

Report To:	Regional Chair and Members of Regional Council
From:	Bob Gray, Commissioner, Legislative and Planning Services and Corporate Counsel Cyndy Winslow, Commissioner, Finance and Regional Treasurer
Date:	April 20, 2022
Report No:	LPS38-22/FN-21-22
Re:	Halton Region's response to Provincial Affordable Housing Initiatives and Bill 109

## RECOMMENDATION

1. THAT Report No. LPS38-22/FN-21-22 and Attachment #1 be endorsed as a basis for Regional comments on the Affordable Housing Task Force Report.
2. THAT Report No. LPS38-22/FN-21-22 and Attachment #2 be endorsed as a basis for Regional comments on Bill 109.
3. THAT the Regional Chair submit a letter to the Minister of Municipal Affairs and Housing highlighting the Region's comments on the Report of the Ontario Housing Affordability Task Force and Bill 109, *More Homes for Everyone Act, 2022*.
4. THAT the Regional Clerk forward a copy of Report No. LPS38-22/FN-21-22 to the City of Burlington, the Town of Halton Hills, the Town of Milton, the Town of Oakville, the Association of Municipalities, and the Halton Members of Provincial Parliament (MPPs) for their information.

## REPORT

### **Executive Summary**

There has been a number of Provincial actions including a series of recent reports that address the current housing crisis including the following:

- On Jan 19, 2022, Council received Report No. [LPS16-22/FN-01-22](#). This report was in response to the Provincial-Municipal Housing Summit for Ontario's Big City Mayors and Regional Chairs to identify opportunities to address the housing

affordability crisis. The report discussed Halton's housing supply situation and opportunities for Provincial and Federal collaboration.

- On March 23, 2022, staff presented Report No. [LPS24-22 FN-16-22](#) that provided comments on the [Ontario Housing Affordability Task Force](#) recommendations released February 8, 2022. At the meeting, Regional Council expressed concerns with many of the aspects of the Task Force Report and recommendations and passed a unanimous motion directing staff to consult further with Halton's Local Municipalities and stakeholders and report back.
- On March 30, 2022, the Provincial Government took the first step towards implementing recommendations made by the Ontario Housing Affordability Task Force by introducing its [More Homes for Everyone Plan](#) and [Bill 109, More Homes for Everyone Act, 2022](#).
- If passed, Bill 109 would make a number of significant changes to the *Planning Act*, the *City of Toronto Act, 2006*, the *Development Charges Act, 1997*, the *New Home Construction Licensing Act, 2017*, and the *Ontario New Home Warranties Plan Act*, in an effort to bring housing to market by incentivizing the timely processing of certain applications, addressing market speculation, and the protection of homebuyers.
- A number of public consultations are underway on the more Homes for Everyone Plan including:

Ontario's Regulatory Registry Postings:

- [Proposed Planning Act Changes](#) (comments close April 29, 2022);
- [Proposed Regulatory Changes \(amendments to O. Reg. 509/20 Community Benefits Charges and Parkland\)](#) (comments closed April 6, 2022);
- [Proposed Development Charges Act changes](#) (comments close April 29, 2022);
- [Proposed Regulatory Changes \(amendments to O. Reg. 82/98\) of the Development Charges Act, 1997](#) (comments closed April 6, 2022);
- [Proposed New Home Construction Licensing Act, 2017, changes](#) (comments close April 29, 2022);
- [Proposed Ontario New home Warranties Plan Act changes](#) (comments close April 29, 2022);

- [Proposed Regulatory Changes – Condominium Cancellations](#) (comments close April 22, 2022);
- [Access to Provincial Financing for Not-for-Profit Housing Providers](#) (comments close April 29, 2022);

Environmental Registry of Ontario Postings:

- Consultations on the More Homes for Everyone Plan, (comments close April 29, 2022); [ERO # 019-5283](#);
  - Proposed Planning Act changes – The Proposed *More Homes for Everyone Act, 2022*, (comments close April 29, 2022), [ERO # 019-5284](#);
  - Community Infrastructure and Housing Accelerator – Proposed Guideline, (comments close April 29, 2022); [ERO # 019-5285](#);
  - Opportunities to increase the missing middle housing and gentle density, including supports or multigenerational housing, [ERO # 019-5286](#);
  - Housing Needs in Rural and Northern Municipalities (comments close April 29, 2022), [ERO #019-5287](#).
- The purpose of this report is to provide Regional Council with staff's comprehensive response to the Provincial Government on affordable housing and housing supply based on three main components:
    - Key aspects of Halton's position on housing supply;
    - The Ontario Housing Task Force Report ("Task Force Report") recommendations based on consultation with Halton's Local Municipalities and other stakeholders; and,
    - A response to Bill 109, *More Homes for Everyone Act, 2022*, in order to meet the April 29, 2022, public consultation deadline.

## **Background**

On January 19, 2022, the Minister of Municipal Affairs and Housing hosted a Provincial-Municipal Housing Summit for Ontario's Big City Mayors and Regional Chairs. The purpose of the Summit was to identify opportunities for collaboration between all levels of government to address the housing affordability crisis and to develop performance indicators that governments can use to accelerate and incent new housing supply across the Province. Report No. LPS16-22/FN-01-22 provided Regional Council with feedback on how the Province characterized Halton's progress related to specific tools aimed at advancing housing supply and affordability. The report noted that the Provinces' profile

of Halton's housing supply progress were either not accurately evaluated or warranted greater explanation on how the reporting tool was characterized. The report also identified important actions that are necessary to address housing affordability and housing needs across Halton recognizing that a strong partnership with the Provincial government is vital to the Region's long term goals of advancing housing supply.

On February 8, 2022, the Provincial Government released the Report on the Ontario Housing Affordability Task Force which includes recommendations that, if implemented, would decrease municipal authority and responsibility over housing developments by giving the Province the authority to impose standards related to various planning processes and other matters. The Task Force Report contained 55 recommendations covering five theme areas which the Task Force suggested will quickly increase the supply of market housing over the next 10 years.

On March 23, 2022, staff provided Report No. LPS24-22/FN-16-22 to Regional Council which provided a detailed review of the Task Force Report and staff's response to the recommendations. At the March 23<sup>rd</sup> meeting, Regional Council passed a unanimous motion to defer, directing staff to consult further with Halton's Local Municipalities and stakeholders and to report back.

On March 30, 2022, the Provincial Government took the first step towards implementing the recommendations of the Ontario Housing Affordability Task Force by introducing the More Homes for Everyone Plan and Bill 109, *More Homes for Everyone Act, 2022*. The Provincial Government has indicated that the recommendations of the Task Force will continue to be implemented on a yearly basis over the next four years. This new legislation, if passed, would make a number of significant changes to the *Planning Act*, the *City of Toronto Act, 2006*, the *Development Charges Act, 1997*, the *New Home Construction Licensing Act, 2017*, and the *Ontario New Home Warranties Plan Act* in an effort to, among other goals, incentivize the timely processing of certain applications to bring housing to market quicker, and to increase transparency. The *Planning Act* which is applicable to Halton Region and its Local Municipalities is one of the statutes that appear to be most impacted by Bill 109.

Key changes that are proposed to the *Planning Act* under Bill 109 include:

- Discretion of the Minister of Municipal Affairs and Housing to refer Municipal Comprehensive Reviews (MCRs), Official Plan Amendments (OPAs), or new Official Plans (new OPs), to the Ontario Land Tribunal (OLT) for either a recommendation on whether the Minister should approve, modify or refuse the MCR, OPA/new OP or for a final decision from the OLT on whether the MCR/OPA/new OP should be approved, modified or refused. Where the Minister refers all or parts of an MCR, OPA or new OP to the OLT for a recommendation, there is no right of appeal;
- Allowing the Minister to pause the 120-day decision-making timeline on Official Plans;

- Requiring municipalities to provide a pro-rated fee refund to an applicant if decisions on site plan, official plan amendment and zoning by-law amendment applications are not made within prescribed timelines;
- Requiring municipalities to delegate site plan approval authority from municipal councils to staff, extending site plan review timelines, and applying complete application rules to site plan applications;
- Providing discretionary powers to municipalities to extend draft plan approval for plans of subdivision that have lapsed;
- Providing the Minister with new regulatory authorities as follows:
  - Prohibiting certain matters from being the subject of conditions of draft plan approval;
  - Setting out planning matters that the Minister can require a municipality to report on (including development applications and approvals);
  - Regarding the types of securities that can be used to secure municipal requirements as part of the approvals process.
- Creating a new tool (which is being called the “Community Infrastructure and Housing Accelerator”) for a municipality to request that the Minister provide land use approvals outside of normal processes, similar to a Ministerial Zoning Order (MZO);
- Providing alternative parkland requirements for land in designated transit-oriented communities;
- Prescribing regular reviews of community benefits charge by-laws and rules respecting such reviews; and,
- Enabling the Minister to declare land in transit-oriented communities that have easements or below-grade infrastructure as being “encumbered”, with the effect that the land must be conveyed for parkland, with full credit for parkland dedication.

Other impacts of Bill 109 include changes to the Ontario Building Code; financial investments in the OLT and the Landlord and Tenant Board to improve decision making timelines; developing a process to streamline access to surplus provincial lands for housing providers; improvements to data collection across all levels of government; increases to the Non-Resident Speculation Tax to prioritize Ontario homebuyers over non-residents; and increased protections for new homebuyers who face cancelled or delayed projects.

In addition, the Provincial Government is establishing a Housing Supply Working Group to monitor progress on the municipal implementation of provincial initiatives. The working group will engage with municipalities, the Federal Government, various provincial

ministries, industry partners and associations to monitor progress and determine improvements to annual housing supply action plans.

The Provincial Government is seeking feedback on the changes proposed under the legislation as well as on a number of other initiatives intended to increase housing supply, through a series of housing related public consultations.

A memorandum released by the Deputy Minister on March 31, 2022, stated that the Province is committed to prioritizing implementation of all of the Housing Affordability Task Force's recommendations over the next four years, with a housing supply action plan every year, starting in 2022/2023.

## **Discussion**

The following sections of this report outline staff's comprehensive response on housing supply and affordable housing and are organized as follows:

- Key aspects of Halton's position on housing supply;
- Halton's comments on the Ontario Housing Task Force Report to address Council's deferred motion on Report No. LPS24-22/FN-16-22; and,
- A response to Bill 109, *More Homes for Everyone Act, 2022*.

### Housing Supply Position

Housing supply is a complex issue driven by economic and market forces. Effectively addressing housing supply challenges requires a coordinated and strategic approach across all levels of government. Halton Region continues to be one of the fastest growing regions in Ontario with the Region's Comprehensive Housing Strategy providing the strategic roadmap to address housing supply needs across the housing continuum.

The Region's Official Plan establishes the policy framework to promote market-based housing, affordable housing<sup>1</sup> and housing mix consistent with the Region's vision for growth based on the Provincial Growth Plan. Progress is monitored through annual updates including the Region's annual State of Housing Report.

It is recognized that a strong partnership with the Provincial government is vital to the Region's long term goals of advancing housing supply. Through the Association of Municipalities Ontario (AMO) and other forums, the Chair and Members of Regional Council have long advocated for:

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<sup>1</sup> Affordable housing for the purposes of this report means housing with a market price or rent that is affordable to households of low and moderate income spending no more than 30 percent of the gross household income, as defined in the Regional Official Plan.

- A coordinated, provincial infrastructure investment plan and funding connected to the Growth Plan, to support high-growth communities in advancing critical Provincial infrastructure, including:
  - New schools to support families in high growth areas including North Oakville and Milton;
  - Capital investments in hospitals, including Georgetown;
  - All day, two-way GO service on the Milton line;
  - Investments to unlock growth potential in important growth nodes such as the Mid-Town Oakville Urban Growth Centre;
- Reform to the Ontario Land Tribunal (OLT) that upholds local and Regional planning decisions as well as provides quick delivery of decisions; and,
- Dedicated provincial funding and cost-sharing programs for assisted and affordable housing opportunities.

In addition to the above, regional staff's comments on the [Province's Housing Supply Action Plan](#) emphasized the following priorities that require intervention from the Province:

- New housing supply is dependent on significant municipal infrastructure investments that must be fully recovered through development charges. The Province should take steps to increase municipalities' ability to finance growth through development charges by removing limits placed on collection;
- Timing to deliver new housing supply is impacted by Provincial policies that impose rigid and unnecessary requirements on municipal land use and infrastructure planning and policy. Some examples include:
  - Reforms to the Municipal Class Environmental Assessment process: Construction of critical infrastructure to service growth is often significantly delayed due to the Municipal Class Environmental Assessment planning process when there are frivolous requests to elevate the undertaking to comply with Part II of the *Environmental Assessment Act*. There is an opportunity for the Province to streamline this process especially when infrastructure is identified by an approved Official Plan; and,
  - Continuous Provincial planning reforms divert municipal resources away from implementing existing policies that support housing supply: Over the last several years municipalities across the Greater Golden Horseshoe have not been afforded an opportunity to plan for and implement growth through updates to municipal official plans due to an ever changing policy environment. There needs to be a 'pause' on provincial planning reforms to allow municipalities to develop and implement their growth plans for new housing supply.

## Comments on the Ontario Housing Affordability Task Force Report

In response to Council direction, regional staff engaged with staff from the City of Burlington, Town of Halton Hills, the Town of Milton, and the Town of Oakville, to discuss the Task Force recommendations and other factors that contribute to housing supply challenges that were not addressed in the Task Force Report. Response reports have been prepared by the City of Burlington ([Report PL-27-22](#)), the Town of Milton ([Report DS-017-22](#)), and the Town of Oakville (Oakville's [Report](#)), responding to the Task Force recommendations. The Town of Halton Hills is currently working on a report that will be presented to its Council in May.

Regional staff also reviewed a range of comments and perspectives from around the GTHA on the Task Force Report and recommendations including those from [Ontario's Big City Mayors](#), [Small Urban GTHA Mayors](#), Association of Municipalities Ontario (AMO), Municipal Finance Officer's Association (MFOA), Regional Planning Commissioners of Ontario, and other GTHA municipal perspectives (including municipalities outside of Halton, and other Regional municipalities including Durham, Peel, Niagara, and York). As a result of this consultation and in response to Council's March 23, 2022 motion, Attachment #1 to this report represents Halton's comments on the Affordable Housing Task Force Report.

The consensus amongst Halton's Local Municipalities and other GTHA partners is that the Task Force Report places undue focus on municipal processes and policies without acknowledging that municipalities are significantly engaged in the provision of housing (including assisted housing, affordable housing and market-based housing) through a number of initiatives. The general points of consensus are summarized as follows:

- Failure to include municipal representation on the Task Force is a significant oversight and of critical concern since many of the recommendations place an undue focus on municipal processes suggesting there is a lack of accountability or support for housing options and supply at the municipal level;
- Many of the recommendations are falsely premised on the failure of the planning system at the local municipal level (slow development approvals, outdated zoning, and high fees), failing to recognize that municipalities are fully engaged in the provision of affordable housing options, intensification and increasing the supply of rental housing;
- Narrowly focussing on changes to planning and development charge processes are not going to increase the supply of market-rate housing nor solve the housing affordability crisis in Ontario;
- The Task Force Report fails to identify factors that affect affordability that are far beyond the control of municipalities such as low interest rates, investor demand, immigration, building industry capacity, and supply chain issues;



- Many of the directions in the Task Force Report conflict with other recommendations within the report which propose to advance housing supply (such as reinstating additional appeal rights) that would only prolong the development approval process;
- The Task Force recommendations focus on housing supply and assume that increasing supply will improve housing affordability, however, a majority of the recommendations will have a significant negative impact on municipal finances and processes as well as community development;
- The Provincial Government needs to undertake direct and meaningful consultation with the Region and Local Municipalities prior to the implementation of any of the recommendations of the Task Force Report as they will have significant implications; and,
- The Provincial Government needs to take on a leadership role to create more investment and funding options and tools to get a broad range and mix of housing built and the only way to do this is through continuous engagement and collaboration with municipalities.

Based on consultation with Halton's Local Municipalities and GTHA partners, it is a commonly held position that the Task Force Report recommendations are over-arching and lack important details about how they are intended to be implemented, including their anticipated yearly implementation of the Task Force's recommendations. The comments expressed by Halton Region on the Task Force recommendations in Attachment #1 to this report align with those of the Region's Local Municipalities and with the perspectives of our GTHA partners.

#### Comments on Bill 109, *More Homes for Everyone Act, 2022*

On March 30, 2022, the Provincial Government took the first step in implementing recommendations of the Ontario Housing Affordability Task Force by introducing its More Homes for Everyone Plan and Bill 109, *More Homes for Everyone Act, 2022*. Bill 109 received a second reading on April 5, 2022, and has been referred to Standing Committee in the Ontario Legislative Assembly for consideration on April 11, 2022.

If passed, Bill 109 will introduce a number of *Planning Act* changes of which will have direct implications for the municipal planning approvals process, particularly for local municipalities that have jurisdiction over planning tools that are subject to change such as site plan control, parkland dedication, and community benefits charges. If passed as currently written, Bill 109 will significantly alter municipal planning and appeals process in Ontario by uploading more decision-making authority about local planning from municipalities to the Province and OLT. A summary of the changes proposed in Bill 109, including Halton's comments, are identified in more detail in Attachment #2 to this report.

The proposed changes that have a significant impact on the Region are outlined as follows:

### *Minister's Approval of Official Plans:*

Bill 109 proposes significant changes to the *Planning Act*, particularly to the Minister's decision making powers on Upper-Tier Official Plans and amendments.

Of great concern to regional staff are the proposed changes to the *Planning Act* that would enable the Minister to refer Municipal Comprehensive Reviews, Official Plan Amendments (OPAs), or new Official Plans, to the Ontario Land Tribunal (OLT) for either a recommendation on whether the Minister should approve, modify or refuse the OPA or for a final decision. This new legislation will also allow the OLT to hold a hearing or other proceeding before making their recommendation. This legislation is also unclear as to whether or not a municipality would have any ability to address the Tribunal or if the Tribunal can simply make a decision. These proposed changes will not increase nor speed up the process to advance housing supply, which is contrary to the goal of Bill 109. Rather, it will lead to significant delays in the approval of comprehensive growth management official plans that have taken years to develop and that are based on rigorous background study, policy analysis and extensive public and stakeholder consultation. It also creates uncertainty amongst all parties and takes local decisions out of the hands of elected Councils and their communities, and places them in the hands of an unaccountable tribunal.

Another substantive proposed change is that the Minister will have the authority to refer Upper-Tier Official Plan amendments to the OLT even if they were adopted and sent to the Minister for approval prior to Bill 109 *Planning Act* changes coming into effect. This will result in transitioning these Upper-Tier Official Plans for potential referral to the OLT. Regional staff do not support this change as it would further delay approvals and add to the financial burden of the Region and Local Municipalities due to time and costs associated with OLT hearings.

In addition, Bill 109 proposes to enable the Minister to pause the 120-day timeline that is prescribed for the Minister to make a decision on an Upper-Tier Official Plan or Official Plan amendment (presently a non-decision appeal can be filed 120 days after the official plan or OPA is received by the Minister). It has not been demonstrated how this change will assist with any increase in the supply of housing. This new process may give the Minister additional time to consult with a municipality to clarify or resolve matters that may impact the Minister's decision, however, it could also result in increased timing for a decision and implementation that would cause further delays.

### *Community Infrastructure and Housing Accelerator Tool (CIHA):*

Bill 109 introduces a proposed "Community Infrastructure and Housing Accelerator Tool" (CIHA) that would enable municipalities to request a CIHA order designed to accelerate planning processes for municipalities. The CIHA tool is intended to help municipalities expedite approvals for housing and community infrastructure, such as housing (including community housing, affordable housing and market based housing), public services (health, long-term care, education, recreation, socio-cultural activities, safety and

security), buildings that would facilitate employment and economic development, and mixed-use developments. This tool would largely resemble the current Minister's Zoning Order (MZO), however, a CIHA request would require public consultation undertaken by the requesting municipality, a council vote in favour, and a formal request to the Minister of Municipal Affairs and Housing. The Minister may impose conditions on the issuance of a CIHA order that must be addressed before the zoning can come into effect.

Prior to an Order being made under the CIHA, guidelines would need to be in place. Proposed subsection 34.1 (25) of the *Planning Act* would require the Minister to establish guidelines governing how community infrastructure and housing accelerator orders may be made. The province is currently consulting on the Draft Proposed [Community Infrastructure and Housing Accelerator Guidelines under ERO # 019-5285 as part of Bill 109 \(refer to Attachment #3 to this report\)](#). [The proposed guidelines are very vague and do not offer a detailed framework as to how and when this tool will be used. The proposed guidelines identify that the CHIA can apply to any lands within a municipality's geographic boundaries \(with the exception of lands within the Greenbelt Area\) and allows the Minister to provide an exemption from the Provincial Policy Statement, municipal official plans and other provincial plans \(such as those that ensure the protection of natural heritage, water and agricultural resources\) that may be required.](#)

There are concerns regarding potential misuse of this tool to facilitate ad hoc employment conversions, the provision of servicing outside urban boundaries, and development in areas that may undermine comprehensive growth management processes that have identified where and how growth should occur in municipalities. If this tool is implemented, it should only apply to lands designated for urban uses as identified in Official Plans, and be aligned with the provision and timing of municipal infrastructure and should not have disregard for provincial policies and plans.

#### *Refunding Application Fees:*

Additional changes to the legislation will require municipalities to provide a pro-rated fee refund for site plan, zoning by-law and official plan amendment application fees if a decision is not made within the legislated timelines of receiving the complete application. The implementation of this measure will have financial impacts for Halton Region as well Local Municipalities. To avoid any loss in revenue, municipalities may need to hire additional staff to review technical studies to ensure they meet the required standards before an application is deemed complete as technical issues are often not dealt with correctly by the applicant on the first submission of these reports. If implemented, this measure may have the unintended consequence of making applications more difficult to deem complete or more applications ending up at the OLT due to refusal appeals. Additionally, if this change is implemented it will force municipalities to adopt procedures and approaches that do not serve to solve problems and advance proposals. As such, this would likely have the opposite effect of speeding up the development process. It will be time consuming and expensive for Regional and Local Municipal staff and any loss in revenue may need to be absorbed by municipal levies. It will also require more upfront

work on the part of applicants in coordination with external agencies for permits and approvals.

#### *Subdivision Conditions:*

If passed, Bill 109 will allow the Minister to prescribe matters that are not permitted to be imposed as conditions to subdivision approval. It is not clear why there is a need for greater provincial intervention into local municipal affairs for subdivision approvals and how this new regulation will increase housing supply or address housing affordability. Municipalities have varying requirements that need to be addressed prior to development occurring. Standardizing conditions to a 'one-size fits all' approach will have the effect of creating greater confusion and difficulty. It will not allow for new and innovative approaches for municipalities to pre-solve legitimate issues related to development. The feasibility of implementing standard province-wide legal agreements and plans of subdivision would take significant effort and would be extremely difficult. Every area of Ontario has unique geography, building conditions, water and wastewater supply, funding arrangements, etc. Municipalities have varying degrees of complexity and this proposed legislation encroaches on municipal autonomy and decision making for matters within their jurisdiction. Regional staff do not support a "one size fits all" approach to set standards for subdivision conditions. Municipalities should retain authority to set conditions that are reasonable and in keeping with the development proposed in the subdivision.

#### *Other matters:*

Additional changes to municipal processes are proposed through Bill 109 changes and are covered in greater detail in attachment #2.

### **Conclusion**

Housing supply and affordability are complex issues and require a coordinated and strategic approach across all levels of government. Halton Region has had a long standing partnership and commitment with its Local Municipalities with practical actions for growth and development that conform to Provincial targets in efforts to increase housing supply across the continuum. Halton Region cannot advance housing supply on its own and requires a meaningful partnership with Provincial and Federal Governments as well as housing advocates, the non-profit, and co-operative housing sectors to develop strategic and coordinated responses to the housing supply crisis.

The Housing Affordability Task Force Report has provided some positive ideas for further investigation, in particular, increasing the supply of rental housing, missing middle housing, increasing secondary suites and increasing density in targeted areas. However, the Task Force Report fails to recognize that municipalities are fully engaged in supporting creation of more housing options, intensification, transit-oriented development and increasing the supply of rental housing. The report provides little evidence to

suggest, but contains strong accusations, that perceived municipal red tape is responsible for the slow progress of new housing options, which is not the case.

Building new affordable housing is not part of the Task Force Report nor is it explicit in the intent of Bill 109. Market-rate housing is an important part of the puzzle and solution to meet residential demand and keep up with growth, however, an affordable housing strategy that solely focusses on adding market-rate housing will not solve the housing crisis in Ontario. A range of policies are needed to curb speculation, increase the supply of non-market, genuinely affordable housing options and ensure tenants have adequate protections through rent control polices.

The current Provincial response to the housing crisis is narrow, focusing on recommendations to alter municipal processes intended to rapidly increase the supply of market-based housing while failing to recognize or address issues that are central to making housing more affordable in Ontario. The changes proposed in both the Task Force Report and through Bill 109 will not speed up the process to advance housing supply but will instead lead to significant delays in the approval of comprehensive growth management plans and places local level decisions in the hands of the unaccountable OLT. The Provincial Government is encouraged to examine, in a meaningful way, and in collaboration with municipalities and stakeholders, topics such as, rental housing incentives, investor speculation, innovative funding options and permanent on-going financial tools to create additional community housing.

Although not part of the impact for the most recent suggested changes, the Province's proposal indicates that "the Province is committed to implementing the Task Force's recommendations with a housing supply action plan every year over four years" which implies that all recommendations from the task force will be implemented. Halton would like to note the challenge in continuous change and implementation over four years which would result in planning delays and would be in direct conflict of this Bills intent. Further, Halton does not agree with many of the recommendations in the Housing Task Force paper and there has not been a fulsome discussion of impacts that each recommendation could have and how it addresses the housing crisis.

A more robust analysis of issues and broader engagement will ensure that practical evidence-based solutions can be developed and implemented to achieve affordability for all Ontarians.

## FINANCIAL/PROGRAM IMPLICATIONS

There are no immediate financial implications associated with the recommendations contained in this report. However, if changes are implemented through Bill 109 such as changes to review timelines, refunding applications, and new OLT procedures, there may be significant impacts that will have to be reviewed in further detail.

Respectfully submitted,



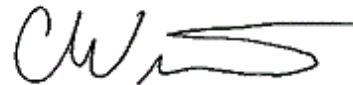
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If you have any questions on the content of this report,  
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Attachments: Attachment #1 – Halton Region comments on the Ontario Affordability Task Force Report  
Revised  
Attachment # 2 – Bill 109 Table  
Attachment #3 – Community Infrastructure and Housing Accelerator – Proposed Guideline  
Attachment #4 – Comments on proposed changes to the Development Charges Act, 1997