

January 25, 2019

Director, Market Housing Branch  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 14<sup>th</sup> Floor  
Toronto, Ontario M5G 2E5

### **OPPI Response to the Housing Supply Action Plan (ERO Number 013-4190)**

On behalf of the Ontario Professional Planners Institute (OPPI), I am pleased to submit our response to the government's consultation on the development of the Housing Supply Action Plan.

OPPI is the recognized voice of Ontario's planning profession and our over 4,500 Registered Professional Planners (RPPs). RPPs are the skilled, professional and dependable navigators that are employed to help lead communities towards the Ontario of tomorrow. RPPs are the local experts that bring together differing points of view, consult and develop recommendations that provide informed choices for decision-makers and elected officials. RPPs act in the public interest as professionals who work to improve the quality and livability of communities in Ontario today and their sustainability long-term.

We are uniquely positioned to provide feedback on this action plan as our members are the experts on the ground with respect to *Planning Act* approvals and policy implementation. Our RPPs have an important role in implementing policy changes. They are positioned to lead and work with others on proactive change and policy development and lend their support at any time given their depth of resources and expertise.

In general, OPPI members support the government's intended objective to increase the supply of housing in Ontario by addressing barriers that get in the way of new ownership and rental housing. Increasing housing supply and options for everyone would:

- Support our economy by attracting young talent and retaining employees.
- Support quality of life measures by offering more options for seniors, recent graduates, new Canadians or recently retired colleagues the choice of where to live.
- Support first-time homebuyers, particularly citizens entering the workforce or starting a family.
- Allow new Canadians and young adults the flexibility to find housing close to work.
- Reduce commute times, traffic, congestion and automobile emissions.

We want to begin by providing some general commentary on the elements of an effective land use planning system that serves as the foundation to getting housing built in the Province. As professional planners, we believe that effective land use planning requires the right mix of policy and process. Policy should incorporate the principles of good planning and provide the guidance needed to achieve growth, including: natural features, water, agriculture, mineral, cultural features, employment opportunities and jobs, and much more.

It should promote the efficient use of infrastructure and the protection of health and safety. Policies should be up-to-date and clear enough to let the community know what is and is not permissible. Process should provide appropriate public engagement and transparency in order to promote public confidence in decisions.

The Ministry of Municipal Affairs and Housing outlined five key themes in this consultation, and OPPI will provide its comments on these themes:

**Speed: It takes too long for development projects to get approved**

OPPI members agree the typical development approval timeline in the Province of Ontario is slow when benchmarked with other Canadian jurisdictions. There are opportunities to streamline the system in a manner that protects public interest and could speed up the approvals process.

Two specific areas of consideration for the government as it relates to site plan approvals and the land use planning appeals process include:

- Site Plan Approval: OPPI members who serve as municipal planners can play a role in streamlining the process for site plan approvals. Like the approval system for building permits and the Chief Building Officer role, the government could look to legislate a framework that delegates approvals to the Chief Planner or Planning Commissioner in a municipality. This simplified process for routine applications could remove months from the approval process.
- Appeals Process: It is too early to comment on the effectiveness of changes made in Bill 139 and the establishment of the Local Planning Appeals Tribunal process as it remains untested. However, resourcing challenges are becoming apparent and must be addressed to process appeals in a timely manner.

**Mix: There are too many restrictions on what can be built to get the right mix of housing where it is needed**

The overarching framework set out in the PPS is based on sound policies and principles. The primary challenge to achieving those provincial policy objectives when it comes to building the right mix of housing lies in implementation not policy.

The government could explore the following implementation considerations to drive the right mix of housing.

- **Zoning:** Municipal discretion over zoning implementation (i.e. pre-zoning or requiring re-zoning) should remain; however, the provincial government should encourage pre-zoning in key growth areas to incent housing development where it makes sense. The Ministry could also proceed with long-awaited regulations for conditional zoning.
- **Employment Land Conversion:** Certain employment protections, especially near mobility hubs, could be less prescriptive to provide for a mix of uses without a full Municipal Comprehensive Review and conversion process to enable housing development on top of certain employment uses.
- **Air Rights:** Facilitating the development of housing through air rights could be an avenue to unlock new housing supply, especially on top of, and around, major transit stations. The government could also explore a range of density transfers in legislation in this regard.
- **Secondary Suites:** Policies that promote the development of secondary suites should be explored. These could include incentives for greenfield developments to include secondary suites and the lessening of overall restrictions and obstacles for existing single-family homes to create these suites.

**Cost: Development costs are too high because of high land prices and government-imposed fees and charges**

There are number of costs that contribute to development decisions, some that are direct and others that are indirect. Municipalities rely on fees and charges to fund necessary infrastructure to service growth resulting from these new developments.

However, there could be opportunities to review frameworks around policies that add costs to developers without a direct financial benefit to the municipality, as well as changes to the distribution of certain fees to incent growth where it makes sense without jeopardizing the integrity of municipal revenue sources.

- **Parkland Requirements:** The provision of parkland has always been fundamental to the planning of Ontario's communities. As communities intensify, a change in the way people use parks is occurring. The adequate provision of parkland will remain important for communities to respond to its changing needs, but some reconsideration in growth areas may be needed with respect to how parkland requirements are contemplated.
- **Section 37:** The government could explore more consistency in how Section 37 is leveraged. It is sometimes used inconsistently and results in frustration on the proponent

side. The government could look at requiring funds directed to Community Improvement Plans in the areas to provide some predictability to developers and communities.

- Development Charges: Moving towards a variable development charges framework could be a way to reduce cost of development in certain areas to incent density and add new housing to the market.

### **Rent: It is too hard to be a landlord in Ontario, and tenants need to be protected**

Ontario's rental housing stock serves as an important part of the housing mix. OPPI members appreciate the need for a healthy and balanced market that serves the interests of both tenants and rental housing providers, but we are not in a position to comment on specific landlord-tenant issues or policies as put forth in the *Residential Tenancies Act* as its corresponding regulations.

### **Innovation: Other concerns, opportunities and innovations to increase housing supply**

OPPI supports innovative opportunities to increase the housing supply in Ontario and ensure a healthy mix of options for everyone. A favourable approach the government could explore is to encourage land lease housing. It would be beneficial to retirees and seniors who wish to downsize and live in a smaller dwelling. Land lease housing permits tenants to use a piece of land owned by a landlord in exchange for rent. In this case, rental fees for land and common services are affordable and can be attractive. While this approach can work in the Greater Toronto and Hamilton Area, it could be part of a corresponding affordable housing strategy for small and medium-sized communities trying to attract jobs and new residents.

OPPI is happy to work with the government and consult further on its development of the Housing Supply Action Plan. We would welcome the opportunity to meet with Ministry staff to discuss our submission and answer any questions you may have. Please feel free to contact me at 416-483-1873 or by email at [executivedirector@ontarioplanners.ca](mailto:executivedirector@ontarioplanners.ca).

Sincerely,



Mary Ann Rangam  
Executive Director, Ontario Professional Planners Institute