

April 28, 2022

To Whom It May Concern,

The Trafalgar Chartwell Residents’ Association (TCRA) represents residents from a small corner of South East Oakville, comprised of approximately 1500 family dwellings, including condominiums, town houses, apartments and single family homes. We welcome the opportunity to participate in providing input into the proposal regarding “increasing missing middle housing and gentle density, including supports for multigenerational housing.” We would like to congratulate the Ministry on its commitment to a long-term strategy to tackle this problem, and the recognition that the strategy will require on-going commitment and coordination from all levels of government.

The current housing crisis has developed over the past 15 years or thereabouts, where demand for homes has far exceeded supply. It is a long-term problem that cannot be fixed with a short-term solution. We are encouraged that you are exploring ways to increase missing-middle housing and gentle density, including supports for multi-generational housing. In terms of supply, however, it was revealed at the Ontario Big City Mayors caucus in January 2022, that developers have an inventory of approximately 250,000 approved unbuilt housing units, mainly located in the GTHA, that are yet to see a single sod turned over. Why is this? Are they restricting supply to drive up prices and thus profits? Incentivising the developers to begin the immediate construction of these dwellings would release the pressure valve on the current scarcity problem.

One of the strengths of the current system is that the Municipalities develop their Official Plans under the direction and guidance from the Province, who approve the Official Plans. This covers population growth targets, environmental concerns, urban boundary expansion etc. The Municipalities are then responsible for the implementation and execution of the Official Plans and accountable for the success (or otherwise) of them. **Local control is imperative** – a one size fits all approach – “as of right” development – simply will not work in the rich and diverse fabric of the municipalities across Ontario.

Consequences for “as of right” development of the so-called “missing middle” in the form of garden suites, laneway housing, low- and mid-rise apartments and variations thereof, could be many, far reaching and unintended. We do not support this. It will totally disrupt decades of careful strategic planning for Ontario’s land use. “As of right” development subverts democracy by denying current residents, who are also tax-payers and voters, the right to have their objections to a specific development heard. If developers are unhappy with the length of time it takes to get planning permission currently, due to delays caused by objections etc, perhaps they should consider sticking to what has been approved by the Town, Region and Province in the Official Plans.

Organic “as of right” growth, rather than planned growth, is what happens in developing countries. Interruptions to municipal infrastructure and services are severe, leading to the failure of fresh water and sewer systems, overburdened hydro systems, insufficient parking, inability to collect garbage, inadequate public transportation, long lags prior to increasing school capacity and chaos results. **Local control over planning and development**, in whatever form it takes, **is essential** if we want to maintain our first world standard of living to attract and retain current residents in Ontario.

With regards to the four questions contained in your consultation proposal, we are not experts in this field, so hesitate to provide direct answers. In addition, the questions as structured are all biased towards getting the response you seek (as outlined in the Housing Affordability Taskforce report) and fail to address the only point that is relevant: **Housing affordability**

By definition, “affordable housing” is housing with a market price for purchase or rent where households spend no more than 30% of their gross household income on housing, without government assistance. For example, in 2019 in Halton, the affordable (non-assisted) threshold price for a home was $393,400 with a household income threshold of $107,100. With housing in short supply, fewer and fewer affordable homes are available for families, as prices and rents are sky rocketing at a much faster rate than incomes are increasing. Augmenting housing supply quickly, by streamlining approval processes will, theoretically, speed up the building of homes in whichever form. However this won’t necessarily mean that the cost savings to the developer from the faster approval process will be passed on to the buyer in the form of a lower purchase price. It will likely just mean larger profits for the developers. It will do nothing to make homes more affordable. Can developers even build homes to fit this price bracket?

TCRA is convinced that the answer lies in retaining **local control** and **local planning** as key elements in the long-term strategy going forward. We are convinced that a strategy which combines federal policy, provincial policy and local execution *will* yield affordable housing in the long-term without compromising our first-world society.

Yours sincerely,

Carolyn McMinn

President

Trafalgar Chartwell Residents’ Association