

RESPONSE TO PROVINCIAL HOUSING AFFORDABILITY TASK FORCE RECOMMENDATIONS

#	Task Force Recommendations	Agree/ Disagree	Staff Comments
1.	Set a goal of building 1.5 million new homes in ten years.	Agree in Principle	This is a Province wide goal and York Region is committed to delivering growth planned through the Region's MCR. Any new housing target should include affordable housing targets.
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.	Agree in Principle	Support a wide range of housing types planned through Region's MCR, which balances intensification with other critical objectives such as infrastructure capacity, employment opportunities and complete community objectives.
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>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, allow single egress, etc.).</p>	<p>a) Agree in Principle</p> <p>b) Agree in Principle</p>	<p>a) Support general diversification of the housing stock, including in existing residential areas, where it makes sense in a local context. In some areas, the existing stock (50s/60s bungalows as example) are inherently more affordable than the redeveloped product will be. Opportunity to protect existing affordable housing stock is needed. Consideration of hard and soft infrastructure capacity and public input is required.</p> <p>b) Safety concerns around limiting access must be addressed.</p>
4.	Permit "as of right" conversion of underutilized or redundant	Agree in Principle	There are opportunities to explore this where it adds opportunity and vibrancy to

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	commercial properties to residential or mixed residential and commercial use.		communities, but equally a need to maintain key employment areas and existing commercial GFA for mixed use amenities in the community. Need mechanism to address supporting infrastructure needs, public input, etc.
5.	Permit “as of right” secondary suites, garden suites, and laneway houses province-wide.	Agree	Already permitted however, zoning bylaws should be updated accordingly.
6.	Permit “as of right” multi-tenant housing (renting rooms within a dwelling) province-wide.	Agree	Tenant protection and property standards need to be upheld. Criteria should be established by each municipality through their zoning by-law and licensing regulations.
7.	Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children.	Agree	Subject to context sensitive density and available servicing. Understanding of school capacity and capacity cycles would assist to achieve sustainable capacity at schools.
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.	Disagree	Density to support transit is desirable but it still must be context sensitive and planned to ensure infrastructure capacity.
9.	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).	Agree in Principle	Limit to priority transit corridors with frequent service. Conditional on context sensitive design, servicing capacity and limiting further height and density increases. A preferable alternative to this recommendation would be to allow as of right zoning for purpose-built rental and/or affordable rental housing" of six to 11 storeys on transit priority corridors as determined by municipalities. This will recognize and incentivize the type/tenure of housing supply most needed.
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.	Agree in Principle	Toronto specific.
11.	Support responsible housing growth on undeveloped land, including outside existing municipal boundaries, by	Disagree	Do not agree with urban expansion outside of an MCR, which would be counter to Growth Plan objectives.

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	building necessary infrastructure to support higher density housing and complete communities and applying the recommendations of this report to all undeveloped land.		Not all undeveloped lands are appropriate for housing (e.g. employment lands, natural areas, parkland, agricultural lands).
12.	<p>Create a more permissive land use, planning, and approvals system:</p> <p>a) Repeal or override municipal policies, zoning, or plans that prioritize the preservation of physical character of neighborhood</p> <p>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> <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> <p>d) Remove any floorplate restrictions to allow larger, more efficient high-density towers.</p>	<p>a) Disagree</p> <p>b) Agree in Principle</p> <p>c) Disagree</p> <p>d) Disagree</p>	<p>a) The value of certain neighbourhoods is defined by their physical character. Well written policies that allow for sensitive new building designs that are sympathetic to community character is a better approach</p> <p>b) Agree in principle subject to municipal standards being met</p> <p>c) Need contextually appropriate urban design – good urban design is worthwhile, takes work and results in better outcomes.</p> <p>d) We’ve moved away from 60’s style slab buildings which we have learned are stark, visually imposing, cast large shadows, create wind impacts.</p>
13.	Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.	Disagree	Public participation is an inherent part of the Planning process.

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14.	Require that public consultations provide digital participation options.	Agree	Digital participation during COVID has shown a public interest in engaging in this way.
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.	Agree in Principle	This could also be extended to technical consents, lifting of Holding provisions and exemptions from part lot control, as well as approvals under the Condominium Act. More information regarding pre-approved third-party consultants required.
16.	Prevent abuse of the heritage preservation and designation process by: 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	Agree in Principle	Some specific protections may be required, as determined by the local municipality.
17.	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.	Disagree	Speculative development is not a right. Heritage designations have community value. The loss of a heritage resource constitutes a loss to the community.
18.	Restore the right of developers to appeal Official Plans and Municipal Comprehensive Reviews.	Disagree	This would be a major step backward in providing timely completion of MCR's and would add years and extraordinary costs (in the millions) to the final approval process. OLT should be further limited not expanded.
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.	Disagree	Deemed approval creates a risk of substandard or flawed applications being granted approval status. Support legislative timelines for provincial review process.
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.	Agree	
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;	Agree in principle	Maximizing clarity of expectations and promoting efficiency through pre-consultation is supported but some flexibility will likely still be required.

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	confirms the number of consultations established in the previous recommendations; and clarifies that if a member of a regulated profession such as a professional engineer has stamped an application, the municipality has no liability, and no additional stamp is needed.		With respect to engineering approvals and sign-off, it is important to ensure that municipal liability is protected.
22.	Simplify planning legislation and policy documents.	Agree	
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.	Agree in Principle	Standardization could help with clarity and speed up the process. However, local context is important and rather than a prescriptive template, a pick list with standard wording for common conditions is recommended.
24.	Allow wood construction of up to 12 storeys.	Agree in principle	Defer to fire/building experts.
25.	Require municipalities to provide the option of pay on demand surety bonds and letters of credit.	Agree in principle	<p>Clarification is required that this only applies to securing performance for site plan and subdivision agreements and does not apply to development charge deferrals.</p> <p>Confirm is required that the goal of this approach is to ensure that work is done properly and that if it is not, municipalities can complete the work at the full cost of the developer.</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.	Agree in principle	This may cause some initial delay (depends on how quickly leave applications are dealt with) but in the long run it will allow the OLT to dispense with frivolous or vexatious appeals before they get to the OLT and free up capacity to deal with legitimate appeals in a timely manner. The key to avoiding delay would be ensuring that that leave to appeal process is done in a timely manner, for example may be by way of a written motion/request.
27.	Prevent abuse of process: 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.	<p>a) Disagree</p> <p>b) Disagree</p>	<p>a) Planning merits for any project are important</p> <p>b) The magnitude of the proposed fee would seem to preclude input of the</p>

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	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.	c) Disagree	public and potentially smaller organized groups (NGOs etc.). c) Can award costs now and dismiss frivolous and vexatious appeals without a hearing – stronger implementation of existing rules would help prevent abuse of process.
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.	Agree	
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.	Disagree	Lack of approval generally is a result of a poor application. Municipalities need to retain their power to make decisions.
30.	Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets.	Agree	
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 unlock significant housing capacity.	Agree	Prioritization should include both projects and policies that include affordable housing. Priorities should be given to municipal initiated amendments that are appealed in addition to development applications.
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.	Disagree	Contrary to growth pays for growth. This could reduce development charge collections and impact time-limited nature of redevelopment credits. Waiving DCs could result in those costs being put on the tax levy of user rates, making it more difficult to fund projects, and reduce the Region's ability to build infrastructure needed for growth. Changes to the DC Act may be needed to recover waived costs from other development.

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33.	Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.	Agree in Principle	Supported for community housing. Not appropriate for market affordability, as that would be contrary to growth paying for growth and introduce similar concerns as noted for 32 above.
34.	Prohibit interest rates on development charges higher than a municipality's borrowing rate.	Disagree	It is unclear if this recommendation relates to interest rate on frozen DCs. The Region's borrowing rate changes depending on timing and term of the debt. Could limit Region's ability to mitigate impacts of freezing through interest policy. Could limit ability to charge a fixed interest rate on development charges which provided the certainty which was the goal of the DC freezing legislation.
35.	Regarding cash in lieu of parkland, s.37, Community Benefit Charges, and development charges: 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. 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.	a) Agree in Principle b) Agree in Principle	a) Consistent with the Fiscal Strategy, the Region manages and optimizes development charge reserves. Municipalities already report on development charge reserve levels, collections and drawdowns annually. b) Unclear if this implies a requirement that municipalities use area-specific development charges/property taxes for infrastructure that does not have a municipal-wide benefit.
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	Agree	

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	government match the provincial 75% rebate and remove any claw back.		
37.	Align property taxes for purpose-built rental with those of condos and low-rise homes.	Agree	Region harmonized tax ratio for all residential property types in 2001.
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.	Agree	
39.	Eliminate or reduce tax disincentives to housing growth.	Agree in principle	Not sure what taxes are being referenced here but should be scoped to apply to affordable housing.
40.	Call on the Federal Government to implement an Urban, Rural and Northern Indigenous Housing Strategy.	Agree	
41.	Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.	Agree	
42.	Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects.	Agree	
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.	Agree in principle	Clarification as to what “external economic events” are required.
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.	Disagree	Growth should pay for growth. Preliminary assessments indicate that in York Region it may mean close to a doubling of the water bill rate. Could impact the Region’s ability to emplace necessary infrastructure to enable growth and could also have the unintended consequence of creating more opposition to growth.
45.	Improve funding for colleges, trade schools, and apprenticeships; encourage and incentivize municipalities, unions and employers to	Agree	

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	provide more on-the-job training.		
46.	Undertake multi-stakeholder education program to promote skilled trades.	Agree	
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.	Agree	
48.	<p>The Ontario government should establish a large "Ontario Housing Delivery Fund" and encourage the federal government to match funding. This fund should reward:</p> <p>a) Annual housing growth that meets or exceeds provincial targets</p> <p>b) Reductions in total approval times for new housing</p> <p>c) The speedy removal of exclusionary zoning practices</p>	<p>a) Disagree</p> <p>b) Disagree</p> <p>c) Agree</p>	<p>a) Provincial target are not set annually, so it is unclear how this would be measured. For example, there could be a situation where a municipality "underperforms" in one calendar year and over performs the following year, based on where site plans and plans of subdivision are approved.</p> <p>b) Unless approval timelines are broken down between municipalities and applicants' role in the delay. Municipalities can only control their own actions and should be rewarded for expeditious processing. Comments that take applicants months to resolve should also be tracked so that the sources of delay are fully understood.</p> <p>c) Rewarding municipalities for updating zoning by-laws that conform to up-to-date official plans is a good idea.</p>
49.	Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.	Disagree	There are several factors that contribute to whether growth and approval timeline targets are met or not. Not all are in the control of the municipality.
50.	Fund the adoption of consistent municipal e-permitting systems	Agree in Principle	Transformational shifts to IT and data management may not be feasible by 2025

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	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 bylaws with open data standards. Set an implementation goal of 2025 and make funding conditional on established targets.		and/or would require substantial administrative effort. Efforts to standardize terminology and data will assist implementing technology solutions and data sharing.
51.	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.	Disagree	This would halt the Region's MCR requiring a restart of the Land Needs Assessment, with cascading implications on completed Master Plans and Development Charges Bylaw.
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.	Agree	Unless housing constraints are a result of delayed Provincial approval of required infrastructure.
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.	Disagree	Meeting housing supply requirements is sufficient. Quantifying demand is subjective and complex (LNA) and should only be undertake in conjunction with the other aspects of a comprehensive review. Agree with the principle of open data and making appropriate information available to the public.
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 any other productive ideas are implemented.	Agree	Agree with approaches that work to breakdown siloed Ministries.
55.	Commit to evaluate these recommendations for the next three years with public reporting on progress.	Agree	