><i>of Real Estate Finance and Economics</i>, 46(3), 543-563.</p> <p>Rypkema, Donovan. <u>The Economics of Historic Preservation</u>. 2014</p> <p>Shiple, Robert. "Heritage Designation and Property Values: Is there an Effect?" <i>The International Journal of Heritage Studies</i>. Vol. 6 No. 1 2000</p> <p>Zahirovic-Herbert. V., Chatterjee. S., "Historic Preservation and Residential Property Values: Evidence from Quantile Regression" <i>Urban Studies</i>, Vol. 49 No. 2, 2012</p>	
<p>18. Restore the right of developers to appeal Official Plans and Municipal Comprehensive Reviews</p>	<p>While preparing the New Official Plan, the City engaged in over 2.5 years of consultation with residents and stakeholders, completing 157 engagement activities. A variety of tools and tactics including Discussion Papers, reports to Council, surveys, Open Houses, targeted stakeholder engagement, advertisements, and community outreach helped ensure that consultation was accessible and fulsome. The City is confident that its process gave everyone the opportunity to meaningfully engage. Reinstating the right to appeal is not necessary.</p>	<p>The City does not agree with this recommendation and it feels that the Minister already has appropriate powers to address reasonable concerns raised by landowners.</p>

Cut the red tape so we can build faster and reduce costs

<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 application approved if the legislated response time is exceeded.</p>	<p>The current timelines are out of sync with the regulations requiring circulation and seeking public comment. This proposal is impossible to implement without more realistic timelines and significant resource enhancements by municipal governments. If implemented, this recommendation will force municipalities to issue many more refusals rather than take the time to resolve issues.</p>	<p>The City does not agree with this recommendation.</p>
<p>20. 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>The City supports this recommendation.</p>
<p>21. 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 regulated profession such as professional engineer has stamped an</p>	<p>The pre-application recommendations generally reflect the City’s existing practices. Clarification of liability would be helpful and in the City’s interest.</p>	<p>The City could support the proposal related to pre-consultation provided there are reasonable exceptions to deal with new, unforeseen issues. The City supports clarification of liability.</p>

<p>application, the municipality has no liability and no additional stamp is needed.</p>		
<p>22. Simplify planning legislation and policy documents</p>		<p>The City has no concerns with this recommendation.</p>
<p>23. Create a common, province-wide definition of plans 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>		<p>In principle, the City supports exploring this approach.</p>
<p>24. Allow wood construction of up to 12 storeys.</p>		<p>The City supports exploring this through a Building Code review, provided the changes also address fire protection and life safety requirements.</p>
<p>25. Require municipalities to provide the option of pay on demand surety bonds and letters of credit.</p>	<p>The City is already in discussions with Greater Ottawa Home Builder's Association about a pilot project to try pay-on-demand surety bonds on a small number of development applications involving developers the City has a good track record with, and on projects that are not complex. Staff will provide a memo to Planning Committee on this pilot project once negotiations have</p>	<p>The City does not oppose this recommendation, <u>assuming that the option is equally available to affordable housing providers</u>, but the City would need some protection to ensure bondholders act reasonably to provide municipal access to funds if there are issues.</p>

	progressed further.	
<i>Prevent abuse of the appeal process</i>		
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.	This recommendation appears similar to Bill 139’s, <i>Building Better Communities and Conserving Watersheds Act, 2017</i> , introduction of appeal “validation,” which was short-lived. Related procedural rules or other support would benefit this recommendation.	The City has no concerns provided the province restores an office to advise community organizations or other stakeholders on the mechanics of filing a proper appeal. Resources would also need to be provided to the Ontario Land Tribunal so that an expeditious review of the material providing on the “leave” application could be done and not cause delay.
27. Prevent abuse of process:		The City has no concerns with this recommendation provided the province include guidance on implementation, such as what is considered “affordable” and tracking the affordable units for the affordability period.
a. Remove right of appeal for projects with at least 30% affordable housing in which units are guaranteed affordable for at least 40 years;		
b. Require a \$10,000 filing fee for third-party appeals;		The City is concerned that this amount is overly prohibitive for smaller stakeholder groups.
c. Provide discretion to adjudicators to award full costs to the successful party in any appeal brought by a third party or a municipality where its Council has overridden a	The Tribunal already has powers to award costs for abuse of process, and the existing rules need not be changed	The City does not agree with this recommendation.

<p>recommended staff approval.</p>		
<p>28. 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>The Tribunal already has the power to issue oral decisions; a procedure that binds those decisions the day they are issued is welcome.</p>	<p>The City supports this recommendation.</p>
<p>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>	<p>The Tribunal already has the power to award costs. Punitive level damages are unreasonable.</p>	<p>The City feels this recommendation is unnecessary and opposes it, <u>just as it opposes the timelines associated with deemed approvals in Recommendation 19, above.</u></p>
<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>		<p>The City supports this recommendation.</p>
<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</p>	<p>The City understands the importance of development application and infrastructure-related appeals being resolved in a timely matter but notes that general appeals of regulations or policy can also create efficiencies and add clarity in the long-term.</p>	<p>The City has no concerns with this recommendation provided there are checks and balances in the system to ensure that this does not result in a diminished case capacity for Eastern Ontario and small municipalities. In its submission on Bill 108, the</p>

<p>that will unlock significant housing capacity.</p>		<p>City previously recommended striking a separate panel for regions outside of the GTA.</p>
<p><i>Reduce the costs to build, buy and rent</i></p>		
<p>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>	<p>City Council has consistently indicated its ongoing support of the principle that "growth should pay for growth" and this should continue to be the underlying objective. The quantum of a development charge is based on the capital cost of growth-related infrastructure and regulated service standards. If this source of revenue is not available, the cost of growth would have to be offset by property taxes and user rates. Housing affordability involves many factors, staff agree with the principle outlined by AMO in their response to the Ontario Housing Crisis that <i>"The Province must work with municipalities to dispel myths about development charges, property taxes, and user fees by promoting how they are critical to creating livable homes and communities. Growth must pay for growth."</i> Ultimately, unless there is a reduction in growth-related project costs, there will continue to be a requirement in the future to increase</p>	<p>The City does not agree with the recommendation to waive development charges in order to provide financial incentives to increase the supply of housing units.</p> <p>Intensification can result in the need for new infrastructure or the expansion of existing services, therefore, infill development should continue to be eligible to be funded from development charges. Current legislation does not allow incentives to be funded from other types of growth. There is also no guarantee that waiving the payment of development charges on all infill residential projects up to 10 units will be reflected in lower housing prices.</p>

development charge rates.

While development charges are often identified as a major input to increased housing costs, they are in fact a cost recovery mechanism that directly provides for the required servicing to accommodate greenfield development, intensification, and redevelopment. In addition, many factors influence the cost of housing such as: land costs, construction costs, housing demand, interest rates, mortgage financing, financial speculation, income levels, access to job opportunities, consumer confidence, government regulations and broader economic conditions, which are all determinants of housing prices. The City has used existing policies allowed under the current legislation to create area-specific rates in locations where the growth-related infrastructure requirements are significantly different than other areas. In the future, by utilizing area-specific charges, staff believe the City will be able to continue to provide a differentiation by geographic area based on where development can be

	<p>anticipated to occur.</p> <p>The overall growth-related capital program identified in <u>the development charges background study</u> is already limited by mandatory deductions, service level restrictions and ineligible service categories that are imposed by the <i>Development Charges Act</i>. If development charges are waived as per this recommendation, it means these growth-related capital costs will be passed on to existing and future homeowners and businesses through higher property taxes and user fees to offset the revenue shortfall.</p>	
<p>33. Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.</p>	<p>The City already has a policy framework for directly supporting affordable housing initiatives using non-statutory development charge exemptions to provide direct financial support to specific community groups and by collecting development charges to fund local initiatives. In the future, the City will also utilize the full historical level of service cap for Affordable Housing to maximize the growth-related cost recovery for this component of the overall charge.</p>	<p>The City is supportive of this recommendation, however, it is dependent on meeting the definition of affordable as determined by the City Treasurer (with guidance from staff) <u>but not low end-of market units such as those that may come through inclusionary zoning.</u></p>

<p>34. Prohibit interest rates on development charges higher than a municipality's borrowing rate.</p>	<p>Municipalities should have the option to align their development charge policies with the actual inflationary cost associated with constructing growth-related capital projects. If growth is to pay for growth, then the corresponding capital costs need to be recovered. If the interest rate methodology is mandated by the Province, then this may result in the downloading of funding of growth-related infrastructure to the municipal sector. The City would have to then use alternative sources of financing or reduce overall service levels to fund the difference in interest rates. Municipalities should be allowed to continue to apply the actual annual inflationary impact on growth-related construction costs to respond to current market conditions.</p>	<p>The City does not support the imposition of an interest rate methodology by the Province <u>that inhibits cost recovery.</u></p>
<p>35. 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</p>		<p>The City has no concerns with this recommendation.</p>

<p>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 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>36. 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% provincial rebate and remove any clawback.</p>	<p>This is not a municipal matter.</p>	<p>The City has no comment.</p>
<p><i>Make it easier to build rental</i></p>		
<p>37. Align property taxes for purpose-built rental with those of condos and low-</p>		<p>The City supports this recommendation.</p>

rise homes.		
<i>Making homeownership possible for hardworking Ontarians who want it</i>		
38. Amend the <i>Planning Act</i> and <i>Perpetuities Act</i> to extend the maximum period for land leases and restrictive covenants on land to 40 or more years.		The City supports this recommendation.
39. Eliminate or reduce tax disincentives to housing growth.	This is not a municipal issue.	The City has no comment.
40. Call on the Federal Government to implement an Urban, Rural and Northern Indigenous Housing Strategy.		The City supports this recommendation.
41. Funding for pilot projects that create innovative pathways to homeownership for Black, Indigenous and marginalized people and first-generation homeowners.		The City supports this recommendation.
42. Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects.	As the recommendation specifies provincial and federal loan guarantees, implementation would not impact City finances.	The City supports this recommendation.
<i>Support and incentivize scaling up housing supply</i>		
43. Enable municipalities,	This is not a problem in the City	The City has no concerns.

<p>subject to adverse external economic events, to withdraw infrastructure allocations from any permitted projects where construction has not been initiated within three years of building permits being issued.</p>	<p>of Ottawa.</p>	
<p>44. Work with municipalities to develop and implement a municipal services corporation utility model for water and wastewater under which the municipal corporation would borrow and amortize costs among customers instead of using development charges.</p>	<p>This recommendation goes beyond the scope of affordable housing and requires all municipal governments to create a separate corporate utility model for water/wastewater. Such a model would have wide-ranging impacts on local budgets, require council approval and a detailed analysis and business plan.</p>	<p>The City does not agree with this recommendation.</p>
<p><i>Create the Labour Force to meet the housing supply need</i></p>		
<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>	<p>These recommendations are not directly related to the City, but the City acknowledges the risk of the supply of skilled trade to housing projects and municipal infrastructure projects.</p>	<p>The City supports these recommendations.</p>
<p>46. Undertake multi-stakeholder education program to promote skilled trades.</p>		
<p>47. Recommend that the</p>		

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.

Create a large Ontario Housing Delivery Fund to align efforts and incent new housing supply

48. The Ontario government should establish a large "Ontario Housing Delivery Fund" and encourage the federal government to match funding. This fund should reward:

a) annual housing growth that meets or exceeds provincial targets,

49. b) reductions in total approval times for new housing, c) the speedy removal of exclusionary zoning practices.

49. Reductions in funding to municipalities that fail to meet provincial housing growth and approval

If the Province is prepared to invest in a new funding model for municipalities, the City feels that funding could be directed to better purposes such as a program whereby the province matches (at a minimum) annual municipal investments in affordable housing (e.g. as per its Long-Range Financial Plan, the City is investing \$17 million in 2022 and is expecting up to \$5.6 million from the Province for affordable housing).

City is not opposed to this item but is opposed to tying these outcomes to a proposed funding model.

The City does not agree with this recommendation as currently proposed. The City recommends that the Provincial government match (at a minimum) annual municipal investments in affordable housing as per a Long-Range Financial Plan as an alternative.

<p>timeline targets.</p>		
<p><i>Sustain, focus measure, monitor, improve</i></p>		
<p>50. Fund the adoption of consistent municipal e-permitting systems and encourage the federal government to match funding. Fund the development of common data architecture standards across municipalities and provincial agencies and require municipalities to provide their zoning by-laws with open data standards. Set an implementation goal of 2025 and make funding conditional on established targets.</p>	<p>The City's Zoning By-law is currently undergoing a modernization process to enable the by-law to be interpreted more readily through digital platforms and geomatics and is freely available online in both official languages; however, technology that creates efficiencies across the province, standardizes commonly used terms and definitions and helps housing providers better understand and navigate municipal regulations is welcome.</p> <p>A new Provincial interface should account for the fact that zoning by-laws are amended regularly, are arranged differently in each municipality and may not always be available in both official languages. Likewise, a universal e-permitting/commenting system could create efficiencies and predictability for developers.</p>	<p>The City supports this recommendation.</p>
<p>51. Require municipalities and the provincial government to use the Ministry of Finance population projections as the basis for</p>	<p>If the Province re-opens appeals to Comprehensive Reviews of Official Plans, this standardization requirement will reduce the City's risk of appeals</p>	<p>The City supports this recommendation.</p>

<p>housing need analysis and related land use requirements.</p>	<p>over population projections. Standardized methodologies across Ontario would benefit municipalities.</p>	
<p>52. Resume reporting on housing data and require consistent municipal reporting, enforcing compliance as a requirement for accessing programs under the Ontario Housing Delivery Fund.</p>	<p>City has no issues with implementation of consistent reporting and enforcing compliance as a requirement for accessing provincial funding. The New Official Plan already contains annual reporting requirements for intensification, and a future Inclusionary Zoning scheme will require regular reporting on the local rental and ownership housing markets.</p>	<p>The City is not supportive of recommendation #48, to establish an Ontario Housing Delivery Fund as currently proposed, but is supportive of implementing consistent reporting and enforcing compliance as a requirement to access provincial funding.</p>
<p>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>	<p>Measuring supply is reasonable. Measuring demand is very difficult and the City would need more provincial direction on methodology. This would require more resources in monitoring.</p>	<p>In principle, the City has no objections to this recommendation provided the province provides further direction on measuring demand.</p>
<p>54. Empower the Deputy Minister of Municipal Affairs and Housing to lead an all-of-government committee, including key provincial ministries and agencies, that meets weekly to ensure our remaining recommendations and other productive ideas are</p>		<p>The City supports this recommendation.</p>

implemented.		
55. Commit to evaluate these recommendations for the next three years with public reporting on progress.		The City supports this recommendation.