

ANALYSIS OF

Ontario's Efforts to Boost Housing Supply



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Analysis of Ontario's Efforts to Boost Housing Supply

Executive Summary

The Ontario Government has set an ambitious goal: adding 1.5 million homes to the province's housing stock by 2031.

This goal reflects the urgent need to solve Ontario's housing affordability crisis.

Many hard-working, middle-class Ontarians believe they will never be able to afford a home. The crisis is ultimately driven by too few homes for too many people. A shortage of builders, tradespeople, and land is compounded by red tape and a widespread bias against development. Government changes to down payments, mortgage qualifications and carrying costs have not helped. Coupled with rising interest rates and higher borrowing costs, these changes are additional barriers to affordable home ownership.

As a result, supply of both owned and rental properties has not kept up with demand. Since 2018, the provincial government has made commendable efforts to address lack of supply. Notably, 2021 had the highest level of housing starts in over 30 years, with a milestone 100,000 units; and 2022 had the highest number of rental starts since 1991 with 14,917 units.

However, starts have slipped since then: the province saw 96,000 housing starts in 2022, and early estimates for 2023 come in at 90,000 units. While these are still impressive numbers compared to the previous three decades, they fall short of the 150,000 new units needed on average, per year to meet that 1.5 million-home goal.

Unless dramatic steps are taken, Ontario's economic and social future are at stake.

In pursuit of getting more homes built, the Ontario Government has made sweeping changes to the province's planning and development regime since 2018. It has also recognized that all levels of government must work together to solve the problem. But higher interest rates and construction financing costs



have slowed positive progress on new developments, and risk slowing the pace of growth that has come from efforts to date.

A major step—and driver of many recent changes—was to create the Housing Affordability Task Force, which provided 55 recommendations in its 2022 report. The government accepted this comprehensive report and its ambitious recommendations, both recognizing the significant housing challenges facing Ontario and adopting a road map forward to address the crisis.

This paper provides an analysis of Ontario’s efforts and examines progress on the Task Force recommendations. Out of the 55 recommendations, we found that:

- 18 are fully implemented (33%)
- Major progress has been made on 9 (16%)
- Some progress has been made on 15 (27%)
- 13 have not yet been acted on (24%)

Through four pro-housing pieces of legislation – three of which followed the Task Force report – the Province has made significant changes to help increase Ontario’s housing supply by cutting through red tape, modernizing zoning, improving decision timelines, and improving land-use planning.

While initial legislative reforms were commendable: aligning official plans with provincial priorities, encouraging growth, and ensuring short-term land is available for homes, momentum has recently slowed. Since September’s cabinet shuffle, the Provincial Government has stepped back to review previous decisions under a new Minister of Municipal Affairs and Housing.

The importance of consistent and transparent processes to long term success cannot be understated. We fully support the Provincial Government resuming, at full speed, their efforts to fulfill their housing ambition. They must continue to push forward and cannot hesitate to use the tools at their disposal to encourage growth, increase density, and get more homes built that people can afford.

Ontario has set a bold goal to address the housing affordability crisis, and now is the time for continued bold action. We cannot hope to improve affordability without addressing the need for increased housing supply, from purpose-built rentals to new homes.

Based on progress to date, this paper recommends next steps in three key areas, that decision-makers and officials must take to get more homes built and improve affordability. These action items are:

Fix the Ontario Land Tribunal and Zoning Rules

- 1) Reform the Ontario Land Tribunal by preventing abuse, eliminating backlog, and allowing fines for unreasonable delays
- 2) Implement land use changes to end exclusionary zoning
- 3) Modernize zoning to support commercial-to-residential conversions and greater density along transit corridors
- 4) Streamline new development applications by requiring pre-consultations

Lower Housing Costs

- 5) Allow water and wastewater services to be provided through a municipal services corporation
- 6) Abolish the Land Transfer Tax
- 7) Reform how municipalities collect and spend development charges

More Workers and New Models of Ownership

- 8) Increase the number of skilled tradespeople in Ontario
- 9) Fund pilot programs that create innovative pathways to homeownership for first-time homeowners
- 10) Implement provincial loan guarantees and support for innovative ownership projects

Together, these ten steps would provide more resources for projects and infrastructure that enable growth, make growth planning more consistent, and free up underused land for homes.

As the Government's own projections for the next few years fall short of the needed 150,000 per year to meet that ambitious target, more can and must be done to give people in Ontario the homes they need today, and in the future. The provincial government has many critical tools available to use, ensuring municipal governments build more homes faster to accommodate growth. With this paper, we hope to point the best way forward.

Government Action 2018–2023 to Address Housing Supply

Within their first year in office, the Ford government brought forward significant legislation to cut through red tape, reduce government regulations, and open more lands for development. Without these efforts, the housing supply crisis would be even worse than it is today. The following section provides a summary of the various legislative and policy tools that the province undertook from 2018 to the present.

Bill 108: More Homes, More Choice Act, 2019

Bill 108 was a foundational step to increasing housing supply across Ontario. It amended various aspects of the Planning Act, including most crucially allowing two residential units per house as-of-right, as well as allowing an additional residential unit ancillary to a house (subsection 16(3))¹. Notably, the bill also altered zoning policies and reduced decision timelines from 210 to 120 days (sections 17, 22, 34).²

The bill also worked to advance higher density development surrounding major transit station areas, or 'transit-oriented communities'.³ Given the significant investments being made in new transit in Ontario, creating new attainable housing around transit developments is an important step that will help address housing affordability, climate change (through encouraging more public transportation), and increase density in areas that have the necessary public infrastructure. However, as the onus was on municipalities to create new rules to complement these changes⁴, the impact of the act was not immediate. Further, as developments and investments in public transportation take years to come to fruition, this policy has not yet had an immediate effect on supply. It also only



addressed density and does not factor in single-family homes. Regardless, we believe it will help in the medium- and longer-term.

Another key change included in Bill 108 was the creation of Community Benefit Charges (CBCs), which replaced previous charges under section 37 of the Planning Act. Previously, section 37 charges were arbitrary amounts based on a councillor's request upon rezoning, but under the new act they can be a maximum of 4% of the value of the land.⁵ The benefits were multiple. First, a land value charge automatically collects more in high-value areas—such as close to transit—by design, so this new charge encourages developers to build smaller, cheaper, and less profitable units. Second, CBCs now take a lower share of construction costs in areas with less development, an important improvement. Third, developers did not know what section 37 costs they might have faced. The previous model was a roadblock to new construction and development as costs were unpredictable and often too high to justify the investment, preventing more homes from being built.⁶

Bill 108 also included notable changes to the Ontario Heritage Act, giving municipal councils a greater role in the decision-making process for heritage sites by empowering them to consider notices of objection. Furthermore, heritage by-laws became appealable to the Ontario Land Tribunal, which can now decide to repeal, amend, or direct council to appeal or amend by-laws.⁷

The process to dedicate parkland in new municipal developments was also updated, striking the right balance between urban parkland and the increased density needed to address the housing affordability crisis. Ontario has some of the most beautiful and plentiful greenspaces in North America; however, in the past, parkland dedication could – and has – been used to block or delay planned affordable housing developments.

Bill 109: More Homes for Everyone Act, 2022

A key legislative effort, Bill 109 amended the Planning Act, introduced the Community Infrastructure and Housing Accelerator (CIHA), established a review process for CBCs and made changes to the approval process.





Notably, Bill 109 introduced an application fee refund if a decision is not made within certain timelines, a critical step in incentivizing more homes being built.⁸ This rule took effect in January 2023.

CIHA allows the Minister of Municipal Affairs and Housing to make a zoning order at the request of the municipality.⁹ Additionally, CIHA allows the Minister to expedite developments for both community infrastructure and any type of housing. This includes community housing, affordable housing, and mixed-use developments¹⁰

Finally, Bill 109 provided a key framework for the implementation of CIHA by allowing for a centralization of authority within a ministerial tool.

These measures give the province tools to help settle disputes and get housing built, by allowing for difficult decisions to be made at the provincial level, so municipalities are not seen as taking a side between local concerns and development goals.

Bill 23: More Homes Built Faster Act, 2022

The More Homes Built Faster Act, or Bill 23, addressed housing issues through land use planning changes.

Before Bill 23, municipal governments used site plan approvals (municipal planning rules that apply to the nature of the building) to regulate a myriad of architectural details, from the nature of building shadows to colours and angular planes. These policies limited both the potential size of buildings and public value. Bill 23 narrowed the potential scope of a site plan, eliminating the ability for cities to apply site plan controls because of aesthetics or architecture. Other health, safety and environmental standards remain.

Notably, the bill also improved the impact of municipal site plans on new developments by allowing developments of up to ten residential units to be built with fewer municipal controls¹¹, helping create more small-scale and missing middle housing units.

Bill 23 also ensured affordable and inclusionary zoning units, non-profit housing developments, and attainable residential units from having to pay development charges.¹² This important change further reduces the cost of building affordable housing.

The Ontario Heritage Act was further amended, tightening the processes for heritage designations by allowing the Minister to overrule provincial and municipal officials. For example, if a municipal government decides that a building – that the average Ontarian would not consider a heritage building – should be protected, the Minister can intervene.¹³ This allows the Minister more authority over local decisions and helps ensure the heritage act cannot be abused by NIMBYs (i.e., Not In My Backyard).

Bill 97: Helping Homebuyers, Protecting Tenants Act, 2023

Another major step in the province's plan to tackle the housing supply and affordability crisis, changes to the Provincial Policy Statement under Bill 97 allowed the Minister to advance new regulations to adjust and change Provincial Policy Statements to align with housing growth objectives of the province.

Bill 97 also made changes to better protect Ontario's renters, including speeding up Landlord and Tenant Board approvals and emphasising the importance of stability and safety for tenants.

By introducing these and other changes in Bill 97, the province moved to take greater ownership and accountability for the policy framework and municipal planning, and directly signaled what is expected from municipalities to address the supply crisis, across the spectrum of housing.

Changes to Provincial Growth Plan

In May 2019, the government made key changes to the Provincial Growth Plan, allowing for expansion of settlement area boundaries without a municipal comprehensive review, as well as support for transit-oriented communities. In

April 2023, the government released the Proposed Provincial Planning Statement. This document combines policies from both A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2020, and the Provincial Policy Statement, 2020, with the goal of supporting the “achievement of housing objectives across Ontario.”¹⁴

This streamlining of major policy documents means that the province now has a single, comprehensive land use document that articulates the province’s vision. This will surely expedite development as it reduces administrative hurdles.

These proposed changes highlight the government’s priorities for housing in several critical ways. Key changes include the creation of the classification “fast-growing municipalities,” which refers to Ontario’s 29 largest municipalities. They are, under the proposed changes, required to consider strategic growth areas, and in the process identify a minimum density target.¹⁵ These municipalities shall: “delineate the boundaries of *major transit station areas on higher order transit corridors* through a new official plan or official plan amendment adopted under section 26 of the Planning Act. The delineation shall define an area within a 500 to 800 metre radius of a transit station and that maximizes the number of potential transit users that are within walking distance of the station.”

High density around transit stations is an important driver to increase overall density in areas that can most sustain higher population levels. The Provincial Policy Statement is a key starting point for cities to produce plans that are consistent with province-wide aspirations, such as the importance of regional travel. As we have started to see, the province is ensuring that municipal plans adhere to these important principles.

Changes to Municipal Plans: 2022–2023 and the Building Faster Fund

As noted, the Ontario Government has moved to strengthen accountability for municipal planning. In Toronto, the Ontario Government is looking to expand density around transit stations, among other changes, which would see a radical shift in the density of the city, as new inclusionary zoning measures are implemented.¹⁶ This would provide more housing in desirable areas that are close

to jobs, entertainment, and public services. These are generally areas where there is abundant infrastructure to accommodate more densification, and access to transit allows for easier mobility to get where they need to go.

In August 2023, the province launched the Building Faster Fund, a three-year, \$1.2 billion program that will create new funding for municipalities that are “on target to meet provincial housing targets by 2031.”¹⁷ It further explained that “municipalities that reach 80 per cent of their annual target each year will become eligible for funding based on their share of the overall goal of 1.5 million homes. Municipalities that exceed their target will receive a bonus on top of their allocation.”

Funding can be used to support “housing-enabling infrastructure,” with eligible expenses to be determined following consultations with the Association of Municipalities of Ontario, the City of Toronto, and the Housing Supply Action Plan Implementation Team.¹⁸

As previously recommended by the Ontario Real Estate Association (OREA), part of the funding will be allotted to “small, rural and northern communities” to ensure the challenges in housing they face will also be addressed in addition to those of larger communities.¹⁹

In conclusion, the steps taken between 2018 and 2023 provide a crucial roadmap to building housing in Ontario driven by real funding attached to real metrics. The province is providing both positive and negative incentives as part of their plan to address the housing supply crisis. This suggests the government understands that every policy tool available should be used, and that improving housing affordability and supply is essential to unlocking economic and social growth in the province. It is no longer a question of whether municipalities have the tools needed to make real progress on housing supply. Municipalities have a fully equipped toolbox, and the province can intervene if the municipality chooses not to use their tools. Now, local governments must open their toolboxes and use them.





Overview: Ontario Housing Affordability Task Force

The most important step the Ontario Government has taken in combating the housing supply crisis was the creation of the Housing Affordability Task Force. This group of experts from all areas of the housing stakeholder community provided a comprehensive examination of the housing supply challenge and detailed policy recommendations for provincial decision-makers. The Task Force was convened in December 2021 and produced its final report in February 2022.²⁰

The mandate of the Task Force was to “explore measures to address housing affordability” through the following general guidelines:

- Increasing the supply of market rate rental and ownership housing
- Building housing supply in complete communities
- Reducing red tape and accelerating timelines
- Encouraging innovation and digital modernization, such as in planning processes
- Supporting economic recovery and job creation
- Balancing housing needs with protecting the environment.²¹

The report includes a list of recommendations to the government on how to alleviate the housing crisis through concise and “common sense” legislative changes.²²

The Task Force report includes solutions that were devised to be highly feasible and ready for implementation.

The chair of the Task Force’s Letter to the Minister of Municipal Affairs and Housing included a list of themes that guided the solutions put forward:

- More housing density across the province
- End exclusionary municipal rules that block or delay new housing
- Depoliticize the housing approvals process



- Prevent abuse of the housing appeals system
- Provide financial support to municipalities that build more housing.
- In total, the Task Force set out 55 recommendations, covering various aspects of housing, from building times and standardization to applications and tax incentives. Out of those 55 recommendations, the province has implemented or made progress on 42 in under two years, and have begun moving on most of the critical elements. Though our analysis, we have found that the province has fully implemented 18 recommendations, made major progress on 9, made some progress on 15, and has not yet implemented 13 of the 55 recommendations.

What follows is a detailed examination of the recommendations and an update on the progress the province has made implementing them.



“In total, the task force set out 55 recommendations, covering various aspects of housing, from building times and standardization to applications and tax incentives.”



Progress on Housing Affordability Task Force Recommendations

The province of Ontario created the Housing Affordability Task Force, which provided 55 recommendations in its 2022 report. The government accepted this comprehensive report and its ambitious recommendations. This following provides an analysis of Ontario's efforts and examines progress on the task force recommendations.

No Progress

13

Some Progress

15

Major Progress

9

Implemented

18

Housing Affordability Task Force Recommendations Overview

- NO PROGRESS
- SOME PROGRESS
- MAJOR PROGRESS
- IMPLEMENTED

24 **Recommendation 1:** A bold goal of 1.5 million new homes in 10 years.

26 **Recommendation 2:** Amend the Planning Act, Provincial Policy Statement, and Growth Plans.

28 **Recommendation 3:** Limit exclusionary zoning in municipalities through binding provincial action.

30 **Recommendation 4:** Permit as-of-right conversion of underutilized commercial properties to residential or mixed-use.

32 **Recommendation 5:** Permit as-of-right secondary suites, garden suites, and laneway houses province-wide.

33 **Recommendation 6:** Permit as-of-right multi-tenant housing.

34 **Recommendation 7:** Encourage and incentivize municipalities to increase density in areas with excess school capacity.

36 **Recommendation 8:** Allow unlimited height and unlimited density in the proximity to major transit stations within two years if municipal zoning is insufficient.

38 **Recommendation 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).

41 **Recommendation 10:** Designate or rezone all land along transit corridors as mixed commercial and residential use and redesignate all Residential Apartment to mixed commercial and residential zoning in Toronto.

42 **Recommendation 11:** Support reasonable 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.

- 44 Recommendation 12:** Create a more permissive land use, planning, and approvals system.
- 46 Recommendation 13:** Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.
- 47 Recommendation 14:** Require that public consultations provide digital participation options.
- 49 Recommendation 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.
- 50 Recommendation 16:** Prevent abuse of the heritage preservation and designation process.
- 52 Recommendation 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.
- 53 Recommendation 18:** Restore the right of developers to appeal official plans and municipal comprehensive reviews.
- 54 Recommendation 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.
- 56 Recommendation 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.
- 58 Recommendation 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 a professional engineer, has stamped an application, the municipality has no liability, and no additional stamp is needed.
- 60 Recommendation 22:** Simplify planning legislation and policy documents.
- 61 Recommendation 23:** Create a common, province-wide definition of a subdivision plan and a standard set of conditions that clarify which may be included; require the use of standard province-wide legal agreements and, where feasible, plans of subdivision.

62

Recommendation 24: Allow wood construction up to 12 storeys.

63

Recommendation 25: Require municipalities to provide the option of pay on demand surety bonds and letters of credit.

64

Recommendation 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.

66

Recommendation 27: Prevent abuses of the Ontario Land Tribunal process.

68

Recommendation 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.

69

Recommendation 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.

70

Recommendation 30: Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets.

71

Recommendation 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.

72

Recommendation 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.

73

Recommendation 33: Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.

74

Recommendation 34: Prohibit interest rates on development charges higher than a municipality’s borrowing rate.

76

Recommendation 35: Review development charges, community benefit charges, and parkland.

78

Recommendation 36:

Recommend that the federal government and provincial governments update the 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 claw back.

79

Recommendation 37: Align property taxes for purpose-built rental with those of condos and low-rise homes.

80

Recommendation 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.

81

Recommendation 39: Eliminate or reduce tax disincentives to housing growth.

82

Recommendation 40: Call on the federal government to implement an urban, rural and northern Indigenous housing strategy.

85

Recommendation 41: Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.

86

Recommendation 42: Provide provincial and federal loan guarantees for purpose-built rental, affordable rental, and affordable ownership projects.

89

Recommendation 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.

90

Recommendation 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.

92

Recommendation 45: Improve funding for colleges, trade schools, and apprenticeships; encourage and incentivize municipalities, unions, and employers to provide more on-the-job training.

94

Recommendation 46: Undertake a multi-stakeholder education program to promote skilled trades.

96

Recommendation 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.

98

Recommendation 48: The Ontario Government should establish a large Ontario Housing Delivery Fund.

99

Recommendation 49: Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.

100

Recommendation 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 bylaws with open data standards. Set an implementation goal of 2025 and make funding conditional on established targets.

101

Recommendation 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.

102

Recommendation 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.

103

Recommendation 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.

104

Recommendation 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.

105

Recommendation 55: Commit to evaluate these recommendations for the next three years with public reporting on progress.



Recommendation 1: A bold goal of 1.5 million new homes in 10 years.

The first recommendation is to build 1.5 million new homes in ten years. The report highlighted how there needs to be a “focus on getting more homes built.”²³ As the first of the 55 recommendations, building 1.5 million homes is the backbone of the report, and the 10-year goal is reinforced by all the other recommendations.

The target of 1.5 million new homes is reasonable. Canada has the lowest amount of housing per population of any G7 country.²⁴ During the 1970s, Ontario constructed more housing units than in more recent decades, contributing to the supply shortage.²⁵

The government has therefore asked Ontario’s largest and fastest-growing municipalities to submit Municipal Housing Pledges,²⁶ which will serve to create targets for housing for 2031.

The target should be achievable. In fact, there are even more ambitious targets, such as the Canadian Mortgage and Housing Corporation’s, which suggests that for an affordability target level of 37% of after-tax income, 1.8 million new homes are required.²⁷ This is a reminder that given the rapidly increasing population in Ontario, 1.5 million new homes may not be enough. As such, any population forecast must be assessed through the lens of the housing supply crisis.

The addition of 1.5 million new homes in 10 years would improve the lives of many across Ontario, but it would also boost Ontario’s productivity. A recent article published in the *Journal of Economic Perspectives* titled *The Economic Implications of Housing Supply* found that limitations on supply and the high housing prices that follow limit “the movement of workers in areas with high productivity and high wages.”²⁸

Ontario's economic potential is being held back by the lack of housing. It is not just Toronto, North America's fastest growing tech market,²⁹ or Mississauga, named top international mid-sized "city of the future,"³⁰ that require greater supply. We are seeing record home prices across the province, from Niagara Region to North Bay, in Barry's Bay, and a myriad of other communities. More affordable housing supply would help those places grow their economies.

In addition, as the Task Force report states, "housing construction creates good-paying jobs that cannot be outsourced to other countries."³¹

The government acted quickly, adopting this first recommendation and, when announcing the More Homes Built Faster Act, explaining how the act is the "next step" in attaining the goal of building 1.5 million new homes.³²

However, despite adoption of the goal, preliminary data suggests it may not be reached given current trajectories. The 2023 Ontario budget indicates the benchmark of 150,000 homes per year, every year, to reach 1.5 million homes by 2031 is not being met. In 2022, just 96,100 homes were started, with numbers set to fall to 82,700 by 2025.³³ Furthermore, data from January 2022 to June 2023 indicated that only Brantford and Pickering are meeting their provincial targets, with many municipalities falling behind, including Mississauga, which ranked near the bottom.³⁴

We must accelerate growth in supply to address affordability, which is the basis of our recommendations within. Many of the measures and recommendations will take years before we see the impact, so action is needed – and quickly.

“The 2023 Ontario budget indicates the benchmark of 150,000 homes per year, every year, to reach 1.5 million homes by 2031 is not being met.”



Recommendation 2: Amend the Planning Act, Provincial Policy Statement, and Growth Plans.

Recommendation two is to amend the Planning Act, Provincial Policy Statement, and Growth Plans to ensure growth across the spectrum of housing supply, including further intensification “within existing built-up areas of municipalities” as a top priority. This recommendation aims to address the complex and diverse rules in legislation, policy, plans, and bylaws to ensure clear direction on the “overriding priorities for housing.”

The Provincial Policy Statement was previously amended in 2019 by the government from its 2014 iteration. Changes included increasing the 20-year planning horizon to 25 years, as well as adding the term “housing options” to define types of housing.³⁵ Furthermore, it included content aimed at facilitating an increase in housing more generally, including allowing authorities to streamline the processes of creating housing.

“Changes included increasing the 20-year planning horizon to 25 years, as well as adding the term “housing options” to define types of housing.”



Recommendation 3: Limit exclusionary zoning in municipalities through binding provincial action.

The factors relating to this recommendation are chiefly zoning issues, and it seeks to balance property rights and community interests via policy modernization and “as-of-right” zoning. “As-of-right” zoning provides clarity and efficiency in the land development process while still allowing for local government oversight in the form of zoning regulations and district designations.

The full recommendation contains two specific areas for 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 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.).

Zoning laws in Toronto, for instance, are skewed towards detached and semi-detached houses. The Task Force cites how an estimated 70% of housing-permissible land in Toronto is zoned for only detached or semi-detached housing.³⁶

According to the Toronto Board of Trade, 45,000 people would be housed by simply adding “one home to every hectare of Toronto’s Yellowbelt.”³⁷ “Yellowbelt” refers to those neighbourhoods that allow only a detached house and secondary suite, rather than being zoned for more inclusionary types of homes, accessible to more people.

For years, Toronto pushed against any limitations on exclusionary zoning, but now has moved swiftly and decisively to reverse course and allow multiplexes across the city as-of-right.

While Bill 23 made some progress by allowing three units per lot in areas where municipal services are available,³⁸ further action is still needed to zone the province for up to four units as-of right, which the Task Force suggested. Individual cities are starting to lead the way on ratcheting up this four-unit threshold, such as Toronto, Guelph and London.

The Task Force and provincial government should be credited for creating the conditions that led to the City of Toronto's New Framework for Multi-Tenant (Rooming) Houses, a further step away from exclusionary zoning. Taking effect in March 2024, the framework will enable city-wide zoning standards and licensing requirements for multi-tenant houses. It also stipulates that the minimum room size would be regulated by the Ontario Building Code.

The political will of Toronto, and other municipalities, to move on this should embolden and encourage the provincial government to limit exclusionary zoning across all of Ontario, as the Task Force recommends.

“The political will of Toronto, and other municipalities, to move on this should embolden and encourage the provincial government to limit exclusionary zoning across all of Ontario, as the task force recommends.”



Recommendation 4: Permit as-of-right conversion of underutilized commercial properties to residential or mixed-use.

In downtown Toronto, the commercial heart of Canada, office space vacancy was at 15.3% as of Q1 of 2023.³⁹ In suburban Toronto, that rate skyrockets to 20.1%. In London, the office vacancy rate is a whopping 22%. These underutilized commercial properties could be redeveloped and revitalized as residential or mixed-use properties.

The government has updated the conversion process of employment lands as part of the recent Provincial Policy Statement changes, allowing for more flexibility on when changes could happen and encouraging cities to facilitate the redevelopment.⁴⁰ However, in order to create meaningful and consistent change, a provincial as-of-right order is required. The province must also ensure this conversion goes beyond “brownfield” sites and applies more readily to many other kinds of sites.

Ontario can do more to unleash the potential of commercial properties as viable spaces for housing. This can help both address the housing supply crisis and a growing commercial real estate realignment following the pandemic, as many businesses now need less commercial real estate. This can and should include mixed use commercial and residential re-development. It also can mean increasing density above low-rise commercial buildings along downtowns in smaller communities, or along major roads in larger ones.

There are practical challenges, both regulatory and physical, to converting commercial real estate to residential. Permitting conversion would allow the private sector to explore innovative approaches to overcome those challenges and bring new residential housing to market. The government ought not stand in the way.



Recommendation 5: Permit as-of-right secondary suites, garden suites, and laneway houses province-wide.

This recommendation is critical for first-time homebuyers who are looking to get into the property market and will be a key piece in addressing the housing crisis. This policy change benefits both existing homeowners who can unlock additional value from their properties (helping to ease affordability challenges in a high-interest rate environment), and first-time homeowners who can now attain a home. There is demand for these types of properties as they are often located in desirable neighbourhoods and close to public transit.

There are approximately 2,400 publicly owned laneways in Toronto. Adapting these to provide creative and innovative housing will help alleviate shortages in the tightest housing markets.

The cost to build a laneway suite, which is an addition to an existing structure (not to be confused with a laneway house, which is a new structure not attached to an existing building) ranged from \$300,000 to \$600,000 in 2021.⁴¹ Adjusting zoning to free up the unused spaces in cities like Toronto is critical. It will both improve housing supply in downtowns and increase density, which supports transit and active transportation.

Through Bill 108's amendments to the Planning Act, the government has led the effort in permitting as-of-right laneway houses, garden suites, and secondary suites. The legislation permits two additional residential units in a house, and one residential unit ancillary to a house.⁴²

Recommendation 6: Permit as-of-right multi-tenant housing.

This recommendation recognizes the need for multi-tenant housing (or put simply, rented rooms within one's home) as part of the mix of available options across the province. Allowing homeowners to choose to rent their unused or extra rooms – without having to seek additional approvals – is common sense. Historically, Toronto's "Yellow Belt" (defined as neighbourhoods zoned for only detached dwellings and preventing higher-density developments), which covers approximately 70% of the city, has seen decreasing population density in recent years⁴³ – a sign significant opportunity for increased capacity exists within Ontario's urban neighbourhoods.

This change would be an immediate "win" in increasing housing supply and open more rental options in every neighbourhood and community. It's a creative solution that leverages existing housing, adding tremendous benefits to renters across Ontario. It could help many workers lower their commute times, offer families more choice for schooling, or help young adults be able to live closer to family and friends. This would provide more choice in location for many Ontarians and assist in improving the quality of life for many.

Multi-tenant housing continues to be a highly practical, highly affordable solution to the housing woes of Ontarians, but this recommendation has not yet been implemented. In Toronto, City Council adopted a new multi-tenant regulatory framework, which has brought some more supply onto the market, however the uptake has not been large enough to make a significant impact. Province-wide action could help.

Recommendation 7: Encourage and incentivize municipalities to increase density in areas with excess school capacity.

Moving on this recommendation will make it easier for families with children to find a school closer to home, which has numerous benefits for children.⁴⁴ Numerous underutilized schools have been identified; for instance, schools in “downtown-adjacent neighbourhoods . . . such as Harbord Village and Dufferin Grove” in Toronto fall into this category.⁴⁵

The Toronto District School Board periodically monitors a school’s enrolment to determine if it has capacity for out-of-area students.⁴⁶ But provincial incentives would help to increase density in the area itself, creating stronger local communities, which is better for children and their families.

Additionally, research suggests some Canadian couples are not having as many children as they would like, and many families cite financial challenges and difficulty affording a home as a specific reason.⁴⁷ Through densification, some of the affordability challenges could be addressed. Densification does not have to mean high-rise condominiums; but could also include low-rise semis or mixed-use multi-unit dwellings as good alternatives.

The government has made some progress, with Bill 108, making amendments to education-related development charges, including the ability to reallocate revenue from these charges into projects that would reduce land costs and address the needs of students, by Board request.⁴⁸ This change ultimately creates planning flexibility and efficiency for the government, which will

ensure that new schools can be funded in areas of growth at a lower cost to taxpayers.

In addition, Bill 108 allowed for “localized education development agreements,” that would allow landowners to work with school boards to provide land for student accommodation, as long as the board agrees to waive education development charges against the land.”⁴⁹ The government should take further action to encourage this, as it benefits residents tremendously – and ultimately, benefits all taxpayers by ensuring schools do not remain underutilized.



“Moving on this recommendation will make it easier for families with children to find a school closer to home, which has numerous benefits for children.”



Recommendation 8: Allow unlimited height and unlimited density in the proximity to major transit stations within two years if municipal zoning is insufficient.

As the cities of the future look increasingly like smart cities—that is, places that promote sustainability and productivity—intensification around transit is clearly needed.

Residents of cities are increasingly concerned with livability and quality of life. Research has consistently shown cities that deliver these priorities often do so by expanding transit mobility.⁵⁰ More housing near transit gives more residents unparalleled access to cities' transit networks, fueling greater productivity.

While densification is key within major downtown transit areas, it's also becoming more important in suburban neighbourhoods. For instance, the Toronto Transit Commission's Sheppard Line subway, a high-intensity transit corridor, serves several different housing densities. A 2016 project between the McMaster Institute of Transportation and Logistics and the Government of Ontario suggested that suburban stations would “benefit from transit-oriented intensification in the future.”⁵¹

Ambitious reform of as-of-right zoning around transit stations in urban and suburban areas to allow for unlimited height and density is a critical policy change that would expediate housing supply in high-demand areas. The government has a decision pending on transit-oriented communities, including potential zoning changes for Toronto. This is a major opportunity not to be wasted, following in the footsteps of British Columbia, whose government announced landmark legislation enabling increases to density

around major transit hubs by prescribing minimum density and height requirements. For example, any new condo developments within 200m of a SkyTrain station in Metro Vancouver would have a minimum 20-story tower. Once passed, this would eliminate restrictive zoning bylaws and minimum parking requirements within 800m of major transit hubs in a variety of municipalities, including Metro Vancouver, Victoria and Kelowna.⁵²

Ontario must consider similar bold requirements in major urban areas with underdeveloped neighbourhoods within 800m of transit.



Recommendation 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).

In many municipalities, minimum parking requirements for new housing units are unilaterally in place – even on streets with accessible public transit. Requiring new housing developments to have a minimum number of parking spots only adds unnecessary costs and creates red tape delays.

Governments provide transit expressly to let people get around without a car, and as such minimum parking requirements are often unnecessary in a new mid-rise development within walking distance of a subway, or in a dense, walkable urban area where many tenants do not own cars. In fact, data from RESCON shows that one in three parking spots goes unsold in new condo projects,⁵³ and the Task Force notes such requirements can add as much as \$165,000 to each new housing unit – costs that are passed onto buyers.⁵⁴ These outdated bylaws not only increase the cost of housing, but are becoming even less relevant as transit infrastructure improves, and new technologies like rideshare services hit the market.

Toronto has recognized the need for change, and stopped requiring parking where transit is available. It’s time for other cities to follow suit. There needs to be flexibility in Ontario’s zoning laws to allow the market to dictate how much parking ought to be required, rather than a one-size fits all approach for developments.

This shift, however, should be balanced against other public policy priorities, such as encouraging pro-family residences where a vehicle might need to be accommodated.





Recommendation 10: Designate or rezone all land along transit corridors as mixed commercial and residential use and redesignate all Residential Apartment to mixed commercial and residential zoning in Toronto.

This recommendation is key to creating a thriving diversity of housing and commercial spaces along transit corridors. By creating commercial opportunities for residents, neighbourhood economies will see new investment and employment opportunities.

Thus far, there has been little movement on this from the government, however, further amending zoning is critical for creating new opportunities for Ontarians to find housing. In particular, the province has been deliberating on official plan amendments – mostly in areas along transit lines – from the City of Toronto for over a year.

In addition to other issues around Toronto needing to increase density around transit stations, Toronto's official plan is not actually consistent with creating mixed use properties around transit stations. Toronto's current official plan requires any major conversion of office space to residential be offset with an equivalent amount of office space elsewhere, or on-site. This is not typically economically feasible for a single developer to accommodate, and only perpetuates existing office-only land use around transit stations. As the province is the main body overseeing municipal official plan decisions, it must override official plan policies, like Toronto's, that work against rezoning to create mixed communities.

Recommendation 11: Support reasonable 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.

Densification alone is not the solution to our supply crisis and Ontario does not lack for land. While respecting critical conservation areas, building on underdeveloped land will help create a strong housing market in which supply is consistent, costs are low, and communities thrive.

Ontario's municipalities should seek to use underdeveloped land to provide homes for Ontarians to meet housing targets and ensure the province builds enough homes to keep up with population growth. Unfortunately, this is not always the choice made by local city councils. For example, the population of Hamilton is set to increase by 800,000 people by 2051, however the City's official plan is at odds with the Provincial Policy Statement and Ontario's housing aspirations.

The Ontario Government must have the political courage to ensure that municipalities are increasing housing supply in lockstep with growth projections. Previously utilized tools, such as MZOs, amendments to official plans, and urban boundary changes must remain available to address municipal NIMBYism and related

roadblocks to housing supply. As the priorities of our communities and growth plans will always be changing with market dynamics, this recommendation will never be 'fully implemented'. Current and future governments will need to regularly review and assess Ontario's land-use needs, adjusting municipal plans and working with local councils to ensure alignment with provincial priorities.



“Densification alone is not the solution to our supply crisis and Ontario does not lack for land.”



Recommendation 12: Create a more permissive land use, planning, and approvals system.

This recommendation aligns with several others on zoning and parking requirements, and includes a number of sub-clauses:

- a) Repeal or override municipal policies, zoning, or plans that prioritize the preservation of physical character of neighbourhood.
- 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.
- 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,

“Implementing this recommendation could alter the fabric of Ontario’s cities in major ways by creating predictable standards for all aspects of neighbourhood design at the provincial level, rather than locally.”

and type of materials, window details, etc.) to the Planning Act and reduce or eliminate minimum parking requirements.

d. Remove any floorplate restrictions to allow larger, more efficient high-density towers.

Implementing this recommendation could alter the fabric of Ontario's cities in major ways by creating predictable standards for all aspects of neighbourhood design at the provincial level, rather than locally. While we understand the Task Force's rationale – local standards can be overly prescriptive and local processes are open to abuse by those opposed to any development – too much centralization might not be advisable. For example, prescriptive rules on physical building requirements could do more harm than good. We would suggest general guidance, with minimum standards, as a better approach, with intervention when local conditions are clearly hampering development.

Thus far, in Bill 23 the government brought forward changes that when combined with other regulatory changes has made significant progress on this recommendation. Specifically regarding site plan control.⁵⁵ Bill 23 amends the City of Toronto Act, 2006, limiting how much of a structure's exterior design could be controlled. An exception is in place for instances where health, safety, accessibility, sustainability, or protection of adjoining land are affected.⁵⁶



Recommendation 13: Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.

Too often, a situation arises in which an endless stream of meetings is held, enabling a form of filibustering that delays or even stops the building of new homes. Some NIMBY councillors will create a series of meetings about a project with the community that are not part of the official municipal review process, causing lengthy delays. The Task Force notes that Mayors and Councillors across Ontario have called for limits on consultations to address this issue. Additional consultations create further response burden on the developer and adds uncertainty as to what review process they will face within a city, even when there are clearly outlined official review policies.

This recommendation aims to address that by streamlining public consultations so they can no longer be used by anti-development NIMBYs to roadblock progress on new homes. Almost 80% of Ontarians want zoning in urban areas that will encourage more homes, suggesting that those vocally opposing development are in the minority.⁵⁷ However, no clear progress has been made on limiting where, when and how views can be put forward after Planning Act requirements are met.

Recommendation 14: Require that public consultations provide digital participation options.

As more of the world shifts online, this proposal would allow for public consultations to be conducted virtually rather than in person, saving time and money. Consultations could fit into an individual's already busy schedule, allowing greater flexibility for participants. Digital options could help increase the number of participants as people could provide feedback from work, home, or elsewhere. Thus far, the government has not moved on this recommendation.

“Consultations could fit into an individual’s already busy schedule, allowing greater flexibility for participants.”



Recommendation 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.

Qualified staff and third-party technical consultants are subject matter experts. They can help move site plans forward when elected officials are slow to alleviate a housing crisis. City council does not need to get into the details of every project, and technical planning decisions such as minor variances and site plan approvals should be depoliticized and delegated to qualified municipal staff. Project proponents facing municipal council decisions on matters specific to the proposed building should not face the additional risk, time and cost associated with uncertain votes and timing at Council.

Bill 109 responds to this proposal and the government has signaled its intention to follow through by requiring delegation of site plan controls to municipal staff – typically professional planners – who have the professional qualifications and expertise to evaluate issues, understand technical matters, and approve drawings in a timely manner.⁵⁸

Recommendation 16: Prevent abuse of the heritage preservation and designation process.

Heritage preservation is a key element of making cities sustainable and climate friendly in the long term.⁵⁹ Indeed, the beautification of our cities relies on incorporating and protecting old buildings that provide us with a shared sense of the past and remind us that development can be both beautiful and sustainable.

Heritage preservation is tied to sustainable development, and, accordingly, as engineering and construction analysis has demonstrated, can help advance the United Nations' 17 Sustainable Development Goals.

However, there has been a trend in which bulk heritage property listings are unscrupulously used in an attempt to block construction of housing. This exacerbates the housing crisis while adding nothing in the form of solutions. Such abuse of the heritage preservation designation undermines the important role it plays in preserving the beauty and integrity of our cultural heritage.

This recommendation comes with two specific action areas:

- 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

The government has made progress on this file, with Bill 23 addressing the concerns by allowing Heritage Conservation District Plans to be amended, and, crucially, through a new subsection preventing councils from relisting any non-designated properties for five years.⁶⁰

Ontario is on the right path to finding the appropriate balance between protecting our architectural heritage, history, and culture, while continuing to support the development of properties that add much needed housing supply into the market.



Recommendation 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.

To help ensure the economic viability of land is fully realized, this recommendation provides an incentive for properties to be utilized for their “best economic use of land.” By creating the conditions for property owners to be compensated, it will help to preserve and maintain the cultural heritage of developments through incentivizing owners to find ways to redevelop heritage buildings, instead of allowing them to fall into decay and disrepair. This could help preserve more heritage sites while also increasing housing supply. Ontarians are proud of their heritage, and many want to live in preserved, updated, and sustainable heritage properties.

The government has yet to take decisive action towards this goal.

Recommendation 18: Restore the right of developers to appeal official plans and municipal comprehensive reviews.

Developers are experts who raise the capital to develop land and build the homes we live in. As such, they are key stakeholders in remedying the housing crisis. They should be empowered to appeal official plans if those plans are punitive or unreasonable. Previously, the Official Plan Amendment and municipal comprehensive review process had been structured to only allow for periodic, municipal-led reviews every five years.

The government has made this issue effectively moot through changes in the Provincial Policy Statement allowing for regular review, thus making this recommendation effectively implemented.

“Developers should be empowered to appeal official plans if those plans are punitive or unreasonable.”

Recommendation 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.

As the Task Force final report states, unnecessary delays create unnecessary costs. During a housing crisis, this is irresponsible. Data from the Ontario Association of Architects shows that the monthly cost of delays for a 100-unit building approached \$193,000.⁶¹ That is sunk capital for no real reason. The report also gives the example that in 1966, it took just seven months to approve a plan for a town subdivision that included a school, a mall, parks, and 529 housing units. In 2013, for a project to be built on residential land, after many consultants, dollars, and conditions it took 10 years to receive final approval. That's not progress.

With Bill 109, Ontario has taken action to legislate timelines. However, there appears to be no clear penalty for cities if they decide not to approve an application simply to avoid going over time. The government could strengthen the steps it has taken to partially implement this proposal by providing a further penalty for municipalities who decide to not approve an application to avoid being penalized for delays. In addition, this timeline only applies to site plan and zoning reviews. Other approvals such as minor variances and provincial reviews should also have express timelines.



Recommendation 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.

Approval facilitators, if empowered to mediate disputes between provincial and/or municipal authorities to ensure timelines will be met, could help alleviate areas where there has been historically slow response from authorities. This would thereby allow for more housing to be built at a quicker pace.

The Ontario Government committed to a strong role for the office of Provincial Land and Development Facilitator. Bill 97 created room for the office of Provincial Land and Development Facilitator or Deputy Facilitator to be appointed under subsection 12 (2) of the Ministry of Municipal Affairs and Housing Act.⁶²

“Approval facilitators, if empowered to mediate disputes between provincial and/or municipal authorities to ensure timelines will be met, could help alleviate areas where there has been historically slow response from authorities.”



Recommendation 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 a professional engineer, has stamped an application, the municipality has no liability, and no additional stamp is needed.

Development applications are often overly complex, and approvals can be costly - not just the processes themselves, but the time spent waiting for approvals. In fact, the Task Force cites how a delay on a low-rise construction can often add up to more than \$70,000 in costs for a 2,000 sq. ft. property in the Greater Toronto Area.⁶³

Creating a “binding list” would add clarity and precision to the applications process. It would deliver housing approvals in a timely manner and create real dialogue at the outset of the application process, advancing a productive approach to housing consultation.

This proposal could be fully implemented through the creation of a provincial framework, instead of the current suggestion, which is for more complex applications. The government has mandated providing upfront guidance, encouraging pre-consultation, and prioritizing applications on importance.⁶⁴

The government should consider fully implementing this proposal by providing greater details on how it will encourage pre-consultation and triaging work. This should be a requirement, not an option. In addition, the government should include pre-consultations within the legislated timeframe for reviews.

“Development applications are often overly complex, and approval can be costly - not just the processes themselves, but the time spent waiting for approval.”



Recommendation 22: Simplify planning legislation and policy documents.

The steps taken by the government to amend the Planning Act to create simple, transparent, and coherent guidelines and policy documents governing housing have had good results for Ontario.

The government has taken subsequent steps to simplify, standardize, and modernize planning legislation and policy documents over the course of its mandate. This is a general recommendation, and one that can spur consistent updates as the housing landscape changes. Future governments should consider more ways to simplify legislation and planning documents.

“The steps taken by the government to amend the Planning Act to create simple, transparent, and coherent guidelines and policy documents governing housing have had good results for Ontario.”

Recommendation 23: Create a common, province-wide definition of a subdivision plan and a standard set of conditions that clarify which may be included; require the use of standard province-wide legal agreements and, where feasible, plans of subdivision.

A province-wide housing crisis demands province-wide solutions. The government has taken action to address concerns for the stipulations of subdivision, which is the process of splitting up the ownership of a single plot of land into smaller units. This process of subdivision is critical for transforming large sites, such as former factories or greenfield land, and making them available for homeowners to buy a single residential property.

This proposal was partially implemented through Bill 23; however, a province-wide standard agreement or template does not yet exist. This is a highly specific recommendation that should follow the establishment of more general changes, such as through the finalization of changes to the Provincial Policy Statement.

Recommendation 24: Allow wood construction up to 12 storeys.

Constructions using “mass timber” – wood specifically designed to be strong and bear weight – can provide a low-cost alternative building material to reinforced concrete. However, the Task Force report describes how Ontario’s building code was “hampering its use.” Both Quebec and British Columbia utilize wood frame construction of up to 12 storeys, but Ontario limited construction to six storeys.

Beyond cost-savings, there are two additional reasons to support the use of mass timber for housing: it is a “renewable resource that naturally sequesters carbon,” and it also supports Ontario’s forestry sector, thereby contributing to the province’s economic growth. One architect cited how the use of cross-laminated timber helps maximize efficient building, using the example of a four-storey housing development in Kitchener that took just one year to complete and is a net zero project.⁶⁵

This common-sense recommendation has been fully implemented, thanks to a 2022 amendment to the *Ontario Building Code* (Ontario Regulation 451/22) that allowed up to 12 storeys of encapsulated mass timber buildings.⁶⁶

“Constructions using “mass timber” – wood specifically designed to be strong and bear weight – can provide a low-cost alternative building material to reinforced concrete.”

Recommendation 25: Require municipalities to provide the option of pay on demand surety bonds and letters of credit.

The Task Force final report details how pay on demand surety bonds are a better option for builders compared to letters of credit. It also noted how municipalities such as Hamilton, Pickering, Innisfil, and Whitchurch-Stouffville already accept pay on demand surety bonds.

In outlining the problem with letters of credit, the Task Force noted how the issue with letters of credit is that a requirement to collateralize the letter dollar-for-dollar against the value of the municipal works the developer is performing.⁶⁷ This hinders further projects, as most developers can only afford to finance one or two projects at a time under this model. Up until the 1980s – during a time when Ontario was much more successful at building housing – it was common practice for bonds to be used as financial security.

With Bill 109, the government moved forward with this recommendation, and the final filing of regulations will complete this recommendation. The new section 70.3.1 grants the Minister the authority to “make certain regulations respecting surety bonds and other instruments in connection with approvals, with respect to land use planning.”⁶⁸ As the government has passed the legislation to enact this largely technical measure, it is nearly fully implemented.

Recommendation 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.

All Ontarians prosper when housing is built efficiently. Attempting to block housing construction for minute objections is irresponsible when perennial appeals take place, they not only block crucial housing from being created, but waste the time of the Ontario Land Tribunal (‘the Tribunal’).

At the beginning of 2022, there were 1,300 unresolved cases before the Tribunal. With the land and resources in Ontario, that number should be much lower. However, the appeals process has become significantly overloaded and has resulted in housing projects being delayed for years in some cases, according to the Task Force.⁶⁹

Appeals should not be filed simply because activists oppose development. If residents have legitimate concerns, they should be able to provide sufficient reasoning, relying on evidence and experts. This change will help to address the tremendous backlog of the Tribunal, freeing up public resources to address real concerns.

The government has not provided a clear, committed timeline for preventing abuse of the appeal process. With Bill 23 in its initial proposal, major changes to the Ontario Land Tribunal and appeal process were expected; however, the government decided to re-evaluate this proposal after receiving push back.⁷⁰



Recommendation 27: Prevent abuses of the Ontario Land Tribunal process.

Along with recommendations 26 and 28–31, this recommendation includes several specific measures to change the appeals process, ensuring that, as the Task Force explains, “only meritorious appeals proceed.” They are:

- 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.
- 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.

This recommendation is crucial to ensuring the timely creation of housing. Perpetual appeals mean a perpetual housing crisis. The government has been a guiding force in reforming the appeals process, and now is the time to ensure it fixes the systematic issues that delay much needed housing supply.

However, the government’s original proposed amendments to the Ontario Land Tribunal initially went further than what the Task Force suggested. The government looked to eliminate all third-party appeals on matters such as changes to official plans and zoning – an over reaction, as some third-party appeals are indeed highly justifiable. For example, an industrial plant with noxious fumes would want to prevent neighboring plot from being rezoned to residential to avoid liability.

Although the government decided to withdraw some of the changes to the Tribunal process, other changes on limiting appeals did make it to the final implementation.

To meet the standard of fully implemented, much more action is needed, as recommended by the Task Force. We encourage the government to fulfill this commitment and believe the long-term structural gains will be worth any short-term criticism.

“This recommendation is crucial to ensuring the timely creation of housing. Perpetual appeals mean a perpetual housing crisis.”



Recommendation 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.

Oral decisions are important to the way the Tribunal works. By setting the stage for them to become more commonly issued on the day of the hearing, followed by written reasoning, the Tribunal will provide faster service to those who are appealing. The Tribunal is providing updated training, encouraging more use of oral decisions where appropriate.



Recommendation 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.

The Tribunal has become too politicized and anti-housing advocates have used this system to effectively halt development of much needed housing supply. To address this abuse, the Tribunal should be able to implement damages if there are frivolous efforts to delay approvals. This will ensure that cities do not reject approvals to avoid a loss of application fees, and that if they do, developers know they will not be financially harmed for the extra process and time it takes to pursue an appeal.

This recommendation would help improve efficiency of the under-resourced Tribunal and is similar to previous provincial efforts to improve service standards at the Landlord Tenant Board.⁷¹ Any implementation should be in harmony with recommendation 19, regarding timelines for the review process.

“The Tribunal has become too politicized and anti-housing advocates have used this system to effectively halt development of much needed housing supply.”

Recommendation 30: Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets.

It is encouraging to see the government has made investments to end the severe backlog and consistent delay in decisions, as well as address the other issues that prompted the Task Force to make these recommendations. While these changes have been implemented, with 1,300 cases remaining unresolved, the Tribunal could use even more talent to augment its ability to deliver decisions in a timely manner.

Additionally, the Landlord and Tenant Board would also benefit from this increase in staffing. Good appointments and a higher budget mean a better functioning system—creating reliable results for all Ontarians. The government has allocated \$6.5 million towards the Tribunal. The challenge now will be for the Tribunal to recruit good adjudicators to execute on the government’s action.

“It is encouraging to see the government has made investments to end the severe backlog and consistent delay in decisions.”

Recommendation 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.

It is necessary to prioritize projects that will immediately contribute to some of the other recommendations already enacted by the government; chiefly, those that will work in tandem to create intensification and long-term housing growth. In addition, decisions that affect necessary household needs, such as those regarding hydro or utilities, will help to unlock the long-term growth of Ontario.

The province has made progress on encouraging the Tribunal to expedite approvals with greater funding. It is too soon to say whether the Tribunal has met this goal. It is entirely appropriate for the government to apply pressure on the Tribunal to prioritize the most important files, as this does not in any way influence the outcome of the decision but does ensure that the public interest is put first and foremost. Governments need to apply more appropriate and non-preferential pressure on administrative bodies to be efficient and to prioritize the most important files first.

Recommendation 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.

This recommendation has seen little progress. While it was peripherally addressed through Bill 108, with the exemption from development charges for second dwelling units in new residential buildings by amendment to the Development Charges Act, this recommendation should be expanded to the full Task Force specifications.⁷²

In 2019, the City of Toronto held \$644 million in parkland cash-in-lieu payments, which suggests that the city was possibly collecting more than it needed to. Waiving the development charge for smaller infill residential projects of up to 10 units can save money, while not shortchanging a cities ability to invest in new parklands.⁷³

Smart policy leads to satisfactory results, and this would create tremendous opportunity for infill residential projects by incentivizing their creation. However, the government must understand the fiscal effect of this proposal to cities, especially considering Bill 23, and have a plan to address the implications.

Recommendation 33: Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.

Development charges can be an onerous aspect of the development process, particularly when it comes to building affordable housing. In Ontario, charges can be as much as \$135,000 per home, and are often passed onto the consumer. The Task Force highlights how some municipalities have seen increases in development charges up to 900% in 20 years.

Waiving development charges on affordable housing has set Ontario on the right path, incentivizing the creation of affordable housing developments. With Bill 23, the government has amended the Development Charges Act, 1997 and waived the development charge on residential units intended to be affordable for 25 years or more.⁷⁴ This is strong action to create the conditions for long-term affordable housing in Ontario, and the government has additionally announced an intention to further address this with legislation to come in Fall 2023.

Related to this recommendation, the province has also made a change on the definition of affordable housing in Bill 134.⁷⁵

Recommendation 34: Prohibit interest rates on development charges higher than a municipality's borrowing rate.

As interest rates increase, so do costs for developers, as municipal development charges can be significantly impacted by a higher interest rate environment. These increased interest costs result in reduced profit margins, higher financing costs, and increased projects costs that are often passed onto the consumer. In turn, this can negatively impact creation of affordable developments and often discourages developers from initiating new projects, further reducing new supply of homes.

Interest rates that are not consistent with a municipality's borrowing rate do not make sense in the context of housing. With Bill 108, the law changed to permit annual installments of development charges⁷⁶ However, the legislation also allowed cities to levy a very high interest rate on the installments, from the date the development charge would have been payable to the date the instalment is paid.⁷⁷ This opened the door for cities to charge high interest rates – and so, the government fixed this with Bill 23, providing a maximum interest rate that this is no more than 1% above the average prime rate provided by major banks.⁷⁸



Recommendation 35: Review development charges, community benefit charges, and parkland.

Ontario municipalities have been collecting far more in development-related charges than they have spent. A study by the C.D. Howe Institute found the total development charges collected in 2021 reached more than \$4 billion. However, only a little more than half of the amount of those development charges was actually spent.⁷⁹

To address this imbalance, this Task Force recommendation includes two parts:

- 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.

Part 'A' of this recommendation has moved forward with regulatory provisions in Bill 109 requiring more disclosure of incurring capital costs related to development charges collected.

Part 'B' needs to be fully implemented through legislation and should only emerge after the completion of capital costs. The extent of this problem will become apparent after the audits have been completed, and the province is right to hold off on detailed implementation until all the facts are available.



Recommendation 36: Recommend that the federal and provincial governments update the 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 claw back.

Harmonized Sales Tax (HST) is applicable to new housing in Ontario, with both the provincial and federal governments providing a rebate. However, the antiquated maximum home price eligible for a rebate is just \$450,000 federally and \$400,000 provincially, resulting in a rebate of \$6,300 federally and \$24,000 provincially—less than half of the average home price today in Ontario.⁸⁰ As the C.D. Howe Institute has explained, this effectively makes the rebate obsolete.⁸¹

The Task Force explained how both the provincial and federal governments should be indexing the thresholds to housing prices. Housing costs should not be made even more extreme by decades-old numbers. The province has called on the federal government to act, but should act itself on updating GST and HST thresholds.

Ontario has committed to lifting the Provincial Sales Tax from new rental construction in the wake of the federal government announcing it will create a 100% GST rebate for rental construction.⁸² This is major progress.

Recommendation 37: Align property taxes for purpose-built rental with those of condos and low-rise homes.

From 2012 to 2016, a drastic increase was seen in the number of detached homes purchased and subsequently listed within one year for rent. Newmarket saw an extreme increase, from just over 5% of home purchases converting to rentals in 2012, to over 20% of purchases being converted into rentals four years later.⁸³ Though not as drastic, similar year-over-year increases are consistent in Oshawa, Brampton, Toronto, Markham, and Richmond Hill.

Investors are willing to put capital towards housing, however rental supply is hindered by a lack of economically viable motivations for investors to put capital towards purpose-built rental projects.⁸⁴ In some municipalities, property taxes on purpose-built rentals can be up to 2.5 times higher than those on condos or other owned homes – making purpose-built rentals a more expensive project to fund.

The Task Force offers several solutions, including aligning property taxes for purpose-built rentals with those of condominiums and low-rise homes.⁸⁵ This is especially significant for major cities. For example, in 2023, Toronto's property tax rate for multi-residential properties (apartments) are almost double the rate for new multi-residential properties and single-detached residential. With over 80% of Toronto's purpose-built rental supply created before 1980, there is an obvious need for policy change to drive rental growth.

The province has announced consultation with municipal governments towards this end, but these types of consultations create more process when progress is needed.

Recommendation 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.

A land lease, also known as a ground lease, is a legal agreement in which a landowner (the lessor) allows another party (the lessee) to use their land for a specified period in exchange for periodic payments. The lessee can use the land for various purposes, such as building commercial properties, residential buildings, or agricultural activities, depending on the terms outlined in the lease agreement. This allows landowners to generate income from their property while retaining ownership and offers lessees the opportunity to use land without the high upfront costs of purchasing it outright.

Land leases are often used when a landowner leases property to a developer to build homes, however, as the Tast Force report describes, the Planning Act limits land leases to a maximum of 21 years. This restrictive provision prevents land lease homebuyers from accessing the same type of mortgages those buying through traditional homeownership are offered. The Perpetuities Act additionally has a 21-year limit on any options placed on land, limiting innovative non-profit models from using equity formulas for re-sale and repurchase of homes.⁸⁶

The government has amended this through Bill 23, by extending the limit to “not more than 49 years”.⁸⁷

Recommendation 39: Eliminate or reduce tax disincentives to housing growth.

While increasing supply will have an effect on housing affordability, there are other challenges aspiring homeowners face when attempting to enter the market. Innovative models can help, such as rent-to-own programs or shared equity models. However, disincentivizing tax structures result in a stifling of housing growth. For example, Ontario's Land Transfer Tax (LTT) is charged each time a home is sold, and in Toronto, there is a second Municipal Land Transfer Tax (MLTT) collected by the city. This creates a double-tax in rent-to-own/equity building models, where LTT is paid first by the home equity organization, and then paid again by the occupant when they buy the unit."⁸⁸

The LTT has consistently been found to be an economically costly tax, and analysis has demonstrated how it can effectively reduce the number of real estate transactions occurring. It means people aren't living in the homes they truly want to live in. In particular, the economic cost of Toronto's MLTT is severe. Governments should be creating incentives for housing growth, not the opposite.⁸⁹

The government ought to completely abolish the LTT and outlaw municipal versions of it as well. If the Province is worried about lost revenue, it could either cut expenditures or find revenue from less economically and socially costly taxes.

Recommendation 40: Call on the federal government to implement an urban, rural and northern Indigenous housing strategy.

The final report cites the fact that there are significant gaps when it comes to home ownership for Indigenous people. For instance, Indigenous people are 11 times more likely to experience homelessness and have incidences of housing need 52% greater than the average person in Canada⁹⁰

The Task Force identifies how the government has made investments in urban Indigenous housing. These investments are starting to be matched by the federal government.

“Indigenous people are 11 times more likely to experience homelessness and have incidences of housing need 52% greater than the average person in Canada.”





Recommendation 41: Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.

An examination of housing and home ownership data for various demographics in Ontario found that among marginalized groups, there are discrepancies in outcomes. According to OREA's *Fighting for Fair Housing* report, just 43% of Black individuals, 50% of Indigenous people, and 47% of LGBTQ2s+ are homeowners, compared to 70% of all Ontarians.

These types of discrepancies can be remedied through new paths to homeownership, which the government can initiate. *Fighting for Fair Housing* makes 9 public policy recommendations to help address inequities in Ontario real estate, from expansion of affordable homeownership programs to supply-increasing measures.

In fact, one of the best things the government can do is continue to increase housing supply broadly, as the same market conditions that are causing our supply crisis impact Ontarians regardless of race, creed, religion, or sexual orientation. New and innovative programs that can help all those first-time home buyers should be considered. Interesting and innovative forms of shared-equity mortgages and co-ownership models should be encouraged, supported, and funded. These new and innovative models of home ownership ought to be connected to efforts around densification for transit-oriented communities. The proposed development of the Vaughan Metropolitan Centre is an example of a project that could benefit from making some of the units affordable through a co-ownership model.⁹¹

Recommendation 42: Provide provincial and federal loan guarantees for purpose-built rental, affordable rental, and affordable ownership projects.

The Canadian Mortgage and Housing Corporation (CMHC)'s Rental Construction Financing Initiative is a key program that provides low-cost funding to borrowers.⁹² Programs such as these provide crucial loans where they are needed most.

The CMHC program offers users favourable borrowing conditions, such as a 10-year term, fixed interest rate, up to 50-year amortization, and low carrying costs thanks to interest-only payments during construction and through occupancy. However, uptake has been slower than anticipated.

Infrastructure Ontario is looking to expand eligibility to create a complimentary loan program for affordable housing projects. This made-in-Ontario program will be different but supplemental to the CMHC's existing program, and to ensure its success, the provincial government should streamline administration. Any new loan guarantee programs should be accessible, accountable, and have minimal administrative burden. A rigorous pre-approval process that determines trusted and known developers with a proven ability to deliver will be necessary. The government must fund this program with sufficient capital if it is going to make a difference. Additionally, the program should have built-in incentives rewarding projects that exceed affordability metrics, beat timelines, and deliver more housing.

The government should also consider creating an Affordability Impact Fund for new and innovative models of affordable and attainable home ownership. This fund should seek to provide seed funding for two or three major projects that have attracted matching private investment for new models, such as shared-equity mortgages, co-ownership models, and/or rent to own developments.





Recommendation 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.

Permits must spur growth and construction of key infrastructure and if municipalities don't use it, they must lose it. By empowering municipalities to withdraw infrastructure projects that have not begun construction within three years, Ontario will prioritize building and ensure there is the infrastructure that communities need.

This recommendation has not seen progress, but may be an element of the review of municipal reserves. Municipalities must prioritize infrastructure and development projects that align with the objectives of more housing supply.

“Permits must spur growth and construction of key infrastructure and if municipalities don't use it, they must lose it.”

Recommendation 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.

In order to create thriving communities, Ontario needs effective infrastructure to go hand-in-hand with the increase in housing. Currently, water and wastewater services are line departments in municipalities. This recommendation would allow for utility expansion to occur with increased financial flexibility.

The Ontario Chamber of Commerce has identified a gap in the infrastructure of today and the needs of tomorrow, citing how “underinvestment, aging stock, climate change, technological and population growth”⁹³ are all factors stifling the creation of infrastructure projects. Furthermore, the Task Force identifies how there are often infrastructure projects that cross the boundaries of municipalities, resulting in delays as questions emerge about who is on the hook to pay for projects.

Water and wastewater projects need completion. And they are often the largest components of development charges.⁹⁴ Delivering on this recommendation will create a long-term solution, creating a municipal services corporation utility through which the municipal corporation would borrow and amortize costs among consumers, instead of using development charges. The province should use

the service delivery review of Peel Region to test this new model of utility structure.

This proposal should be a no-brainer for the government. We know it will work, as it has worked in the past for electricity. The potential long-term benefits to housing affordability from this change are enormous. For example, in the 905 area, the costs of water and wastewater services are the largest single item in development, amounting to tens of thousands of dollars in upfront costs. However, these capital assets can, and should, be paid for over the lifetime of the asset.

As water and wastewater services are municipal departments, any debt that cities require for these assets count towards municipal debt limits. A move to a corporate model, in which cities can hive off debt and ensure that only future user fees finance that debt, can enable the reduction of upfront charges and immediately improve housing affordability.

Ontario can set the standard and create the agenda for a more effective utility infrastructure process that better supports communities.

“Delivering on this recommendation will create a long-term solution, creating a municipal services corporation utility through which the municipal corporation would borrow and amortize costs among consumers, instead of using development charges.”



Recommendation 45: Improve funding for colleges, trade schools, and apprenticeships; encourage and incentivize municipalities, unions, and employers to provide more on-the-job training.

To tackle the housing crisis, Ontario needs the labour force to get to work, however Canada is currently facing a skilled trade labour shortage. The Task Force outlines the need for major investment to both attract and develop the province's skilled trades workforce in order to deliver the 1.5 million new homes critically needed.⁹⁵

Ontario must improve the funding of colleges, trade schools, and apprenticeships, providing real training that will best equip the province's workforce to build the infrastructure needed to fulfill Ontario's potential. The province should consider subsidizing a tuition increase so that colleges are incentivized and supported to offer more training programs for in-demand skilled trades. The current funding and tuition rates for Ontario colleges are creating disincentives to expand domestic student offerings for the skilled trades; instead, popular international student programs are being prioritized.

The provincial government should consider providing construction trades workers income tax rebates – on all the provincial income tax they paid – after five years of working in the trades. Innovative programs such as this must be considered to address the acute labour and skills shortages facing Ontario.

Ontario has been a leader in foreign credential recognition; however, more can be done to reduce barriers to licensing in regulated professions, especially the skilled trades. This includes recognizing training from other countries, such as the United States and the UK, as equivalent; and accelerating the licensing process for individuals from other similar jurisdictions.

In June 2023, the government announced a \$224-million investment to tackle the labour shortage by building and upgrading training centres. This investment is being made through the Skills Development Fund Capital Stream and will, according to the announcement, “help unions, Indigenous centres, and industry associations with funding.”^{96 97}

“To tackle the housing crisis, Ontario needs the labour force to get to work, however Canada is currently facing a skilled trade labour shortage.”

Recommendation 46: Undertake a multi-stakeholder education program to promote skilled trades.

In July 2023, the province announced an investment to build three mobile tech classrooms, the ‘Interactive Trades & Tech Trucks’, which will travel across the province to teach students and young people about the skilled trades.⁹⁸

This effort is an important step in providing a comprehensive, multi-stakeholder education program that helps to promote skilled trades. In a housing crisis, boots on the ground means housing all around.

“In July 2023, the province announced an investment to build three mobile tech classrooms, the ‘Interactive Trades & Tech Trucks.’”



Recommendation 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.

Canada’s immigration policies favours university education over key and in-demand occupations – “skills our economy and society desperately need,” according to the Task Force.⁹⁹ By adopting an approach of encouraging skilled tradespeople to immigrate to Ontario, the government can spur the dynamic labour needed to build infrastructure.

The government should be commended for the reforms to the Ontario Immigrant Nominee Program that have implemented this recommendation, announcing in March 2023 that the number of economic immigrants in 2025 will double from 9,000 to 18,000. This ensures Ontario is equipped with the labour necessary to promote skilled trades, tech, and other key sectors. Most crucially, this will enable Ontario to continue to build housing.

However, as important as these reforms are, they are only the first steps in a series of cultural and social changes that prioritize the skills development and recruitment needed to bolster skilled trades.

The province should press the federal government to further expand the newly announced Category-Based Selection (CBS) Express Entry program for residential construction trades, including by broadening the occupation lists and geographical areas, as noted in OREA's recent immigration and skilled trades report, *Work in Progress: How Immigration Can Address Labour Shortages in Residential Construction*.¹⁰⁰ If CBS is to be successful, it must identify available jobs in the construction trades and help place qualified and credentialed new Canadians into these projects. Further, the government should set a goal of bringing in 10,000 construction trade immigrants each year, with a commitment to assess after two years to determine whether this number should increase.

“As important as these reforms are, they are only the first steps in a series of cultural and social changes that prioritize the skills development and recruitment needed to bolster skilled trades.”



Recommendation 48: The Ontario Government should establish a large “Ontario Housing Delivery Fund.”

The creation of the Ontario Housing Delivery Fund forms a major part of the Task Force’s plan to address the housing crisis. Rewarding municipalities that meet growth targets and approval timelines in turn, helps them invest in needed system upgrades.¹⁰¹

In 2022, the government announced the Streamline Development Approval Fund, designed to “unlock housing supply by cutting red tape and improving processes for residential and industrial developments.” This fund will provide more than \$45 million in assistance to municipalities, with funds expected to flow in the 2023-24 fiscal year.¹⁰²

The Building Faster Fund, announced in August 2023, will allocate \$1.2 billion over three years to municipalities that reach targets – a crucial step to solving the housing crisis. The government correctly recognizes that municipalities should be rewarded and incentivized to build more homes. This new fund is an important acknowledgment that positive incentives must be part of the policy mix. While it will take some time to assess how well this program is designed, and whether it is meeting the objectives that have been laid out, the government must be commended for implementing this large and important recommendation.

Recommendation 49: Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.

In addition to creating conditions for growth and rewarding related achievements, the province should penalize opposition to growth.

Currently, cities that do not agree to housing pledges and meet targets will not get access to incremental funding. This is a strong start. However, they will not lose access to existing funding, which waters down the Task Force's initial recommendation. The government should be encouraged to take further action to reduce funding to municipalities that are not meeting their provincial housing growth and approval timelines.

The province has agreed that we are in a housing supply crisis and, as such, bold, decisive and tough decisions must be taken to incentivize and meet housing targets.

“Currently, cities that do not agree to housing pledges and meet targets will not get access to incremental funding. This is a strong start. However, they will not lose access to existing funding, which waters down the Task Force’s initial recommendation.”

Recommendation 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 bylaws with open data standards. Set an implementation goal of 2025 and make funding conditional on established targets.

A system of common data architecture is a necessary step to better planning, consistency, and fairness. Ontario has struggled from lacking “better data” regarding housing, specifically relating to how targets are being met, projections, and understanding supply.¹⁰³

The government should deliver consistency across data and e-permitting. It has started this work with the Streamline Development Approval Fund, providing \$45-million to large Ontario cities and includes encouraging adoption of e-permitting.¹⁰⁴ As plans include shifting targets, clear aggregate data is required to advance solutions that will create housing for Ontarians.

The federal government has taken the lead on this with requirements for e-permitting as part of the Housing Accelerator fund. We encourage the province to work with and support efforts at the federal level to improve housing data.

Recommendation 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.

Population projections are useful in the context of understanding patterns in housing and demographics – but too many disharmonious projections can lead to confusion. Municipalities may use their own consultant-derived forecasts that end up underestimating potential growth. Requiring adoption of the Ministry of Finance’s projections will create consistency and unity in understanding the need for housing and land use requirements across Ontario.

The province should act on this immediately, particularly in the context of contributing to the understanding of where construction should take place in order to best serve populations. While housing pledges help to solve this, more activation from the province is needed. The Ontario Government is currently consulting on this as part of the Provincial Policy Statement, offering a choice for cities between provincial and municipal forecasts.¹⁰⁵ The final decision on this consultation is expected soon.

Recommendation 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.

This recommendation is tied to the previous one, and will further contribute towards a province-wide solution in data by ensuring municipalities are on board with reporting. This will allow the province to effectively implement the Ontario Housing Delivery Fund. The government has begun consulting on the data they will collect for Ontario’s 29 largest municipal governments.¹⁰⁶



Recommendation 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.

Understanding the interplay between supply and demand is integral to addressing the housing crisis. It is important to have data specific to each municipality as the government takes leadership to create favourable conditions in areas where building homes is the top priority. The people of Ontario, as homeowners and renters, must have access to this data.

In fact, for years experts and governments neglected the supply challenge by arguing housing affordability concerns were demand-driven problems. Governments brought in many mortgage tightening restrictions to attempt to suppress demand, which proved ineffective, if not harmful, to the attainability challenges facing Ontarians. The rate of homeownership in Canada remains on the decline, with would-be buyers becoming increasingly pessimistic about their chances of affording a home in the community they want to live in. Having access to quality municipal data benefits decision makers and ensures that governments are focused on solving the right problems, in the right places.

As with the above recommendation, the province has begun the process of collecting some of this data.¹⁰⁷ However, this recommendation is more specific in that it requires pairing the data collected with forecasted requirements for housing that would emerge from municipal implementation of the new Provincial Policy Statement. It is not clear yet how the province plans to report on this.

Recommendation 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.

To ensure the government implements these recommendations effectively, the Task Force recommended the formation of a new committee. No obvious process changes have been announced to the government's internal structure.



Recommendation 55: Commit to evaluate these recommendations for the next three years with public reporting on progress.

By evaluating the recommendations at the right time, Ontarians can understand the progress that has been made. As the Task Force explains, “the people of Ontario must embrace a housing landscape in which the housing needs of tomorrow’s citizens and those who have been left behind are given equal weight to the housing advantages of those who are already well established in homes that they own.” To do so, the recommendations in the Housing Affordability Task Force report must receive sustained attention, the results must be monitored, and significant financial investment by all levels of government must be made.

While this report attempts to speak to recommendation 55, the Ontario Government is best positioned to report on the progress it has made and, starting on September 15, 2023, progress on implementation has been made publicly available at ontario.ca.¹⁰⁸

They have indeed made progress, as indicated in that report, and as we have shown here. More progress is likely coming soon. We hope that our efforts here can assist the government and the public in monitoring and assessing all the work that the province has done to date – and highlighting the progress that is still needed.



OREA's 10 Action Items to Increase Housing Supply in 2024

The provincial government has made noteworthy progress towards implementing the Housing Affordability Task Force's 55 recommendations. They have fully implemented, or are in the process of implementing, more than 75% of the recommendations. It is no small feat to bring forward significant changes to the way homes are built in Ontario. We also recognize that the government faces the challenge of changing too many policies too quickly, which could inadvertently impact the ability to deliver on the goal of building at least 1.5 million new homes.

Some changes have an immediate effect on the market, but a constant cycle of high-impact changes creates market uncertainty. Once those changes have been announced, the government should return its focus to the most impactful policies, with the most long-term benefit to housing supply in Ontario.

We believe that the following 10 action items are both important and feasible for the government to act on in 2024, as part of the next round of the Housing Supply Action Plan. Our assessment has been made through weighing which policies have the largest impact on building more homes, but also which ones the government can reasonably deliver on within the next year.



Fix the Ontario Land Tribunal and Zoning

1

ACTION ITEM 1

Reform the Ontario Land Tribunal by preventing abuse, eliminating backlog, and allowing fines for unreasonable delays

(HATF Recommendations 27, 31, 29):

a) Ontario must prevent abuses at the Ontario Land Tribunal. While some progress has been made towards **recommendation 27**, it is fundamental that anti-housing advocates are not able to use a legitimate appeals process to circumvent the common good of Ontario and unnecessarily delay much-needed housing supply. We must all recognize we are in a housing supply crisis and prioritize the social and economic need to build more homes.

After an initial false start in Bill 23, the province must be emboldened to fulfill this recommendation, specifically on allowing adjudicators to award costs to the successful party as is common in other areas of litigation. The province needs an aggressive communications strategy that does not apologize for creating a fair and transparent appeals process that cannot be hijacked.

b) The province has also made some progress on implementing **recommendation 31**, eliminating the existing backlog at the Ontario Land Tribunal, and encouraging it to prioritize projects close to the finish line that support housing growth and intensification, as well as prioritizing regional water or utility infrastructure decisions that unlock significant housing capacity.



However, the government must take a role in ensuring that its administrative tribunals are run effectively and efficiently. It is entirely appropriate for the government to direct arm's length tribunals on how to prioritize its time. For example, the Task Force report foresaw that a target of 1.5 million homes in Ontario is something that the Tribunal must now consider in its rulings. The government must, however, remain neutral and not interfere with the substance of the files. Instead, they ought to direct a list of criteria that should be used by the Tribunal to prioritize which backlogged projects must be dealt with first.

c) The government should allow the Ontario Land Tribunal to award punitive damages where it is found that a municipality has refused an application simply to avoid accountability, as per **recommendation 29**. Allowing the Tribunal to punitively damage municipalities who abuse the process would be a positive step to changing the behaviour of municipalities.

ACTION ITEM 2

Implement land use changes to end exclusionary zoning

(HATF Recommendation 3):

The government has made some progress in limiting exclusionary zoning. It is encouraging that the City of Toronto and other municipalities have acted to removing exclusionary zoning from bylaws. However, the province ought to make this a provincial policy by implementing land use changes to end exclusionary zoning – a step it could take in its next housing supply legislation.

2



3

ACTION ITEM 3

Modernize zoning to support commercial-to-residential conversions and greater density along transit corridors

(HATF Recommendations 4, 10, 9):

- a) As Ontario recovers from the pandemic and employers assess their commercial real estate needs, there is an opportunity to convert underutilized commercial properties to residential ones. **Recommendation 4** in the Task Force report makes a compelling case for the importance of allowing this conversion to help address affordability. While some progress has been made, the province should legislate the ability for this conversion to occur and overrule any local bylaws that prohibit this conversion. Particularly problematic is Toronto's outdated policies that restrict office redevelopment nearby transit stations.
- b) The government, consistent with **recommendation 10**, should designate or rezone all land along transit corridors as mixed commercial and residential use. Further, it should consider redesignating all residential apartments and office areas, particularly around transit stations, to mixed commercial and residential zoning in Toronto. This would open greater density around transit corridors and increase the supply of housing in urban areas.
- c) Not all developments need the same features. To this end, **recommendation 9** recognizes that minimum parking requirements on streets utilized by public transit may not be required. This recommendation would 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).



4

ACTION ITEM 4

Streamline new development applications by requiring pre-consultations

(HATF Recommendation 21):

The government should speed up the approval process of new developments through implementing **recommendation 21**, which would require a pre-consultation with all relevant parties. At the consultation, the municipality would set out a binding list that defines what a complete application looks like. This would increase the speed and consistency of applications and mean these pre-consultations are included in the legislated review period.



Lower Housing Costs

5

ACTION ITEM 5

Allow water and wastewater services to be provided through a municipal services corporation

(HATF Recommendation 44):

In the long-term, this is one of the most important recommendations that the government ought to implement by working 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. This is crucial to unlocking more housing supply and implementation should be a priority for the Ontario Government next year.

The government should fund, design, and create an entity who can use the government's balance sheet to fund, borrow, and amortize costs for important and fundamental infrastructure. This will eliminate unnecessary costs on housing developments, while funding these important investments in a transparent and public way. The province, through the Ontario Financing Authority (OFA), has the technical expertise, experience, credibility, and team that could deliver on this commitment in short order. The OFA should be tasked with creating this entity and the government should appoint the board of directors, which should include municipal representatives to govern the entity accordingly.



6

ACTION ITEM 6

Abolish the Land Transfer Tax

(HATF Recommendation 39):

The government should adopt **recommendation 39** and get rid of the economically costly Land Transfer Tax. If it is not willing to eliminate, then it should dramatically reduce the rate. Governments have become addicted to the revenue from this tax, especially as home prices have increased. This tax creates disincentives for first-time homebuyers to move into bigger homes and is negatively impacting the flow of housing supply.

7

ACTION ITEM 7

Reform how municipalities collect and spend development charges

(HATF Recommendation 35):

A study from the C.D. Howe Institute found total development charges collected in 2021 reached more than \$4 billion. However, only a little more than half of the amount collected that year, was subsequently spent. As a next step, we recommend that the province consider whether legislation is required to fix any structural issues with the collection and allocation of development charges.

More Workers and New Models of Ownership

8

ACTION ITEM 8

Increase the number of skilled tradespeople in Ontario

(HATF Recommendation 45):

The government has made progress on improving funding for colleges, trade schools, and apprenticeships; and on encouraging and incentivizing municipalities, unions, and employers to provide more on-the-job training. If we do not have enough people to build, the province will not be able to meet its objective. The single best way to build the needed homes is to increase the supply of qualified and credentialed labour to meet the demand.

The government should consider providing income tax rebates after 5 years of working in the trades. Innovative programs such as this must be considered if we are to address the acute labour and skills shortages facing Ontario, which is projected to wear 40% of the overall labour gap in Canada over the next six years.¹⁰⁹ This will incentivize more people to enter the trades and is a worthwhile cost for supplying affordable and attainable homes.



9

ACTION ITEM 9

Fund pilot programs creating innovative pathways to homeownership

(HATF Recommendation 41):

The government has made progress implementing this recommendation, which would support funding for pilot projects that create innovative pathways to homeownership for Black, Indigenous, and marginalized people, and first-generation homeowners. If this recommendation is to be successful, the government must set a goal to increase the number of first-time homebuyers. This objective will benefit marginalized people, who disproportionately are not homeowners. But it will also help everyone else.

As our economy stratifies between high and low-income earners, many people are unable to save for a new home. The government should create an innovation fund in the Ministry of Municipal Affairs and Housing that would fund and support made-in-Ontario housing innovation that both encourages new pathways to homeownership and helps lower the costs of building homes for all first-time buyers. This fund could be used to support co-ownership models in new developments or shared equity agreements.



10

ACTION ITEM 10

Implement provincial loan guarantees and support for innovative ownership projects

(HATF Recommendation 42):

The government has made progress implementing this recommendation, which would support funding for pilot projects that create innovative pathways to homeownership for Black, Indigenous, and marginalized people, and first-generation homeowners. If this recommendation is to be successful, the government must set a goal to increase the number of first-time homebuyers. This objective will benefit marginalized people, who disproportionately are not homeowners. But it will also help everyone else.

As our economy stratifies between high and low-income earners, many people are unable to save for a new home. The government should create an innovation fund in the Ministry of Municipal Affairs and Housing that would fund and support made-in-Ontario housing innovation that both encourages new pathways to homeownership and helps lower the costs of building homes for all first-time buyers. This fund could be used to support co-ownership models in new developments or shared equity agreements.







Conclusion

Ontario has set a bold goal to preserve the future of homeownership in this province, through recognizing that the crux of the affordability crisis is a historic lack of supply. We cannot hope to solve the housing affordability crisis without addressing the need for increased housing supply, from purpose-built rentals to new homes.

Since setting the 1.5 million unit target in 2021, Ontario has seen 285,377 new starts – meaning we are just 19% of the way there as we enter 2024; and the Government’s own supply projections for the next few years fall short of what is needed.

While good progress has been made on the Housing Affordability Task Force Report’s 55 recommendations since the start of 2022, there is still a long way to go to improve affordability by creating new, attainable, and affordable homes across the province.

More can and must be done to give people in Ontario the homes they need today, and in the future.

By focusing on implementing these tangible action items in 2024, the Province can move the needle on supply and pave the way for increased affordability: now is not the time to take the foot off the gas.

Together, the 10 action items outlined in this report – and the 3 key areas they address – will be critical to increasing housing supply and improving affordability. By providing more resources for projects and infrastructure that support housing development, implementing further policy changes to lower housing costs, and bringing more workers and new models of ownership to Ontario, we can achieve this goal.



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